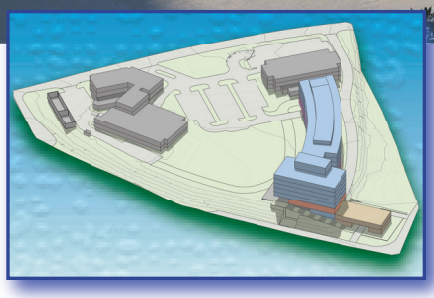
*Final*

*September 2021*

# Environmental Impact Report for the Beach Cities Health District Healthy Living Campus Master Plan

## SCH No. 2019060258



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# Beach Cities Health District
# Healthy Living Campus Master Plan

*Final*
*Environmental Impact Report*
*State Clearinghouse No. 2019060258*

Prepared for:

Beach Cities Health District
514 North Prospect Avenue
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# ACRONYMS AND ABBREVIATIONS

| | |
|---|---|
| °F | degrees Fahrenheit |
| µg/kg | micrograms per kilogram |
| µT | microteslas |
| AB | Assembly Bill |
| ACM | asbestos-containing material |
| ACS | American Community Survey |
| ADA | Americans with Disabilities Act |
| ADT | average daily trip |
| AES | AES Corporation |
| AF | acre-feet |
| AFY | acre-feet per year |
| AHERA | Asbestos Hazard Emergency Response Act of 1986 |
| AIN | Assessor's Identification Number |
| APS | Alternative Planning Strategy |
| AQMP | Air Quality Management Plan |
| ARB | Architectural Review Board |
| ASTM | American Standard for Testing and Materials |
| ATSDR | Agency for Toxic Substances and Disease Registry |
| AVO | average vehicle occupancy |
| BCHD | Beach Cities Health District |
| bgs | below ground surface |
| BMP | best management practice |
| C&D | construction and demolition |
| CAA | Clean Air Act of 1963 |
| CAAQS | California Ambient Air Quality Standards |
| Cal EMA | California Emergency Management Agency |
| Cal Water | California Water Service Company |
| CalEEMod | California Emissions Estimator Model |
| CalEPA | California Environmental Protection Agency |
| CalGEM | California Geologic Energy Management Division |
| CALGreen | California Green Building Standards |
| CalOES | California Office of Emergency Services |
| CalOSHA | California Occupational Safety and Hazard Administration |
| Caltrans | California Department of Transportation |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CAT | Climate Action Team |
| CBC | California Building Code |
| CBSC | California Building Standards Code |
| CC | Catalina Corridor |
| CCAA | California Clean Air Act |
| CCR | California Code of Regulations |
| CDC | Centers for Disease Control and Prevention |
| CDFW | California Department of Fish and Wildlife |

| | |
|---|---|
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act of 1980 |
| CESA | California Endangered Species Act |
| CFC | chlorofluorocarbon |
| CFR | Code of Federal Regulations |
| cfs | cubic foot per second |
| CGS | California Geological Survey |
| $CH_4$ | methane |
| CHF | Center for Health and Fitness |
| CHL | California Historical Landmarks |
| CHP | California Highway Patrol |
| CIWMA | California Integrated Waste Management Act |
| CIWMB | California Integrated Waste Management Board |
| CNDDB | California Natural Diversity Database |
| CNEL | Community Noise Equivalent Level |
| CNPS | California Native Plant Society |
| CO | carbon monoxide |
| $CO_2$ | carbon dioxide |
| $CO_2e$ | carbon dioxide equivalent |
| CPUC | California Public Utilities Commission |
| CRHR | California Register of Historic Resources |
| CRPR | California Rare Plant Rank |
| CTR | California Toxics Rule |
| CUP | Conditional Use Permit |
| CUPA | Certified Unified Program Agency |
| CWA | Clean Water Act |
| CWG | Community Working Group |
| cy | cubic yard |
| d/D | depth to diameter |
| dB | decibel |
| DDE | 4,4'-dichlorodiphenyldichloroethylene |
| DDT | Dichlorodiphenyltrichloroethane |
| DHS | Department of Health Services |
| DOGGR | California Department of Conservation, Division of Oil, Gas, and Geothermal Resources |
| DOT | U.S. Department of Transportation |
| DPM | diesel particulate matter |
| DPW | Department of Public Works |
| DTSC | Department of Toxic Substances Control |
| DWQ | Division of Water Quality |
| DWR | California Department of Water Resources |
| ECL | Edward C. Little |
| EECAP | Energy Efficiency Climate Action Plans |

| | |
|---|---|
| EIR | Environmental Impact Report |
| ELF | extremely low frequency |
| EMF | electric and magnetic fields |
| EMFAC | EMission FACtors |
| EMS | Emergency Medical Services |
| EPCRA | Emergency Planning and Community Right to Know Act of 1986 |
| EPD | Environmental Programs Division |
| ESA | Environmental Site Assessment |
| EV | Electric Vehicle |
| EWMP | Enhanced Watershed Management Program |
| FAR | Floor Area Ratio |
| Federal ESA | Federal Endangered Species Act |
| FEMA | Federal Emergency Management Agency |
| FHSZ | Fire Hazard Severity Zone |
| FY | Fiscal Year |
| FTA | Federal Transit Administration |
| g/L | grams per liter |
| gal/hp/hr | gallons per horsepower per hour |
| GBMP | Groundwater Basins Master Plan |
| GHG | greenhouse gas |
| GIS | geographic information system |
| GPAC | General Plan Advisory Committee |
| gpd | gallons per day |
| gpm | gallons per minute |
| GSA | groundwater sustainability agency |
| GSP | groundwater sustainability plan |
| GWh | gigawatt hours |
| GWP | global warming potential |
| H&SC | Health and Safety Code |
| $H_2CO_3$ | carbonic acid |
| $H_2S$ | hydrogen sulfide |
| HARP | Hotspots Analysis Reporting Program |
| HBCSD | Hermosa Beach City School District |
| HERO | Home Energy Renovation Opportunity |
| HI | hazard index |
| HIc | chronic hazard index |
| HIN | High Injury Network |
| HOV | High Occupancy Vehicles |
| HRA | Health Risk Assessment |
| HVAC | heating, ventilation, and air conditioning |
| Hyperion | Hyperion Wastewater Treatment Plant |
| I- | Interstate |
| IPCC | Intergovernmental Panel on Climate Change |
| IS | Initial Study |

| | |
|---|---|
| ISO | Insurance Service Office |
| ITE | Institute of Transportation Engineer |
| JWPCP | Joint Water Pollution Control Plan |
| kHz | kilohertz |
| kV | kilovolt |
| KVL | Key Viewing Location |
| kWh | kilowatt hours |
| LACDPW | Los Angeles County Public Works Department |
| LACFCD | Los Angeles County Flood Control District |
| LACoFD | Los Angeles County Fire Department |
| LACSD | Los Angeles County Sanitation District |
| LAUSD | Los Angeles Unified School District |
| LAX | Los Angeles International Airport |
| LBP | lead-based paint |
| LEED | Leadership in Energy and Environmental Design |
| $L_{eq}$ | Equivalent Continuous Noise Level |
| $L_{dn}$ | Day-Night Average Noise Level |
| $L_{min}$ | Minimum Instantaneous Noise Level |
| $L_{max}$ | Maximum Instantaneous Noise Level |
| LID | low impact development |
| LOS | Level of Service |
| LRA | Local Responsibility Area |
| LRTP | Long Range Transportation Plan |
| LST | Localized Significance Threshold |
| LUST | Leaking Underground Storage Tank |
| MBTA | Migratory Bird Treaty Act |
| MBUSD | Manhattan Beach Union School District |
| MEIR | maximum exposed individual resident |
| Metro | Los Angeles Metropolitan Transit Authority |
| $mg/cm^2$ | milligram per square centimeter |
| mg/kg | milligram per kilogram |
| mg/L | milligrams per liter |
| mgd | million gallons per day |
| MICR | maximum individual cancer risk |
| MM | Mitigation Measure |
| MMRP | Mitigation Monitoring and Reporting Program |
| MODRAT | Modified Rational Method |
| mph | miles per hour |
| MPO | Metropolitan Planning Organization |
| MRF | Materials Recovery Facility |
| MS4 | Municipal Separate Storm Sewer System |
| MSL | mean sea level |
| MT $CO_2e$ | metric tons of carbon dioxide equivalent |
| MUTCD | Manual on Uniform Traffic Control Devices |
| MWD | Metropolitan Water District |

| | |
|---|---|
| $N_2O$ | nitrous oxide |
| NAAQS | National Ambient Air Quality Standards |
| NAHC | Native American Heritage Commission |
| NAL | Numeric Action Level |
| NASA | National Aeronautics and Space Administration |
| NCDC | National Climatic Data Center |
| NEL | Numeric Effluent Limitation |
| NERHP | National Earthquake Hazards Reduction Program |
| NESHAP | National Emission Standard for Hazardous Air Pollutants |
| NFPA | National Fire Protection Association |
| NHPA | National Historic Preservation Act |
| NMFS | National Marine Fisheries Service |
| $NO_2$ | nitrogen dioxide |
| NOAA | National Oceanic and Atmospheric Administration |
| NOI | Notice of Intent |
| NOP | Notice of Preparation |
| $NO_x$ | nitrogen oxides |
| NPDES | National Pollutant Discharge Elimination System |
| NPPA | Native Plant Protection Act |
| NRHP | National Register of Historic Places |
| NWI | National Wetlands Inventory |
| $O_3$ | ozone |
| OEHHA | Office of Environmental Health Hazard Assessment |
| OHP | California Office of Historic Preservation |
| OPR | California Governor's Office of Planning and Research |
| OSHA | Occupational Health and Safety Administration |
| OTC | Once-Through Cooling |
| OVA | Organic Vapor Analyzer |
| PACE | Program of All-Inclusive Care for the Elderly |
| Pb | lead |
| PBDE | polybrominated diphenyl ethers |
| PCB | polychlorinated biphenyl |
| PCE | tetrachloroethylene |
| P-CF (zoning) | Public Community Facility zoning |
| PCH | Pacific Coast Highway |
| PDWF | Peak Dry Weather Flow |
| PID | photoionization detector |
| $PM_{10}$ | respirable particulate matter |
| $PM_{2.5}$ | fine particulate matter |
| PMI | point of maximum impact |
| ppb | parts per billion |
| ppm | parts per million |
| ppmv | parts per million by volume |
| PRC | Public Resources Code |
| Project | Healthy Living Campus Master Plan |

| | |
|---|---|
| psi | pounds per square inch |
| PWWF | Peak Wet Weather Flow |
| R1 (zoning) | Single Family Residential zoning |
| RAST | Risk Assessment Standalone Tool |
| RBFD | Redondo Beach Fire Department |
| RBMC | Redondo Beach Municipal Code |
| RBPD | Redondo Beach Police Department |
| RBUSD | Redondo Beach Unified School District |
| RCFE | Residential Care for the Elderly |
| RCRA | Resource Conservation and Recovery Act |
| REC | Recognized Environment Condition |
| REL | reference exposure level |
| RGWMP | Regional Groundwater Monitoring Program |
| RHNA | Regional Housing Needs Assessment |
| R-LO (zoning) | Low Density Residential zoning |
| ROG | reactive organic gas |
| RRP | Rehabilitation and Replacement Program |
| RTP | Regional Transportation Plan |
| RTP/SCS | Regional Transportation Plan / Sustainable Communities Strategy |
| RWQCB | Regional Water Quality Control Board |
| SB | Senate Bill |
| SBCCOG | South Bay Cities Council of Governments |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCCIC | South Central Coastal Information Center |
| SCE | Southern California Edison |
| SCH | State Clearinghouse |
| SCS | Sustainable Communities Strategy |
| SEA | Significant Ecological Area |
| SECAP | System Evaluation and Capacity Assurance Plan |
| sf | square foot/feet |
| SGMA | Sustainable Groundwater Management Act |
| SIP | State Implementation Plan |
| SLIC | Spills, Leaks, Investigations, and Cleanups |
| SMBRC | Santa Monica Bay Restoration Commission |
| $SO_2$ | sulfur dioxide |
| SoCal Gas | Southern California Gas Company |
| SR- | State Route |
| SRRE | Source Reduction and Recycling Elements |
| SSO | sanitary sewer overflows |
| SUSMP | Standard Urban Stormwater Mitigation Plan |
| SVE | Soil Vapor Extraction |
| SVP | Society for Vertebrate Paleontology |
| SWITRS | California Highway Patrol Statewide Integrated Traffic |

| | |
|---|---|
| | Records Systems |
| SWP | State Water Project |
| SWPPP | Stormwater Pollution Prevention Plan |
| SWRCB | State Water Resources Control Board |
| TAC | toxic air contaminant |
| TAZ | transportation analysis zone |
| TCE | dichlorodifluoromethane |
| TDM | Transportation Demand Management |
| TDS | total dissolved solids |
| TFD | Torrance Fire Department |
| TIMS | Transportation Injury Mapping System |
| TMC | Torrance Municipal Code |
| TMDL | Total Maximum Daily Loads |
| TNC | Transit Network Company |
| TOD | transit-oriented development |
| TPA | transit priority area |
| TPD | Torrance Police Department |
| TPH | Total Petroleum Hydrocarbons |
| TSCA | Toxic Substances Control Act of 1976 |
| UBC | Uniform Building Code |
| UCMP | University of California Museum of Paleontology |
| USC | U.S. Code |
| USEPA | U.S. Environmental Protection Agency |
| USFWS | U.S. Fish and Wildlife Service |
| USGBC | U.S. Green Building Council |
| USGS | U.S. Geological Survey |
| UWMP | Urban Water Management Plan |
| UWMPA | Urban Water Management Planning Act |
| V/C | volume to capacity |
| VMT | vehicle miles traveled |
| VOC | Volatile organic compounds |
| W (zoning) | Waterfront zoning |
| WBMWD | West Basin Municipal Water District |
| WHO | World Health Organization |
| WMA | Watershed Management Area |
| WMG | Watershed Management Group |
| WMP | Watershed Management Plan |
| Wood | Wood Environment & Infrastructure Solutions, Inc. |
| WRD | Water Replenishment District of Southern California |

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# EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) evaluates the potential environmental impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) in the Cities of Redondo Beach and Torrance, California. The EIR was prepared by Wood Environment & Infrastructure Solutions, Inc. (Wood) and its team of subconsultants including iLanco Environmental, LLC (iLanco; Air Quality and Greenhouse Gas [GHG] Emissions), Fehr & Peers (Transportation), and VIZf/x (Aesthetics and Architectural Services).

As described in further detail in Section 2.0, *Project Description*, the proposed Healthy Living Campus Master Plan would redevelop the existing BCHD campus to: 1) address escalating building maintenance costs and seismic-related structural issues; and 2) to provide purpose-built facilities necessary to support BCHD's public health and wellness programs and services. BCHD has developed a detailed preliminary site development plan for Phase 1, which is evaluated in this EIR at a project level of detail. BCHD has also developed a more general development program for Phase 2 based on the design guidelines of the proposed Healthy Living Campus Master Plan and the best available planning information at this time. The Phase 2 development program has been evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights. Operational impacts have also been evaluated programmatically in that the analysis addresses maximum building space allocations.

New development under Phase 1 would include a 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) Building with 157 new Assisted Living units, 60 Memory Care units (replacing the existing Silverado Beach Cities Memory Care Community located within Beach Cities Health Center), 14,000 sf of space for the Program of All-Inclusive Care for the Elderly (PACE), 6,270 sf of space for Community Services, and a 9,100-sf Youth Wellness Center. The RCFE Building would include a new driveway and pick-up/drop-off zone located on the vacant Flagler Lot as well as a new subterranean service area and loading dock entry/exit along Flagler Lane. Following the construction of the RCFE Building, the existing 158,000-sf Beach Cities Health Center would be demolished providing space for approximately 114,830 sf of open space as well as an approximately 40,725-sf surface parking lot with 86 (including accessible parking spaces and electric vehicle [EV] charging stations).

The long range development program under Phase 2, while less defined than the project-level preliminary site development plan under Phase 1, would provide a Wellness Pavilion of up to 37,150 sf, an Aquatics Center of up to 31,300 sf (including 24,000 sf of indoor space and 7,300 sf of outdoor space), and up to 20,000 sf of space for the Center for Health and Fitness (CHF), which

would be relocated back to the campus. Parking would be provided in a parking structure with up to 2 subterranean levels and up to 8.5 above ground levels. The EIR depicts three example site plans for the Phase 2 development program to illustrate the possible range. However, the EIR analyzes potential construction-related impacts (e.g., ground disturbance) and aesthetics impacts (e.g., building height) using conservative assumptions related to maximum building footprints and maximum building heights. The ultimate site development plan developed for Phase 2 would fit within this maximum building envelope.

## PROJECT OBJECTIVES

CEQA Guidelines Section 15124(b) (Title 14 of the California Code of Regulations [CCR] Section 15000 *et seq.*) requires the description of the project in the EIR to include *"[a] statement of objectives sought by the proposed project."* As further stated in CEQA Guidelines Section 15124(b), a clear statement of objectives will help the lead agency develop a reasonable range of alternatives for consideration in the EIR and aid decision-makers in preparing findings or a statement of overriding considerations, if necessary.

BCHD developed three major *"Project Pillars,"* which were presented to the Board of Directors during a public meeting on June 17, 2020. The Project Objectives are based on these three Project Pillars:

<u>Health</u>

- Build a center of excellence focusing on wellness, prevention, and research.
- Leverage the campus to expand community health programs and services.

<u>Livability</u>

- Focus on emerging technologies, innovation, and accessibility.
- Create an intergenerational hub of well-being, using Blue Zones Project principles.

<u>Community</u>

- Actively engage the community and pursue partnerships.
- Grow a continuum of programs, services, and facilities to help older adults age in their community.

Based on these Project Pillars, BCHD developed six Project Objectives:

- Eliminate seismic safety and other hazards of the former South Bay Hospital Building (514 North Prospect Avenue).

- Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services.
- Provide sufficient public open space to accommodate programs that meet community health needs.
- Address the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces.
- Redevelop the Project site to create a modern campus with public open space and facilities designed to meet the future health needs of residents, with meeting spaces for public gatherings and interactive education.
- Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs.

The underlying purpose of the proposed BCHD Healthy Living Campus Master Plan is to solve the current seismic issues associated with the former South Bay Hospital Building and establish a center of excellence for community health. Implementation of the proposed Project is intended to meet the six objectives described above and therefore achieve the underlying purpose of the proposed Project.

### ENVIRONMENTAL IMPACT ANALYSIS

This EIR examines potential short- and long-term impacts of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the project is implemented. For each environmental topic area, the thresholds for determining the significance of potential impacts are identified based on Appendix G of the CEQA Guidelines, along with descriptions of methodologies used for conducting the impact analysis. For some environmental topic areas, such as air quality, greenhouse gas (GHG) emissions, noise, and transportation, the analyses of impacts are quantitative in nature and involve the comparison of potential impacts against numerical thresholds. For other environmental topic areas, such as land use and planning, the analyses of impacts are inherently more qualitative, involving the consideration of a variety of factors, such as adopted policies and regulations.

The EIR impact discussions classify impact significance levels as:

- **Significant and Unavoidable** – a significant impact to the environment that remains significant even after mitigation measures are applied;
- **Less Than Significant with Mitigation** – a significant impact to the environment that can be avoided or reduced to a less than significant level with mitigation;
- **Less Than Significant** – a potential impact that would not meet or exceed the identified thresholds of significance for the environmental topic area; and
- **No Impact/Beneficial Impact** – no impact would occur for the environmental topic area or a beneficial effect would result.

Determinations of significance levels in the EIR are made based on impact significance criteria and applicable CEQA Guidelines for each topic area.

Pursuant to CEQA Guidelines, Section 15126.4, where potentially significant environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts are also identified. Pursuant to CEQA, feasible mitigation measures must be implemented for all significant impacts.

### NOTICE OF PREPARATION/SCOPING

As a first step in complying with the procedural requirements of CEQA, BCHD conducted a public scoping process consistent with CEQA Guidelines Section 15083. The public was provided with an opportunity to comment on the scope of the EIR through a Notice of Preparation (NOP) released on June 27, 2019. The NOP was distributed to Federal, State, and local agencies, neighborhood groups, and all occupants and owners within a 1,000-foot radius of the Project site. The NOP comment period began on June 27, 2019 and ended on July 29, 2019. Three Public Scoping Meetings for the EIR were held during the NOP comment period on July 15, 2019 in Redondo Beach, July 17, 2019 in Manhattan Beach, and July 22, 2019 in Hermosa Beach. During the meetings, BCHD staff described the proposed Project and the environmental review process and received public comment on the scope and content of the EIR. The scoping process assisted the BCHD in determining if any aspect of the proposed Project may cause a significant effect on the environment and, based on that determination, narrow the focus of the subsequent environmental analysis. Comments received during the NOP comment period were considered during EIR preparation and are included in Appendix A. BCHD also held scoping meetings for involved public agencies to solicit input and feedback from relevant public agencies.

### SUMMARY OF PROJECT IMPACTS

The significance of each impact resulting from implementation of the proposed Project has been determined based on impact significance criteria and applicable CEQA Guidelines for each impact

topic. Table ES-1 presents a summary of the impacts, mitigation measures, and residual impacts that could result from implementation of the proposed Project. The proposed Project would result in significant and unavoidable construction-related noise impacts (refer to Section 3.11, *Noise*). Additionally, the proposed Project would result in less than significant (or less than significant with mitigation) impacts that are related to areas of community concern that were identified during community meetings held between 2017 and 2020 as well as agency and public comment letters received on the Notice of Preparation. These areas of community concern include aesthetics bulk/size, construction-related air emissions, soil erosion, hazardous materials, land use, and transportation (refer to Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*; Section 3.6, *Geology and Soils*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; and 3.14, *Transportation*, respectively). While this EIR determined that impacts related to these resource areas are not anticipated to be significant, these controversial impacts as well as the significant and unavoidable impacts identified for the proposed Project were used as screening criteria to determine feasible alternatives that could avoid or reduce these effects (see Section 5.4, *Alternatives Considered but Rejected from Further Analysis* and Section 5.5, *Alternatives Analysis*). Refer to Section 1.8, *Areas of Known Public Controversy* for the full list of environmental issues known to be of public concern.

### SUMMARY OF CUMULATIVE IMPACTS

CEQA Guidelines Section 15130(a) states that an EIR shall "*discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerabl*e." In this context, "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and/or the effects of probable future projects (as defined by CEQA Guidelines Section 15130). The proposed Project would not substantially contribute to any cumulatively considerable impacts for any of the environmental issues areas evaluated within the EIR.

### ALTERNATIVES ANALYSIS

CEQA Guidelines state that an "*EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives*" (CEQA Guidelines Section 15126.6). As such, the EIR evaluates six alternatives, including a No Project Alternative, in compliance with CEQA. These alternatives include:

- Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)

- Alternative 2 – Sale and Redevelopment of the BCHD Campus
- Alternative 3 – Revised Access and Circulation
- Alternative 4 – Phase 1 Preliminary Site Development Plan Only
- Alternative 5 – Relocate CHF Permanently and Reduced Parking Structure
- Alternative 6 – Reduced Height Alternative

### ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment.

Table 5.5-5 compares the environmental impacts of the proposed Project and the analyzed alternatives. Of the alternatives considered, the No Project Alternative generates the fewest environmental impacts; therefore, it is generally environmentally superior to any project that proposes to change existing conditions through the addition of increased development with associated impacts. However, CEQA Guidelines Section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

According to CEQA Guidelines Section 15126.6(a), the purpose of an alternatives analyses is to identify alternative developments that would feasibly attain most of the basic objectives of the project but that would avoid or substantially reduce any of the significant effects of the proposed Project. Other than the No Project Alternative, none of the remaining alternatives would avoid the significant and unavoidable construction-related noise impacts at nearby sensitive receptors. Daily construction-related impacts would be similar to those described for the proposed Project (i.e., construction noise levels would be similar; however, the total duration of construction noise would be reduced due to the elimination of the Phase 2 development program).

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| **SECTION 3.1, *AESTHETICS AND VISUAL RESOURCES*** | | |
| **Impact VIS-1** The proposed Residential Care for the Elderly (RCFE) Building included in the Phase 1 preliminary development plan would interrupt public views of the Palos Verdes hills from ~~the highpoint at~~ the intersection of 190th Street ~~and~~ & Flagler Lane. However, a reduction in the height of the building would reduce this impact to *less than significant with mitigation*. | **MM VIS-1** Reduced Residential Care for the Elderly (RCFE) Building Height. The final design of the Phase 1 preliminary site development plan shall be revised to reduce the maximum height of the RCFE Building in order to avoid interruption of the ridgeline of the Palos Verdes hills as viewed from the intersection of 190th Street & Flagler Lane. This revision to the final design could include a reduction in the floor-to-ceiling height, ~~the~~ removal of the uppermost stories of the building, and/or recessing the building foundation further into the ground surface. The reduced building height shall be formalized on all final building plans and construction plans, as appropriate, prior to the issuance of any demolition, grading, or building permits by the Redondo Beach Building & Safety Division. City of Redondo Beach permit compliance staff shall observe and ensure compliance with these specifications during construction activities associated with the proposed Project. | Implementation of MM VIS-1 would reduce the height of the RCFE Building such that it would rise to a point just below the ridgeline of the Palos Verdes hills as viewed from 190th Street & Flagler Lane. The panoramic views of the ridgeline would remain uninterrupted. Therefore, residual impacts would be *less than significant.* |
| **Impact VIS-2** The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would alter the visual character of the Project site and surrounding areas in Redondo Beach and Torrance. However, the proposed development would comply with the Redondo Beach and Torrance General Plans and municipal codes and would not degrade the surrounding visual character. Therefore, impacts would be *less than significant*. | No mitigation required | Less than significant |
| **Impact VIS-3** The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would create new sources of exterior lighting. Additionally, building materials used in the construction of the proposed buildings could result in new sources of glare. However, through the conformance of the proposed | No mitigation required | Less than significant |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| Project with the Redondo Beach Municipal Code (RBMC) and the Torrance Municipal Code (TMC), impacts associated with the proposed Project would be *less than significant*. | | |
| **Impact VIS-4** The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would result in additional shading of adjacent properties. However, the extent and duration of shading would be *less than significant*. | No mitigation required | Less than significant |
| **SECTION 3.2, *AIR QUALITY*** | | |
| **Impact AQ-1** Construction and operation of the proposed Beach Cities Health District (BCHD) Healthy Living Campus – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate emissions that would contribute to Basin-wide air pollutant emissions. Because the proposed Project would not cause or increase the severity of air quality violations and mitigated emissions would not exceed the South Coast Air Quality Management District's (SCAQMD's) significance thresholds, the proposed Project would not conflict with the Air Quality Management Plan (AQMP). Therefore, impacts would be *less than significant with mitigation.* | Refer to MM AQ-1 below | With implementation of MM AQ-1, which would include requirements for soil stabilization and the use of U.S. Environmental Protection Agency (USEPA) Tier 4 engines – localized construction emissions from the proposed Project would not exceed SCAQMD's Localized Significant Thresholds (LSTs). Therefore, impacts related to potential conflicts with the AQMP would be *less than significant*. |
| **Impact AQ-2** Construction activities associated with the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate air pollutant emissions; however, emissions of CO, $NO_x$, $SO_x$, $PM_{10}$, $PM_{2.5}$, and VOC, would not exceed South Coast Air Quality Management District's (SCAQMD's) regional significance thresholds for construction. On-site construction-related emissions | **MM AQ-1 Air Quality Management Plan.** The Beach Cities Health District (BCHD) shall prepare an Air Quality Management Plan for construction of the proposed Project, which shall be approved by the City of Redondo Beach and the City of Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. The plan shall include the following conditions for construction: | Implementation of MM AQ-1, which would include requirements for soil stabilization and the use of USEPA Tier 4 engines, would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD LSTs. Therefore, with implementation of MM AQ-1, impacts regarding localized construction emissions with |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| would exceed the Localized Significant Thresholds (LSTs) for $PM_{10}$ and $PM_{2.5}$. Therefore, the Project could expose sensitive receptors to substantial pollutant concentrations. However, this impact would be *less than significant with mitigation.* | • Construction equipment engines shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.<br>• All construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction to reduce the amount of particulate matter entrained in the ambient air. These measures include the following:<br>o Quick replacement of ground cover in disturbed areas.<br>o Watering of exposed surfaces three times daily.<br>o Watering of all unpaved haul roads three times daily.<br>o Covering all stock piles with tarp.<br>o Post signs on-site limiting traffic to 15 miles per hour (mph) or less on unpaved roads.<br>o Prohibit demolition when wind speed is greater than 25 mph.<br>o Sweep streets adjacent to the Project site at the end of the day if visible soil material is carried over to adjacent roads.<br>o Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.<br>o Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip.<br>• Construction activities associated with the proposed Project shall use U.S. Environmental Protection | mitigation incorporated would be *less than significant*. |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | Agency (USEPA) Tier 4 engines on all construction equipment, except crushing equipment, which would reduce diesel particulate matter (DPM) emissions from combustion by 94 percent for Phase 1 and 79 percent for Phase 2 construction.<br>• Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.<br>Construction contractors shall ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD shall demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction. | |
| **Impact AQ-3** Operational activities associated with the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate criteria air pollutant emissions that would be below South Coast Air Quality Management District (SCAQMD) mass daily thresholds and Localized Significance Thresholds (LSTs). Therefore, this impact would be *less than significant.* | No mitigation required | Less than significant |
| **Impact AQ-4** Construction-related diesel particulate matter (DPM) emissions – including emissions associated with the Phase 1 preliminary site development plan as well as emissions with the Phase 2 development program – would exceed the South Coast Air Quality Management District's (SCAQMD's) thresholds. However, this impact would be *less than significant with mitigation.* | Refer to MM AQ-1 above | With implementation of MM AQ-1, which requires use of USEPA Tier 4 engines on all construction equipment, mitigated DPM emissions generated during Project construction activities would not exceed SCAQMD's significance threshold. Therefore, impacts with mitigation |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | | incorporated would be *less than significant.* |
| **Impact AQ-5** The net increase in daily traffic, together with other cumulative traffic in the area, would generate increases in CO levels near local intersections. However, CO levels generated as a result of the proposed Project would not exceed Federal and State CO standards and would not result in CO hotspots. Therefore, this impact would be *less than significant.* | No mitigation required | Less than significant |
| **Impact AQ-6** None of the land uses included in the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in objectionable odors that would affect a substantial number of people. Therefore, this impact would be *less than significant.* | No mitigation required | Less than significant |
| **SECTION 3.3, *BIOLOGICAL RESOURCES*** | | |
| **Impact BIO-1** The proposed redevelopment of the Beach Cities Health District (BCHD) campus – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in the removal of landscaped trees, shrubs, and other non-native vegetation that may provide nesting and roosting habitat. With the implementation of pre-construction nesting bird surveys, if necessary, and new landscaping, the proposed Project would not substantially interfere with resident or migratory birds. Impacts would be *less than significant with mitigation*. | **MM BIO-1 Pre-Construction Nesting Bird Surveys.** To prevent impacts to nesting or roosting birds through loss or damage of mature trees, the Beach Cities Health District (BCHD) shall comply with the following:<br>• Where suitable vegetation and structures for nesting birds occur within 500 feet of construction activities, all phases of construction shall avoid the general nesting season (i.e., between February 15 and August 31) to the maximum extent practicable.<br>• If the nesting season cannot be avoided, a qualified biologist shall be retained to conduct a pre-construction survey for nesting birds. The survey shall be conducted within 72 hours prior to commencement of vegetation removal.<br>• If any nesting birds are present within or immediately adjacent to the construction area, the following shall be | Implementation of MM BIO-1 would require pre-construction nesting bird surveys to identify and avoid active nests during construction that occurs in the nesting season. With implementation of the recommended MM BIO-1 and compliance with Federal, State, and local regulations, impacts on biological resources – including resident and migratory birds provided with protection under the Migratory Bird Treaty Act and/or California Fish and Game Code – would be reduced to *less than significant.* |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | required: A qualified biologist shall be retained by BCHD to flag and demarcate the location of all nesting birds and monitor construction activities. Temporary avoidance of active nests, including the enforcement of an avoidance buffer as determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.<br>• If Federal or State protected species are observed during the site survey, consultation shall be completed with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to determine if work shall commence or proceed during the breeding season; and, if work may proceed, what specific measures shall be taken to ensure protected bird species are not affected. | |
| **SECTION 3.4, *CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES*** | | |
| **Impact CUL-1** Redevelopment of the Beach Cities Health District (BCHD) campus would include the proposed demolition of Beach Cities Health Center and the attached Maintenance Building during Phase 1 as well as the demolition of the existing parking structure and potentially the Beach Cities Advanced Imaging Center during Phase 2. However, no historic architectural resources exist on the campus and the proposed redevelopment of the campus would not damage or result in a substantial change in the historic setting of historic architectural resources in the vicinity of the Project site. Therefore, impacts would be *less than significant*. | No mitigation required | Less than significant |
| **Impact CUL-2** Ground disturbing activities associated with the proposed Project – particularly demolition of existing pavements and excavation of subterranean levels during Phase 1 and Phase 2 – | **MM CUL-1a Native American Monitoring.** Prior to the commencement of any ground disturbing activities at the Project site, the Beach Cities Health District (BCHD) shall retain a Native American Monitor approved by the Gabrieleño Band of Mission | Implementation of MM CUL-1a and -1b requires observation and monitoring of excavation and grading by a Native American tribal monitor |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| could uncover previously unknown prehistoric or historic archaeological deposits that qualify as archeological resources as defined in California Environmental Quality Act (CEQA) Guidelines Section 15064.5. Damage or destruction of any such archaeological resources would be considered a potentially significant impact. However, this impact would be *less than significant with mitigation*. | Indians-Kizh Nation. The Native American Monitor shall only be present on-site during the construction phases that involve ground-disturbing activities, defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, within the Project site. The Native American Monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Native American Monitor and Tribal Representatives have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.<br>Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (i.e., not less than the surrounding 100 feet) until the find can be assessed. All archaeological resources unearthed by ground disturbing activities shall be evaluated by the Native American Monitor. If the archaeological resources are Native American in origin, the Consulting Tribe shall retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.<br>If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the County coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5. Human remains and grave/burial goods shall be treated alike per Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (California Environmental Quality Act [CEQA] Guidelines Section 15064.5[f]).<br>**MM CUL-1b ~~Cultural Resources Monitoring Plan~~Archaeological Monitoring.** Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan | and a qualified archaeologist to identify any potential prehistoric or historic-period archaeological and/or tribal resources. MM CUL-1b also requires the preparation of a Treatment Plan to appropriately mitigate impacts to any such resources. In the case of an inadvertent discovery of historic-period archaeological ~~and/or tribal~~ resources, implementation of MM CUL-2 would halt construction activities within 50 feet to allow the Native American monitor and/or qualified archaeologist to evaluate the significance of the discovery and avoid potentially significant impacts (i.e., damage or destruction). Therefore, impacts to archeological resources as defined CEQA Guidelines Section 15064.5 with mitigation incorporated would be *less than significant.* |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | shall be developed by a qualified archaeologist~~, with provisions for review and input by representatives of the Native American tribe(s) that consulted on the project pursuant to Assembly Bill (AB) 52~~. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist and Native American tribal monitor shall be required during ground disturbing activities ~~—including (but not limited to) clearing/grubbing, excavations, grading, and trenching—~~during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist~~ and Native American tribal monitor~~. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary.<br>**MM CUL-2 Inadvertent Discoveries.** A qualified ~~professional~~ archaeologist ~~and approved Native American monitor~~ shall be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological ~~and/or tribal~~ resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | located more than ~~50~~ 100 feet from the find. ~~The qualified archaeologist and/or Native American monitor shall evaluate the significance of the discovery based on the Treatment Plan prior to resuming any activities that could impact the discovery. All tribal cultural resources unearthed by ground disturbing activities shall be evaluated by the Native American monitor. Any required testing or data recovery shall be directed by the qualified archaeologist and Native American monitor pursuant to the Treatment Plan.~~ The treatment of the archaeological resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. | |
| **Impact CUL-3** While unlikely, unknown, isolated Native American human remains could potentially be inadvertently uncovered during construction activities associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program. In the event of this occurrence, the Beach Cities Health District (BCHD) would immediately cease activity in the vicinity of the discovery and comply with existing regulations. Therefore, impacts would be *less than significant*. | No mitigation required. | Less than Significant |
| **Impact CUL-4** Potential tribal cultural resources, as defined in Public Resources Code Section 21074, | Refer to MM CUL-1a and -1b ~~and~~ as well as MM CUL-2 above | With incorporation of MM CUL-1a and -1b ~~and~~ as well as MM CUL-2, in |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| may be inadvertently uncovered during excavation and grading associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program. Damage or destruction of such tribal cultural resources would be a potentially significant impact. However, impacts would be reduced to *less than significant with mitigation.* | | the event of an unanticipated discovery there would be a clear Treatment Plan and any required testing or data recovery would be completed, as necessary. Therefore, impacts to tribal cultural resources, as defined in Public Resources Code Section 21074 with mitigation incorporated would be *less than significant.* |
| **SECTION 3.5, *ENERGY*** | | |
| **Impact EN-1** The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not result in wasteful, inefficient, or unnecessary energy consumption. Conformance with of State regulations including the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11) as well as conformance with the Redondo Beach and Torrance General Plans and Climate Action Plans would ensure that this impact would be *less than significant*. | No mitigation required | Less than significant |
| **Impact EN-2** The proposed Project – including the Phase 1 preliminary site development plan as well as the Phase 2 development program – would conform with State regulations including the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11) as well as the Redondo Beach and Torrance General Plans, Climate Action Plans, and other applicable local plans for renewable energy and energy efficiency. Therefore, this impact would be *less than significant*. | No mitigation required | Less than significant |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| **SECTION 3.6, *GEOLOGY AND SOILS*** | | |
| **Impact GEO-1** Compliance with all applicable State and local regulations as well as the recommendations of the Geotechnical Report would ensure that the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. Potential impacts would be *less than significant with mitigation*. | **MM GEO-1 Geotechnical Report Recommendations.** The proposed Project shall comply with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the proposed Project. ~~These recommendations shall be reviewed by~~ The Beach Cities Health District (BCHD) shall incorporate these recommendations into all final grading plans, design drawings, and construction plans, as appropriate, prior to the issuance of any demolition or grading permits and shall submit the appropriate plans to the City of Redondo Beach and the City of Torrance Building & Safety Divisions ~~and formalized on all final grading plans, design drawings, and construction plans, as appropriate,~~ prior to the issuance of any demolition or grading permits. City of Redondo Beach and City of Torrance permit compliance staff shall review all final grading plans, design drawings, and construction plans, as appropriate, and observe ~~and~~ earthwork and grading to ensure compliance with these recommendations and specifications ~~during grading and construction activities associated with the proposed Project~~. | Required compliance with the California Building Code (CBC) along with the implementation of the recommendations in the Geotechnical Report prepared for the proposed Project would reduce the risk of potential impacts associated with geologic hazards. Therefore, impacts involving strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides with mitigation incorporated would be *less than significant*. |
| **Impact GEO-2** The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would redevelop the existing Beach Cities Health District (BCHD) campus. The proposed Project would not result in substantial soil erosion or the loss of topsoil. While the construction of the proposed Project would involve excavation of soils and grading, compliance with applicable State and local regulations would ensure potential impacts would be *less than significant*. | No mitigation required | Less than significant |
| **Impact GEO-3** The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not be located on an unstable geologic unit or | No mitigation required | Less than significant |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| soil that is made unstable as a result of the proposed Project or an expansive soil creating a substantial risk to life or property. Compliance with all applicable State and local regulations as well as the recommendations of the Geotechnical Report would ensure that potential impacts associated with the proposed Project would be *less than significant.* | | |
| **Impact GEO-4** The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would require excavations below fill soils placed during previous grading activities. However, the geologic unit that is likely to be affected by these excavations has a low potential to contain paleontological resources. Therefore, adherence with applicable mitigation measures would ensure potential impacts would be *less than significant with mitigation.* | **MM GEO-2a Worker Paleontological Resource Awareness Session.** In order to educate construction contractors regarding the protection of any paleontological resources that are unexpectedly discovered during excavations associated with the proposed Project, The Beach Cities Health District (BCHD) shall retain a qualified paleontologist to develop a worker awareness program to educate all workers regarding the paleontological resources that, while unlikely, may occur on the development site as well as appropriate procedures to enact should paleontological resources be discovered during development. The qualified paleontologist shall develop appropriate training materials including, but not limited to, a summary of geologic units present at the Project site by depth, a description of potential paleontological resources that may be encountered during the proposed excavations, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to the initiation of excavation and grading activities or prior to the start of work on-site for new workers hired after the initial awareness session. BCHD shall provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested.<br>**MM GEO-2b Paleontological Resources Inadvertently Discovered During Ground-Disturbing Activities.** In the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities the following actions would be implemented by the construction contractor to prevent potential significant impacts on paleontological resources: | Implementation of MM GEO-2a would ensure that workers are trained to identify and properly handle potential paleontological resources discovered on-site during construction activities. MM GEO-2b sets forth specific actions to prevent potentially significant impacts to paleontological resources in the case of discovery. Therefore, impacts with mitigation incorporated would be *less than significant*. |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | • Temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made.<br>• Immediately notify the City of Redondo Beach and/or the City of Torrance regarding the resource and redirected ground-disturbing activity.<br>• Obtain the services of a qualified professional paleontologist who shall assess the significance of the find and provide recommendations, as necessary, for its proper disposition.<br>• Complete all significance assessment and mitigation of impacts to the paleontological resource prior to resuming ground-disturbing activities in the area of the find. | |
| **SECTION 3.7, *GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE*** | | |
| **Impact GHG-1** The proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – would not generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Therefore, this impact would be *less than significant*. | No mitigation required | Less than significant |
| **SECTION 3.8, *HAZARDS AND HAZARDOUS MATERIALS*** | | |
| **Impact HAZ-1** The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not create a hazard to the environment or public health through the temporary or routine transport, use, or disposal of hazardous materials. | No mitigation required | Less than significant |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| Compliance with Federal, State, and local regulations would ensure that any such impact would be *less than significant*. | | |
| **Impact HAZ-2** The proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – could create a hazard to the environment or public health through reasonably foreseeable upset and accident conditions involving the disturbance of hazardous materials during demolition as well as excavation, trenching, and grading. Impacts would be *less than significant with mitigation.* | **MM HAZ-1 Asbestos-Containing Material (ACM), Lead-Based Paint (LBP), polychlorinated biphenyls (PCBs), and Mold Surveys.** Prior to the issuance of a demolition permit by the Redondo Beach Building & Safety Division, the Beach Cities Health District (BCHD) shall retain a licensed contractor to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and potentially the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, BCHD and the licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. During construction the licensed contractor shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed.<br>**MM HAZ-2a Soils Management Plan.** Prior to approval of issuance of demolition, grading, or building permit by the Redondo Beach Building & Safety Division and/or approval of a grading plan by the City of Redondo Beach Building & Safety Division and the City of Torrance Building & Safety Division, the Beach Cities Health District (BCHD) shall prepare and submit a Soils Management Plan and a Transportation Plan to the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and Los Angeles Regional Water Quality Control Board (RWQCB) as well as the City of Redondo Beach and City of Torrance, for review. The Soils Management Plan and | Implementation of standard regulatory measures, best management practices, and MMs HAZ-1, HAZ-2a through -2d, and HAZ-3 would require methods and procedures to reduce and/or eliminate potential impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials or environmental contamination into the environment. Therefore, impacts with mitigation incorporated would be *less than significant*. |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | Transportation Plan shall include, but shall not be limited to the following:<br><br><u>Soils Management Plan</u><br><br>Affected soils shall be either directly loaded into awaiting trucks for immediate off-site disposal or temporarily stockpiled on plastic sheeting prior to load-out and off-site disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came.<br><br>Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following:<br><br><u>Soil and Material Segregation</u><br><br>Overburden soils shall be screened with an Organic Vapor Analyzer (OVA) in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166. Any significant quantities of construction debris encountered during excavation shall be segregated and disposed of in accordance with Federal, State, and local regulations. Soil cuttings during the excavation and installation of soldier piles shall be disposed of off-site with any affected soils from the deep excavation.<br><br><u>Stockpile Management</u><br><br>The stockpiled soils for load-out shall be segregated by waste classification:<br><br>• Non-hazardous waste.<br>• Volatile organic compound (VOC)-contaminated non-hazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm.<br>• VOC-contaminated non-hazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and placed in a sealed container (roll-off bin) or directly | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | loaded into a suitable transport truck, moistened with water, and covered with a tarp for off-site transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan.<br>The temporary stockpiles containing affected soils shall be managed as follows:<br>• The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust.<br>• The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.<br>• Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made.<br>• If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations.<br>• During stockpile generation and removal, only the working face of the stockpile shall be uncovered.<br><u>Decontamination Methods and Procedures</u><br>Each piece of equipment used for the excavation of affected soils shall have a clean-out bucket or continuous edge across the cutting face of its bucket. No excavation of affected soil shall be permitted with equipment utilizing teeth across the cutting edge of its bucket. | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the on- and off-site distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas.<br>Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out.<br>Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated, but shall be packaged for appropriate off-site disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures:<br>• Non-phosphate detergent and tap-water wash, using a brush if necessary.<br>• Tap-water rinse.<br>• Initial deionized/distilled water rinse.<br>• Final deionized/distilled water rinse. | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | Truck Loading<br>Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed, and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following:<br>• Materials shall be transported to an approved treatment/disposal facility.<br>• No excavated material shall extend above the sides or rear of the truck/trailer.<br>• Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.<br>• The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material off-site.<br>Storm Water Management<br>General construction best management practices (BMPs) identified by the Los Angeles RWQCB shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with Federal, State, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include: | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | • Pumping the standing water into temporary aboveground storage tanks for reuse on-site for dust suppression.<br>• Pumping the standing water through filters and a carbon adsorption filter (if required based on analytical results) prior to discharge to a storm drain.<br>• Pumping the standing water into vacuum trucks for transport and disposal at a recycling facility.<br>Transportation Plan<br>All affected soils shall be transported off-site for lawful management and disposal. Prior to load-out, the construction contractor shall prepare waste profiles for the receiving facility using analytical data from the previous environmental site assessment.<br>**MM HAZ-2b Soil Vapor Monitoring.** During soil disturbance activities with the potential to disturb tetrachloroethylene (PCE)-contaminated soil, soil vapor monitoring shall be conducted by the construction contractor using a photoionization detector (PID) 10.6 or 11.7 eV lamp. Use of the PID shall ensure that the Occupational Safety and Health Administration (OSHA) exposure limits for PCE and other volatile organic compounds (VOCs) are maintained. In the event that the OSHA exposure limits are exceeded, work within the confined space would be temporarily stopped until the use of a Soil Vapor Extraction (SVE) vacuum blower reduces it to below this limit (see MM HAZ-2c).<br>**MM HAZ-2c Soil Vapor Extraction (SVE) Equipment.** Use of an SVE vacuum blower (e.g., regenerative blowers, rotary lobe blowers, rotary claw blowers, centrifugal fan blowers, etc.) shall be implemented during construction within confined spaces, as necessary, to maintain Occupational Safety and Health Administration (OSHA) exposure limits ~~or trichloroethylene~~ for tetrachloroethylene (PCE) and other volatile organic compounds (VOCs).<br>**MM HAZ-2d Discovery of Contamination.** In the event that previously unknown or unidentified soil and/or groundwater | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer, or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., Los Angeles County Fire Department [LACoFD] and Los Angeles Regional Water Quality Control Board [RWQCB]). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration (OSHA) requirements shall be prepared and in place prior to commencement of work in any contaminated area.<br>**MM HAZ-3 Well Review Program.** Prior to demolition or ground-disturbing activities on the vacant Flagler Lot, the Beach Cities Health District (BCHD) shall enroll in the California Geologic Energy Management Division's (CalGEM's) Well Review Program. Following enrollment in the Well Review Program CalGEM would:<br>• Identify/confirm the location of the previously abandoned and plugged oil and gas well on the property.<br>• Provide a review of the previously abandoned and plugged oil and gas well located on the Project site. The review process shall consist of determining the | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | abandonment status of the well by examining past plugging operations, and then comparing the abandonment status with current abandonment standards.<br>• Provide an evaluation of all known wells located on the development site property. The evaluation process will consist of: 1) verifying that the previously abandoned and plugged oil and gas well has a competent surface plug; and 2) verifying the wells are not leaking any fluids or gas. BCHD shall be responsible for the removal of all metal plates attached to the top of casings of the well prior to the evaluation to prevent the buildup of methane gas underneath metal plates. Following evaluation, a metal identification plate shall be welded (without full bead) to the top of the well casing to allow any potential gas leakage to vent out of the casing and prevent pressure from building up in the wellhead. For identification purposes, the metal identification plate shall show the well's name and Assessor Parcel Identification number.<br>• Ensure proper well restoration following evaluation. Proper well site restoration shall include the removal of all associated well equipment, junk, and debris and any well excavation needs to be filled with earth, compacted properly to prevent settling, and graded over. Pursuant to California Code of Regulations (CCR) Section 1776, well site restoration must be completed within 60 days following the evaluation of a well.<br>• Issue a Well Review Letter to BCHD and local permitting agencies (i.e., the City of Redondo Beach and the City of Torrance). The Well Review Letter will list the current status of all known wells located on the development site property, and it will provide other | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | important information associated with development near oil or gas wells.<br>BCHD shall adhere to all recommendations provided by CalGEM, which may include maintaining rig access to the well, avoiding building over or in close proximity to the well, and implementing surface mitigation measures that are determined necessary by CalGEM. Surface mitigation measures may include installation of venting systems for wells, venting systems for parking lots, patios, and other hardscape, methane barriers for building foundations, methane detection systems, and collection cellars for well fluids by a licensed Professional Engineer. The permitting of surface mitigation measures shall fall under the authority of the City of Redondo Beach and the City of Torrance. | |
| **Impact HAZ-3** The proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a 0.25-mile radius of an existing or proposed school. Compliance with Federal, State, and local regulations would ensure that any such impact would be *less than significant*. | No mitigation required | Less than significant |
| **Impact HAZ-4** The proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 65962.5, which could create a significant hazard to the public or the environment. Compliance with all applicable regulations and mitigation measures would reduce this impact to *less than significant with mitigation*. | Refer to MM HAZ-2a through -2d above | Implementation of MM HAZ-2a through -2d would require methods and procedures to ensure volatile organic compounds (VOC) compounds and contaminated soils are properly detected, removed, and handled during ground disturbing activities associated with the proposed Project. Therefore, impacts related to hazards to the public or the environment with mitigation incorporated would be *less than significant*. |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| **Impact HAZ-5** The proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be *less than significant*. | No mitigation required | Less than significant |
| **SECTION 3.9, *HYDROLOGY AND WATER QUALITY*** | | |
| **Impact HYD-1** Neither construction nor operation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in a violation of water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. The proposed Project would comply with existing regulations and plans to ensure the potential impacts to water quality would be *less than significant*. | No mitigation required | Less than significant |
| **Impact HYD-2** Construction and operation of the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would not require dewatering activities or otherwise substantially deplete groundwater supplies. The proposed Project would increase groundwater recharge by increasing pervious surface area and improving the existing infiltration system; therefore, there would be a minor *beneficial* impact. | No mitigation required | Less than significant |
| **Impact HYD-3** The proposed Project would involve the construction of an on-site infiltration system to facilitate groundwater recharge and eliminate stormwater drainage to the City of Torrance municipal storm drain system by abandoning the existing infrastructure that discharges to Flagler Lane in place. Additionally, the proposed Project – including the Phase 1 preliminary development plan and the more general Phase 2 development program – would not contribute additional runoff to the City | No mitigation required | Less than significant |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| of Redondo Beach municipal storm drain system that would exceed existing capacity or increase sources of polluted runoff. The proposed Project would comply with existing regulations and plans to ensure the potential impacts related to drainage would be *less than significant*. | | |
| **Impact HYD-4** The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan – including the Ocean Plan, Los Angeles Basin Plan, Groundwater Basin Master Plan (GBMP), and the California Water Service Company (Cal Water) Urban Water Management Plan (UWMP). Therefore, impacts would be *less than significant*. | No mitigation required | Less than significant |
| **SECTION 3.10, *LAND USE AND PLANNING*** | | |
| **Impact LU-1** The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not cause a significant environmental impact due to a conflict with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Impacts associated with the proposed Project would be *less than significant.* | No mitigation required | Less than significant |
| **SECTION 3.11, *NOISE*** | | |
| **Impact NOI-1** Construction activities associated with proposed Project – including the Phase 1 preliminary development plan and the more general Phase 2 development program – would result in a temporary, but prolonged increase in noise levels at | **MM NOI-1 Construction Noise Management Plan.** The Beach Cities Health District (BCHD) shall prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions, in accordance with Torrance Municipal Code (TMC) Section 46.3.1. The Construction Noise Management | Implementation of MM NOI-1 and compliance with the Redondo Beach and Torrance Noise Regulations would reduce construction noise impacts; however, feasible noise |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| the following noise-sensitive residential areas: 1) Beryl Street between North Prospect and Flagler Lane; 2) Flagler Lane and Flagler Alley between Beryl Street and North Prospect Avenue; 3) Diamond Street between Flagler Alley and North Prospect Avenue; and, 4) North Prospect Avenue between Diamond Street and Beryl Street. While compliance with the Redondo Beach and Torrance Noise Regulations and implementation of a Construction Noise Management Plan would reduce construction noise, construction noise levels would exceed Federal Transit Administration (FTA) thresholds and this impact would remain *significant and unavoidable* during both Phase 1 and Phase 2 of the proposed Project. | Plan would address noise and vibration impacts and identify measures that would be used to reduce impacts. At a minimum measures would include:<br>• Construction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday ~~to the maximum extent feasible,~~ in accordance with Redondo Beach Municipal Code (RBMC) Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1.<br>• BCHD and its contractors and subcontractors shall coordinate approvals with the City of Redondo Beach and the City of Torrance and construct noise barriers to reduce noise levels to on- and off-site sensitive receptors, where feasible:<br>  o During Phase 1, noise barriers containing sound-absorbing materials would be constructed to a height that blocks the line-of-sight to sensitive receptors to the maximum extent feasible taking into account environmental constraints (e.g., wind loading, property ownership, etc.).<br>  o During Phase 2, noise barriers containing sound-absorbing materials would be constructed to a height that blocks the line-of-sight to sensitive receptors to the maximum extent feasible taking into account environmental constraints (e.g., wind loading, property ownership, etc.).<br>• BCHD's construction contracts shall require implementation of the following construction best management practices (BMPs) by all construction contractors and subcontractors working in or around the Project site to reduce construction noise levels: | barrier heights do not reduce noise levels for construction activities occurring above 30 feet. These construction activities would result in noise levels that would exceed the FTA residential criterion. Therefore, noise impacts resulting from construction of the proposed Project with mitigation incorporated would remain *significant and unavoidable*. |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | ○ BCHD and its contractors and subcontractors shall ensure that construction equipment is properly muffled according to manufactures specifications or as required by the Redondo Beach and City of Torrance Building & Safety Division, whichever is the more stringent.<br>○ BCHD and its contractors and subcontractors shall use electrically powered tools and facilities to the maximum extent feasible. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.<br>○ BCHD and its contractors and subcontractors shall place noise-generating construction equipment and locate construction staging areas away from on-site and off-site sensitive uses (e.g., centrally on the existing campus), where feasible, to the satisfaction of the Redondo Beach and Torrance Building & Safety Divisions.<br>• BCHD's construction contracts shall include the requirement that construction staging areas, construction worker parking and the operation of earthmoving equipment within the Project site, are located as far away from noise-sensitive sites as feasible. Contract provisions incorporating the above requirements shall be included as part of the construction documents, which shall be reviewed and approved by the City of Redondo Beach and Torrance Building & Safety Divisions prior to issuance of demolition or grading permits.<br>• BCHD's construction contracts shall include the requirement that haul trucks remain on the designated haul routes identified in the Redondo Beach and Torrance General Plans. Further, haul trucks should attempt to | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | operate in traffic lanes that are located at the greatest distance from sensitive receptors, typically the lane nearest the roadway centerline on a four-lane roadway. Contract specifications shall be included in the proposed Project's construction documents, which shall be reviewed by the Redondo Beach and Torrance Building & Safety Divisions prior to issuance of demolition or grading permits.<br>At least 1 month prior to the initiation of construction-related activities during Phase 1 and Phase 2, BCHD shall prepare and distribute notices to residents and businesses located within a 0.25-mile radius of the Project site. At a minimum, the notices shall describe the overall construction schedule, advise residents, business owners, and employees of increased construction-related noise.<br>During construction, BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues. | |
| **Impact NOI-2** Ground-borne vibration levels generated during construction of the proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – would be below Federal Transit Administration (FTA) thresholds for on-site construction activities but would exceed FTA thresholds for off-site haul truck operations. Nevertheless, impacts to sensitive receptors | **Recommended MM NOI-2 Haul and Delivery Truck Operations.** Where feasible, haul and delivery truck operations associated with Phase 1 and Phase 2 development would enter and exit the Project site utilizing Lane 1 (the lane farthest from residences) along the given haul route. | According to the FTA, the proposed Project would have no impact even if the existing vibration exceeds the standard vibration criteria so long as the number of events does not increase significantly (i.e., approximate doubling of events) and the vibration does not exceed the existing vibration by 3 dBA or more (FTA 2018). Haul truck operations associated with Phase 1 and Phase 2 |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| associated with construction vibration would be *less than significant*. | | would not resulting in the doubling of events, would be temporary in nature, and would not exceed the existing vibration by 3 dBA or more. Therefore, vibration levels from construction equipment and haul trips associated with BCHD development would be *less than significant*. While not required to reduce impacts to *less than significant*, the recommended mitigation measure MM NOI-2 would be implemented to further reduce noise levels for off-site residential uses from haul truck trips during construction associated with the proposed Project. |
| **Impact NOI-3** Operational noise associated with the proposed Project – particularly noise associated with outdoor events (e.g., movie nights, farmers' markets, fitness classes, etc.) – would result in potentially significant noise impacts. However, operational noise impacts would be *less than significant with mitigation*. | **MM NOI-3a Delivery Truck Hours and Idling.** Deliveries from heavy-duty trucks, including refrigerator trucks, trash and recycling pick-ups, and parking lot sweeping, shall be restricted to daytime operating hours (7:00 a.m. to 4:00 p.m.); idling longer than 5 minutes in the same period shall be prohibited.<br>**MM NOI-3b Events Management Plan.** The Beach Cities Health District (BCHD) shall prepare an Event Management Plan, which shall include, but is not limited to, establishment of procedures to limit noise generated by operations on the proposed BCHD Healthy Living Campus, particularly for outdoor events. The Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC). Limitations on outdoor events shall include prohibiting the use of amplification systems for outdoor events after 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria and review of the proposed sound system by a qualified acoustical engineer to ensure that event set ups would meet the acceptable | Implementation of MM NOI-3a would eliminate noise impacts associated with heavy-duty delivery trucks and would reduce daytime noise impacts associated with heavy-duty delivery trucks by prohibiting idling longer than five minutes. Implementation of MM NOI-3b would substantially reduce operational noise associated with outdoor fitness classes and community events. Implementation of MM NOI-3c would ensure that outdoor activities at the Aquatic Center are concluded by 10:00 p.m. With required compliance with RBMC Section 4-24.301 and TMC Section 6-46.7.2, as well as the implementation of MM NOI-3a, -3b, |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | exterior noise criteria of 50 to 55 A-weighted decibels (dBA) consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2.<br>**MM NOI-3c Outdoor Pool Activities.** The Aquatics Center, specifically the outdoor pool and deck area, would close operations by 10:00 p.m. to comply with Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC) lower nighttime noise level criteria. | and -3c, impacts associated with proposed Project operations with mitigation incorporated would be *less than significant*. |
| **SECTION 3.12, *POPULATION AND HOUSING*** | | |
| **Impact PH-1** The proposed Residential Care for the Elderly (RCFE) Building would provide a total of 217 on-site residential units, including 60 replacement Memory Care units and 157 new Assisted Living units. Additionally, the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would create a total of approximately 170 new jobs on the campus. However, the anticipated increase in population within Redondo Beach, Torrance, and the surrounding cities would be minor and well within the forecasted population growth for the region. The proposed Project would not induce substantial population growth and impacts would be *less than significant*. | No mitigation required | Less than significant |
| **SECTION 3.13, *PUBLIC SERVICES*** | | |
| **Impact PS-1** The proposed Project – including the Phase 1 preliminary site development plan under Phase 1 and the more general Phase 2 development program – could incrementally increase the demand for the Redondo Beach Fire Department (RBFD) fire protection and Emergency Medical Services (EMS) services as well as other non-emergency services. However, this increase would not result in substantial adverse physical impacts associated with the | No mitigation required | Less than significant |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. This impact would be *less than significant.* | | |
| **Impact PS-2** The implementation of the proposed Project – including the preliminary development plan under Phase 1 and the development program under Phase 2 – would incrementally increase the demand for law enforcement services. However, the required compliance with existing building security standards (e.g., Redondo Beach Municipal Code [RBMC] Section 9-15.01) would ensure that implementation of the Project would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered police protection and Emergency Medical Services (EMS) services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. This impact would be *less than significant.* | No mitigation required | Less than significant |
| **SECTION 3.14, *TRANSPORTATION*** | | |
| **Impact T-1** The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not cause significant environmental impacts due to conflicts with any transportation plan, policy, or regulation. Therefore, impacts would be *less than significant with mitigation*. | Refer to MMs T-1 and T-2 below | The implementation of recommended MM T-1 would require the preparation of a TDM plan consistent with the requirements of RBMC Section 10-2.2406. The TDM plan would describe trip reduction strategies such as transit and carpool incentives for employees (e.g., designated parking for carpools and vanpools on-site), intended to reduce single-occupancy vehicle trips to the |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | | Project site. Implementation of MM T-2 would require the preparation of a Construction Traffic and Access Management Plan, which would include provisional measures to reduce construction traffic and maintain public safety. With the implementation of these mitigation measures, the proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system and impacts would be *less than significant*. |
| **Impact T-2** Additional vehicle miles traveled (VMT) generated during construction would be minimized with implementation of a Construction Traffic and Access Management Plan. Long-term operation of the proposed Project would generate an incremental increase in VMT that would be *less than significant*. | **Recommended MM T-1 Transportation Demand Management (TDM) Plan.** The Beach Cities Health District (BCHD) would prepare and implement a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors. The TDM plan would be prepared by a qualified transportation engineer/planner and overseen by a TDM Coordinator to be designated by BCHD. The TDM plan would be developed prior to the issuance of a Conditional Use Permit (CUP) for Phase 1 of the proposed Project and would be continuously maintained and adjusted as needed. | With implementation of recommended MM T-1, the proposed Project would implement a TDM plan with trip reduction strategies such as transit and carpool incentives for employees (e.g., designated parking for carpools and vanpools on-site), to reduce single-occupancy vehicle trips to the Project site. Implementation of MM T-2 below would reduce construction VMT impacts by requiring the preparation of a Construction Traffic and Access Management Plan, which would include provisional measures to reduce construction traffic, maintain public safety, and reduce associated VMT. Although not required to mitigate a significant impact, MM T-1 is recommended to assist in implementing the Project's proposed TDM plan by describing its |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | The BCHD TDM Coordinator would monitor employee, tenant, and visitor mode share with annual surveys and develop annual reports for submittal to the BCHD Board of Directors. The surveys shall capture trip origin data, travel mode, rideshare (e.g., number of people in the party), and other key data and indicators for TDM program performance relative to vehicle miles traveled (VMT) (e.g., employee incentives for bicycling to work). The BCHD TDM Coordinator would ensure that monitoring efforts capture all BCHD-related travel behavior. Annual monitoring reports would include trip length surveys completed at least biannually by a sample of BCHD employees and tenants by BCHD employees (e.g., trip origin data collection). Survey results would be used to determine the appropriate TDM measures to employ in the coming year to maximize reductions in VMT per capita, champion transit and alternative mode transportation to BCHD employees, develop appropriate incentives to increase BCHD's transit mode share incrementally over time, and develop effective marketing tools to advertise transit and non-vehicular travel mode availability and incentives.<br>Each annual TDM Program monitoring report would:<br>• Describe the TDM efforts in place at the time to reduce vehicular trips;<br>• Summarize collected employee and tenant survey data and results;<br>• Evaluate survey data and results, comparing trends and annual changes;<br>• Evaluate change in available transportation infrastructure and programs serving the campus;<br>• Provide recommendations for adjustments to the TDM Program to adaptively manage VMT reductions for employees, tenants, and visitors. | requirements. Therefore, impacts related to increased VMT during construction and operation with mitigation would be *less than significant*. |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | The TDM Coordinator would oversee annual monitoring and reporting to evaluate the effectiveness of the TDM measures being implemented at the campus and recommend adjustments as needed to the TDM plan on an annual basis. Final annual reports and data (e.g., survey data) shall be shared with the cities of Redondo Beach and Torrance and made readily available for public review and use. Information regarding the TDM plan shall be distributed to all BCHD employees and tenants and shall be posted on BCHD's website and other marketing materials for BCHD visitors and updated annually as needed based on the annual reports.<br>The TDM Coordinator would consider a range of measures for the TDM plan to reduce employee and visitor VMT per capita, including, but not limited to, the following:<br>• Provide employee incentives to participate in a vanpool program and regularly advertise the opportunities to vanpool through a variety of employee communication formats.<br>• Partner with rideshare companies such as Uber or Lyft to guarantee availability of an emergency ride home or provide access to ~~City~~ BCHD vehicles for this purpose.<br>• Offer employee TDM benefits for use of active transportation commuter modes, including ridesharing, transit, bicycling, walking, carpool/vanpool, etc. Incentives for BCHD employees could include flexible scheduling or options for telecommuting.<br>• Maximize opportunities for BCHD employees to telecommute as part of regular scheduling.<br>• Provide a transportation information center and wayfinding signage for nearby Beach Cities Transit Line 102 bus stops.<br>• Expand the proposed onsite bicycle facilities (i.e., shower, racks, and lockers) for BCHD employees in an amount and location informed by annual employee surveys and monitoring reports. | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | • Encourage bicycles as a primary commute mode for employees and provide incentives for biking to work, including providing free or discounted equipment to employees such as helmets, locks, bicycle commuter gear, and bicycles (electric or non-electric).<br>• Coordinate with the cities of Redondo Beach and Torrance to identify and facilitate new bicycle paths between the campus and neighboring communities, particularly linkages to existing bicycle path segments. BCHD and the cities of Redondo Beach and Torrance shall ensure that all bicycle paths to the campus are well-signed, provide lighting, and are regularly patrolled by law enforcement.<br>• Provide commuter clubs for BCHD employees and campus visitors to support a collaborative approach to TDM.<br>• Maintain and expand onsite bicycle parking for BCHD visitors in an amount and location informed by visitor surveys and annual monitoring reports.<br>  o Maintain and expand short-term bicycle parking within the campus to meet changing demands evaluated in the TDM Program annual reports.<br>  o Provide well-lit, clearly signed, bicycle parking that is convenient and in close proximity to the Entry Plaza to encourage bicycling by visitors.<br>  o Provide secure short-term bicycle parking and/or a bicycle parking attendant, bicycle valet, or indoor bicycle parking facility to prevent theft and ensure parking availability for BCHD visitors. | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | ○ Design bicycle racks with space-efficient configurations, such as vertically staggered racks and two-tier racks.<br>○ Provide a bike share station at the campus as a part of the Metro Bike Share, or a new bike share program specific to BCHD. Funding shall be determined based on the area required for the bicycle station. The bicycle share station shall be well-lit and located at a safe and convenient location adjacent to the Entry Plaza. | |
| **Impact T-3** Construction traffic hazards would be mitigated by implementation of a Construction Traffic and Access Management Plan. Operation of the proposed Project may increase hazards for pedestrians and transit along eastbound Beryl Street due to the proposed new driveway entrance at the Flagler Lot. Construction and operational impacts related to hazards due to design features would be *less than significant with mitigation*. | **MM T-2 Construction Traffic and Access Management Plan.** Following preparation of the final design plan for Phase 1 of the proposed Project, the Beach Cities Health District (BCHD) shall expand upon the Construction Traffic Control Plan and prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be subject to review and approval by ~~BCHD,~~ the California Department of Transportation (Caltrans), County Department of Transportation (DOT), ~~and~~ Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department prior to issuance of a Conditional Use Permit (CUP). The Construction Traffic and Access Management Plan shall be designed to:<br>• Prevent traffic impacts on the surrounding roadway network;<br>• Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable;<br>• Ensure safety for both construction workers and the surrounding community; and<br>• Prevent substantial truck traffic through residential neighborhoods.<br>The Plan shall, at a minimum, include the following: | Implementation of MM T-2 would require the preparation of a construction traffic and access management plan which would identify haul truck routes and traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction flaggers, etc.) that would be in place throughout the duration of construction and would reduce construction-related traffic hazards to *less than significant*. Additionally, implementation of MM T-3 would relocate the existing the existing Beach Cities Transit Line 102 northbound bus stop along eastbound Beryl Street and would reduce operational impacts associated with sight distance and vehicle-bus conflicts at the proposed one-way driveway along Beryl Street to *less than significant*. |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | • Designated haul routes consistent with the Redondo Beach and Torrance General Plan designations;<br>• On-site staging areas, which would avoid residential streets to the maximum extent feasible;<br>• Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction flaggers at the three driveways along North Prospect Avenue as well as the proposed driveways along Beryl Street and Flagler Lane) to address circulation requirements and public safety in accordance with the standards in the County DOT Area Traffic Control Handbooks;<br>• Emergency access provisions (i.e., North Prospect Avenue and Beryl Street); ~~and~~<br>• ~~Construction crew parking.~~On-site construction crew parking to the maximum extent feasible; and<br>• Prohibition of crew parking in adjacent residential neighborhoods.<br>Ongoing Requirements throughout the duration of construction:<br>• A detailed Construction Traffic Control Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. Such plans shall be reviewed and approved by the Redondo Beach Community Development Department, Redondo Beach Public Works Department, and Torrance Community Development Department prior to issuance of a demolition, excavation, grading, or building permit and implemented in accordance with this approval.<br>• Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed contingent upon the | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | issuance of an after-hours construction permit from the Redondo Beach Public Works Department Engineering Division and Torrance Community Development Department.<br>• Streets and equipment shall be cleaned in accordance with established Redondo Beach and Torrance Public Works Department requirements.<br>• Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself.<br>• Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current City of Redondo Beach permit.<br>Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction:<br>• Prior to implementation of Phase 1 and Phase 2 of the proposed Project, BCHD shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, and media listing/notification) as well as provide a call line for complaints and concerns regarding construction traffic.<br>• BCHD shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, Redondo Beach Fire Department [RBFD], Redondo Beach Police Department [RBPD], Torrance Fire Department [TFD], and Torrance Police Department [TPD], Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet | |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| | prior to implementation of Phase 1 and Phase 2 of the proposed Project.<br>• BCHD shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks or longer per each submittal.<br>• BCHD shall obtain approval from the cities of Redondo Beach and Torrance of any haul routes for earth, concrete, or construction materials and equipment hauling.<br>• BCHD shall obtain an Excavation Permit, Street/Lane Closure Permit, Sewer Permit, Demolition Permit, and any other applicable permits for construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way.<br>**MM T-3 Relocation of Beach Cities Transit Line 102.** To implement the proposed one-way driveway and pick-up/drop-off zone on Flagler Lot, the Beach Cities Health District (BCHD) shall work with the Redondo Beach Community Services Department Transit Division to relocate the existing Beach Cities Transit Line 102 northbound bus stop along eastbound Beryl Street. The bus stop shall be located along the south side of Beryl Street between the proposed one-way driveway entrance to the west and the intersection with Flagler Lane to the east. All proposed transit stop improvements shall be incorporated into final plans and reviewed and approved by the Redondo Beach Community Services Department Transit Division prior to the issuance of permits for these improvements. | |
| **Impact T-4** Emergency access to the Project site is currently adequate and would be maintained following the construction of the proposed Project. During construction, emergency access could be impeded due to haul truck traffic, temporary lane closures, or other construction activities. However, with implementation of a Construction Traffic and Access Management Plan, impacts of construction on | Refer to MM T-2 above | Implementation of MM T-2 would require the preparation and implementation of a Construction Traffic and Access Management Plan, which would identify noticing requirements for the Redondo Beach Fire Department (RBFD) and Redondo Beach Police Department |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| emergency access would be *less than significant with mitigation*. | | (RBPD). Additionally, the Construction Traffic and Access Management Plan would provide for emergency access throughout the duration of construction. Therefore, impacts with mitigation incorporated would be *less than significant*. |
| **SECTION 3.15, *UTILITIES AND SERVICE SYSTEMS*** | | |
| **Impact UT-1** Implementation of the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would increase the overall operational water demand at the Project site. However, with the exception of on-site trenching for the new connection to the 8-inch water line located along North Prospect Avenue, the proposed Project would not require or result in the substantial construction or expansion of existing water facilities. Therefore, potential impacts to water infrastructure would be *less than significant*. | No mitigation required | Less than significant |
| **Impact UT-2** The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in an overall increase in water demand, but this water demand would be adequately met by existing and planned future water supplies. This impact would be *less than significant*. | No mitigation required | Less than significant |
| **Impact UT-3** Implementation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in an increase in operational wastewater generation at the Project site as compared to existing conditions. Environmental effects associated with the | No mitigation required | Less than significant |

**Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts**

| Impacts | Mitigation Measures | Residual Impacts |
|---|---|---|
| construction of wastewater facilities would be *less than significant*. | | |
| **Impact UT-4** Implementation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in an overall increase in wastewater generation at the Project site; however, the proposed Project would not result in an exceedance of the Joint Water Pollution Control Plant's (JWPCP's) wastewater treatment capacity. Impacts would be *less than significant*. | No mitigation required | Less than significant |
| **Impact UT-5** The implementation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not result in the generation of solid waste during construction or operation that would exceed the existing capacity of existing landfills serving Redondo Beach. Therefore, impacts would be *less than significant*. | No mitigation required | Less than significant |
| **Impact UT-6** The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would not result in generation of solid waste that would conflict with Federal, State, and local statutes and regulations related to solid waste. Due to existing local programs implementing State laws for diversion, would be *no impact*. | No mitigation required | No impact |
| **CUMULATIVE IMPACTS** | | |
| The proposed Project would not substantially contribute to any cumulatively considerable impacts for any of the environmental issues areas evaluated within the EIR. | | |

As previously described the EIR evaluates six alternatives, including a No Project Alternative, in compliance with CEQA. These alternatives include:

- Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)
- Alternative 2 – Sale and Redevelopment of the BCHD Campus
- Alternative 3 – Revised Access and Circulation
- Alternative 4 – Phase 1 Preliminary Site Development Plan Only
- Alternative 5 – Relocate CHF Permanently and Reduced Parking Structure
- Alternative 6 – Reduced Height Alternative

Alternative 4 is the environmentally superior alternative because it would substantially reduce the severity of the construction-related noise impacts, which would be significant and unavoidable under the proposed Project. This alternative would reduce the total duration of construction-related noise to 29 months over one phase of development. Additionally, this alternative would similarly reduce the duration of construction-related criteria pollutant and GHG emissions. Finally, Alternative 4 would eliminate the net increase in trips associated with Phase 2 and would instead result in a substantial reduction relative to existing conditions. However, while this is the environmentally superior alternative, it is unclear if this alternative would be financially feasible given the required reduction in the height of the proposed RCFE Building required by MM VIS-1, without any replacement of the square footage (e.g., as described for Alternative 6). As such, Alternative 4 may not be able to meet the Project Objective 6 to *"[g]enerate sufficient revenue through mission-derived services and facilities to address growing future community health needs."*

## Table ES-2. Impact Comparison of Alternatives to the Proposed Project

| Issue Area | Project | Comparison to Project | | | | | |
|---|---|---|---|---|---|---|---|
| | | No Project | Alt 2 | Alt 3 | Alt 4 | Alt 5 | Alt 6 |
| Aesthetics and Visual Resources | Less than Significant with Mitigation | Less | Slightly Less | Slightly Less | Similar | Slightly Less | Less |
| Air Quality | Less Than Significant with Mitigation | Less | Similar | Less | Slightly Less | Similar | Slightly Greater |
| Biological Resources | Less Than Significant with Mitigation | Slightly Less | Similar | Slightly Less | Similar | Similar | Slightly Greater |
| Cultural Resources and Tribal Cultural Resources | Less Than Significant with Mitigation | Less | Similar | Slightly Less | Similar | Similar | Similar |
| Energy | Less Than Significant | Less | Similar | Less | Slightly Less | Similar | Similar |
| Geology and Soils | Less Than Significant with Mitigation | Less | Similar | Less | Similar | Similar | Similar |
| Greenhouse Gas Emissions and Climate Change | Less Than Significant | Less | Similar | Less | Slightly Less | Similar | Similar |
| Hazards and Hazardous Materials | Less Than Significant with Mitigation | Less | Similar | Slightly Less | Similar | Similar | Similar |
| Hydrology and Water Quality | Less Than Significant | Less | Similar | Slightly Less | Slightly Less | Similar | Similar |
| Land Use and Planning | Less Than Significant | Less | Less | Slightly Less | Slightly Less | Slightly Less | Slightly Less |
| Noise | Significant and Unavoidable | Less | Similar | Less | Slightly Less | Similar | Slightly Greater |
| Population and Housing | Less Than Significant | Slightly Greater | Similar | Slightly Less | Similar | Similar | Similar |
| Public Services | Less Than Significant with Mitigation | Less | Similar | Slightly Less | Similar | Similar | Similar |
| Transportation | Less Than Significant with Mitigation | Less | Slightly Less | Less | Less | Slightly Less | Slightly Less |
| Utilities and Service Systems | Less Than Significant | Less | Similar | Less | Slightly Less | Similar | Similar |
| **Meets Most of the Project Objectives?** | **Yes** | **No** | **Yes** | **No** | **Yes** | **Yes** | **Yes** |

# READER'S GUIDE

This section of the Environmental Impact Report (EIR) is provided to aid the reader in understanding the environmental issue areas that are addressed and where to find them. It is also intended to help the reader understand how the California Environmental Quality Act (CEQA) frames the discussion of each environmental issue area. The EIR takes its approach in defining the range of environmental issues analyzed from the CEQA Guidelines along with the input received from comments provided by agencies and interested members of the public during the 30-day public scoping process, which are provided in **Appendix A, *Initial Study, Notice of Preparation, and Scoping Comments***. The EIR addresses the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Master Plan) and its reasonably foreseeable direct, indirect, and cumulative environmental impacts, including construction-related impacts and long-term operational impacts after construction is completed.

The EIR addresses both phases of the proposed Master Plan. The Master Plan presents Phase 1 in the form of a preliminary site development plan. However, because Phase 2 would be developed approximately 5 years after the completion of Phase 1, there are uncertainties in the future health and wellness programming needs and financing. Therefore, the Master Plan presents a program of anticipated uses and design objectives for Phase 2. An illustrative range of potential designs for Phase 2 is depicted in the Master Plan in three example site plan scenarios which are also described in the EIR (see **Figures 2-11 through 2-13** and accompanying text in **Section 2.5.2, *Phase 2 Development Program***). The three scenarios are presented to enable the EIR to identify the potential environmental impacts of the Phase 2 development program, and to demonstrate the inherent trade-offs in decisions related to Phase 2 programming and design (see **Table 2-4** on **Page 2-54**). To address the potential impacts of the Phase 2 development program, the EIR analyzes operational impacts using conservative (i.e., worst-case) assumptions. For example, the daily vehicle trip generation analyzed for the Phase 2 development program is based on the maximum square footage described for each of the proposed uses (i.e., a Wellness Pavilion of up to 37,150 square feet [sf], an Aquatics Center of up to 31,300 sf, and a new Center for Health and Fitness (CHF) of up to 20,000 sf; see **Section 2.5.2.1, *Proposed Uses*** on **Page 2-46**). Similarly, the EIR analyzes potential construction-related impacts (e.g., ground disturbance) and aesthetics impacts (e.g., building height) using conservative assumptions related to maximum building footprints and maximum building heights. The ultimate site development plan developed for Phase 2 would fit within the maximum square footage and building envelope analyzed by the EIR.

Therefore, while the EIR analyzes the Phase 1 preliminary site development plan at the **project level**, the EIR analyses the Phase 2 development program at the **programmatic level**; that is, the assessment of potential environmental impacts associated with the Phase 2 development program addresses a range of possible development site plan scenarios that occur within the parameters of the proposed Master Plan. Although the EIR's analysis of Phase 1 is project-level and its analysis of Phase 2 is programmatic, the depth and level of detail of the analysis of impacts is the same for both phases. This approach – of addressing a long-range development plan, such as the proposed Master Plan, with a project-level design phase and a programmatic phase in a single, comprehensive EIR – is not unusual and meets the definition of a *"stable and finite project description."* The EIR's comprehensive approach to evaluating environmental effects of both phases of the Master Plan complies with CEQA's requirement to address *"the whole of the action"* that is presented to the decision-makers. At some time in the future, when BCHD has completed more detailed planning for the Phase 2 program and has developed a final site plan, the Phase 2 development will be subject to the CEQA process once again. The final site plan would be addressed in a separate CEQA document which could take the form of an Addendum to the EIR (CEQA Guidelines Section 15164[a]), or a Supplemental EIR (CEQA Guidelines Section 15162), depending on the nature of the Phase 2 site plan, its potential range of environmental impacts and future conditions.

The ~~Draft~~ EIR consists of seven major sections and supporting appendices with additional levels of technical detail and/or modeling results. **Section 1.0, *Introduction*** describes the purpose and scope of the EIR, the public review process, and the required approvals for the proposed Project. The introduction identifies the BCHD as the *"lead agency"* (i.e., the public agency that has the primary responsibility for carrying out or approving a project). Additionally, the City of Redondo Beach and City of Torrance are identified as *"responsible agencies."* (i.e., public agencies, other than the lead agency, which have responsibility for carrying out or approving a project.) **Section 1.8, *Areas of Known Public Controversy*** lists issues of concerns that have been raised by agencies and interested members of the public to date in the public scoping process. **Section 1.4, *Public Review and Comments*** ~~identifies~~ describes the several ~~available~~ methods through which ~~for~~ the public had opportunity to provide formal comment on the Draft EIR.

The main body of the EIR is comprised of three sections **Section 2.0, *Project Description,* Section 3.0, *Environmental Impact Analysis and Mitigation Measures*,** and **Section 5.0, *Alternatives*** as described further below:

**Section 2.0, *Project Description*** presents detailed information about the proposed Master Plan. It identifies the location of the Project site, existing and proposed uses, proposed design

elements, and other features of the proposed Project. It describes in detail the proposed Master Plan's two phases: the Phase 1 preliminary site development plan and the Phase 2 development program. The Project Description also identifies other components of the proposed Master Plan, including the Project Objectives and Design Guidelines. The Project Description as presented in the EIR is the basis for the EIR's environmental impact analysis and findings.

The largest section of the EIR is **Section 3.0, *Environmental Impact Analysis and Mitigation Measures***. This section discusses the potential for the proposed Project to result in environmental impacts related to a broad range of environmental issue areas – including aesthetics and visual resources, air quality, biological resources, cultural resources and tribal cultural resources, geology and soils, hazards and hazardous materials, noise and vibration, transportation, and several others – each of which is addressed in their own sub-section (e.g., **Section 3.1, *Aesthetics and Visual Resources***). The range of environmental issue areas discussed in this section is based on a preliminary analysis, prepared as the first stage in the CEQA process (i.e., **Initial Study**), and on input received from agencies and concerned members of the public to date in the public review process (see **Appendix A, *Initial Study, Notice of Preparation, and Scoping Comments***). Each sub-section is divided into four smaller sections that generally follow a uniform format:

1. **Environmental Setting** – Describes the current conditions related to the specific topic (e.g., ambient air quality, ambient noise levels, etc.) at the Project site and within the surrounding vicinity. The EIR identifies relevant environmental resources (e.g., **Section 3.3, *Biological Resources*** presents an inventory of plants and wildlife known to occupy the Project site at the time of the field surveys conducted in 2019), along with other conditions that define the environmental setting or *"baseline"* against which the potential environmental impacts of the proposed Project are evaluated (i.e., the number of daily vehicle trips generated by the current uses at the BCHD campus).
2. **Regulatory Setting** – Lists relevant policies, plans, and regulations (Federal, State, regional, and local) that may play a role in defining how impacts are determined to be significant, and/or reducing or avoiding impacts through regulation (e.g., Clean Water Act and Storm Water Pollution Prevention Plan requirements in **Section 3.9, *Hydrology and Water Quality***). The Regulatory Setting section often identifies government agencies with special expertise with respect to the environmental issue area in question (e.g., the South Coast Air Quality Management Agency as the expert agency relative to air quality issues and impacts in **Section 3.2, *Air Quality***).
3. **Impact Assessment and Methodology** – Identifies the Thresholds of Significance (see below) used to determine if the environmental impacts associated with the proposed

Project are "*significant"* or *"less than significant"* and describes the methodology used to identify and evaluate the level of the environmental impacts.

4. **Project Impacts and Mitigation Measures** – Analyzes the environmental impacts of the proposed Project related to the environmental issue area being addressed and determines if the impact is significant when judged against baseline conditions and the thresholds of significance. In cases where the EIR determines that the proposed Project would have a significant impact, it presents measures (i.e., *"mitigation measures"*) that, if feasible, would avoid or substantially reduce the impact to a level that is less than significant. For each environmental issue area, the EIR discloses the impacts of the proposed Project and the level of significance after mitigation (if mitigation measures are adopted and implemented by the decision-makers). It is this disclosure of impacts, and the effectiveness of mitigation measures, that constitutes the major findings of the EIR.

**Section 5.0, *Alternatives*** is central to the EIR's analysis and its role in addressing significant environmental impacts associated with the proposed Project. CEQA requires a discussion of a reasonable range of feasible alternatives to the proposed Project. The core of the Alternatives section is a comparison of the alternatives to the proposed Project in terms of whether they would reduce any impacts associated with the proposed Project and whether they would meet most of the basic Project Objectives. Although they serve the same function – which is to reduce impacts – alternatives are different from mitigation measures in that they fundamentally modify the proposed Project, while mitigation measures simply require adjustments to the design and/or the implementation of the proposed Project.

CEQA requires that the EIR base its determination of whether or not an impact is significant on clearly stated criteria (i.e., *"significance thresholds"*). The significance thresholds used in this EIR are based on Appendix G of the CEQA Guidelines, which provides a list of generic questions intended to guide lead agencies in determining what level of CEQA documentation is appropriate for a project. (These questions are used in the Initial Study presented in **Appendix A, *Initial Study, Notice of Preparation, and Scoping Comments***.) The EIR follows the common practice of using those questions as a framework for addressing environmental impacts, with modifications or additional criteria provided by specific pertinent policies and regulations adopted by relevant agencies. Examples of established policies and regulations that serve as criteria are the air pollutant standards established by the South Coast Air Quality Management District and the Redondo Beach Stormwater Management and Discharge Control Ordinance. Established criteria adopted by relevant authoritative agencies such as these are used to inform application of the questions provided in Appendix G of the CEQA Guidelines as significance thresholds. Each of the sub-sections in **Section 3.0, *Environmental Impact Analysis and***

***Mitigation Measures***, identifies the **Thresholds of Significance** used to assess impacts related to the specific environmental issue area under consideration. They are identified in the third sub-section within a major environmental issue area heading, often immediately following the **Regulatory Setting** sub-section. The Thresholds of Significance sub-section is followed immediately by the **Methodology** sub-section, which describes the sources of information used in the impact analysis, methods uses, and any specific criteria used to interpret or apply the significance threshold. The significance thresholds are used again when the EIR evaluates the effectiveness of any mitigation measures or alternatives designed to reduce or avoid potential impacts.

Impacts are measured against baseline environmental conditions, defined by CEQA as the environmental conditions existing before the proposed Project. (These baseline environmental conditions are generally defined as the conditions at the time of the issuance of the Notice of Preparation for the EIR.) For example, traffic counts were conducted at the intersections and along the roadways within the immediate vicinity of the Project site shortly after the release of the Notice of Preparation for the EIR, before the on-set of the COVID-19 pandemic in March 2020.

Many impacts can readily be addressed by standard conditions of approval and/or compliance with regulations already enforced by regulatory agencies and municipalities. This is especially true for potential impacts associated with hydrology and water quality, for example, and most of the potential impacts related to geologic hazards. The EIR's task in such cases is to evaluate the potential impact, then identify the relevant regulations and/or adopted development standards enforced by State and local agencies to avoid the impact, evaluate their effectiveness in mitigating the impact, and make a finding as to whether or not the impact would still be significant. The EIR also considers project design features or standard best management practices that can be relied on to have mitigating effects. Project design features that are explicitly identified as elements of the proposed Master Plan in the Project Description (e.g., Leadership in Energy and Environmental Design [LEED] Gold Certification and WELL Building Certification) and can be relied on in the EIR's impact assessment for their mitigating effect, become binding commitments for the proposed Project upon the certification of the Final EIR and approval of the proposed Project. In cases where environmental impacts are not reduced to a less than significant level, even after compliance with regulations and the mitigating effects of project design features are considered, the task of the EIR is then to identify feasible mitigation measure that can substantially reduce or avoid the environmental impact when adopted and implemented.

## SECTION 2.0, *PROJECT DESCRIPTION*

The EIR gives an overview of the proposed Project in the first two pages of the Project Description, followed by an in-depth description of the Master Plan in the sub-sections that follow. **Section 2.2, *Existing Project Site Characteristics*** describes the location and characteristics of the Project site, as they existed at the time when the Notice of Preparation for the EIR. The existing uses, buildings, infrastructure and programs of the campus are described in detail. It should also be noted that the Notice of Preparation was issued in June 2019, before the on-site of the ongoing COVID-19 pandemic. Therefore, while conditions may have temporarily changed (e.g., vehicle trip making patterns in response to State-issued public health guidelines and prolonged closure of public schools), the EIR considers a pre-pandemic condition. **Section 2.4, *Project Objectives*** presents the three Project Pillars and six Project Objectives that were used to guide the development of the Master Plan and the alternatives. Detailed elements and features of the Phase 1 preliminary site development plan are described in **Section 2.5.1, *Phase 1 Preliminary Site Development Plan***. The EIR describes the more general Phase 2 development program in **Section 2.5.2, *Phase 2 Development Program***. Construction activities are also described in detail for the Phase 1 preliminary site development plan and the Phase 2 development program (i.e., **Section 2.5.1.6**, ***Construction Activities*** and **Section 2.5.2.4, *Construction Activities***, respectively).

## SECTION 3.0, *ENVIRONMENTAL IMPACT ANALYSIS AND MITIGATION MEASURES*

**Section 3.0, *Environmental Analysis and Mitigation Measures*** comprises the main body of the EIR in which each of the major environmental issue areas are addressed in separate sections in the alphabetical order in which they are listed in Appendix G of the CEQA Guidelines and in the Initial Study. Each section or chapter follows the same general format, beginning with Environmental Setting, followed by Regulatory Setting, Thresholds for Determining Significance, Methodology, and Project Impacts and Mitigation Measures. Each section ends with a discussion of the potential for the proposed Project to result in Cumulative Impacts in combination with other projects causing related impacts.

The **Section 3.0.1, *Introduction*** provides information that is important to the reader's understanding of the impact classifications used in the EIR to characterize the level of a potential environmental impact.

The EIR impact discussions classify impact significance levels as:

1. **Significant and Unavoidable** – a significant impact to the environment that remains significant even after mitigation measures are applied;

2. **Less Than Significant with Mitigation** – a significant impact to the environment that can be avoided or reduced to a less than significant level with mitigation;
3. **Less Than Significant** – a potential impact that would not meet or exceed the identified thresholds of significance for the environmental topic area; and
4. **No Impact/Beneficial Impact** – no impact would occur for the environmental topic area or a beneficial effect would result.

The determinations of significance in the EIR are made based on the thresholds of significance and the applicable provisions of CEQA and the CEQA Guidelines for each environmental topic area (see **Page 3-2**).

The introductory section also lists the projects considered in the assessment of cumulative impacts in the EIR (see **Section 3.0.2, *Cumulative Impacts***).

### 3.1 Aesthetics and Visual Resources

CEQA requires the EIR to address impacts to aesthetics and visual resources in specific ways. Appendix G of the CEQA Guidelines calls for analysis: 1) of impacts to *"scenic vistas;"* 2) to *"scenic resources within a State Scenic Highway;"* 3) *"conflicts with applicable zoning and other regulations governing scenic quality"* (for projects in urbanized areas); and 4) *"impacts to public views resulting from light or glare."* **Section 3.1, *Aesthetics and Visual Resources*** provides an analysis of each of these potential impacts. This section also discusses shade and shadow effects and briefly considers other issues not required by CEQA (e.g., private views and line of sight). Because the discussion of aesthetics and visual resources can be highly subjective, standard CEQA practice commonly relies on the adopted policies and regulations of local municipalities as the criteria for determining what features in the public landscape are significant visual resources and what degree and type of effect should be considered a significant adverse impact. **Section 3.1.1**, ***Environmental Setting***, describes visual resources and visual character of the Project site and the surrounding vicinity. Not surprisingly, the visual environment of the neighborhoods and commercial area around the Project site is characteristic of a suburban environment. The campus, however, is distinct in that it presents a campus-like appearance in its arrangement of buildings related by a common institutional mission that is visually apparent to the casual observer from off-site. The existing buildings on the campus, by their scale and internal physical relationships, signal a land use that is fundamentally unlike its commercial and residential neighbors. The EIR provides representative views of the Project site as it appears today from six different viewpoints within the public realm. **Section 3.1.1, *Environmental Setting*** identifies sources of light and glare in the existing visual environment. It also depicts current conditions related to shade and shadow effects created by the existing buildings on the

campus. The shade and shadow study shows that BCHD buildings, especially the 5-story Beach Cities Health Center (514 North Prospect Avenue), along with the topography of the Project site, contribute to shadows that extend off-site into the residential neighborhood and Towers Elementary School to the northeast (see **Page 3.1-19**).

**Section 3.1.2**, ***Regulatory Setting***, identifies the Redondo Beach and Torrance General Plan policies and municipal code regulations related to visual resources. The Redondo Beach General Plan does not identify any designated scenic vistas or view corridors, and the Project site is not located within any of the scenic view corridors identified in the Torrance Community Resources Element. **Section 3.1.3**, ***Impact Assessment and Methodology*** presents the thresholds for determining the significance of environmental impacts to aesthetic and visual resources (from Appendix G of the CEQA Guidelines) and describes the methodologies for analyzing impacts.

- **Scenic Vistas** – The discussion of impacts to scenic vistas in CEQA is usually focused on scenic vistas that have been designated as significant visual resources by city policies or some other adopted public planning document. There are no designated scenic vistas, corridors or viewsheds in Redondo Beach or in the vicinity of the Project site. Nevertheless, the EIR identifies a nearby public viewpoint that it considers to be important because of its expansive view of the Palos Verdes hills from a well-travelled intersection at a high point within Redondo Beach (190th Street & Flagler Lane). Under existing conditions, the former hospital building on the campus rises to a height just below the ridgeline of the Palos Verdes hills. As shown in the simulated view of the proposed Project (Representative View 6; see **Page 3.1-35**) the proposed Residential Care for the Elderly (RCFE) Building would obstruct the view of the ridgeline, interrupting the view of the Palos Verdes hills from this public viewpoint. Although the view from the 190th Street & Flagler Lane intersection has no formal status as a designated scenic vista or scenic view corridor, the EIR identifies the obstruction of the ridgeline from this viewpoint as a significant environmental impact due to its scenic qualities. To address the impact, the EIR presents a mitigation measure, which requires that the proposed RCFE Building be modified to avoid obstruction of the ridgeline as seen from this public viewpoint. Mitigation Measure (MM) VIS-1 (see **Page 3.1-38**) identifies the reduction in the effective height of the proposed building that would be necessary to avoid the impact, but does not prescribe a precise method for implementing the mitigation. Possible methods would be to remove the uppermost stories of the building, recess the building foundation into the ground surface, or a combination of these two methods.
- **Degradation of Visual Character** – The EIR provides a detailed discussion of the changes in visual appearance, and in some cases to visual character, that would occur as a result of the proposed Project (beginning on **Page 3.1-39**). This discussion complements the previous description of the existing visual character of the site and surroundings in **Section 3.1.1, *Environmental Setting***. The EIR evaluates these changes in the visual environment to consider whether or not they constitute a *"degradation"* of visual

character. The assessment of impacts then goes on to apply the standard prescribed in Appendix G of the CEQA Guidelines, applicable to projects in an urbanized area: *"If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?"* The EIR reviews the proposed Project for potential conflicts with applicable policies and zoning regulations governing scenic quality (see **Table 3.1-2** and **Table 3.1-3**). The review finds no conflicts with these applicable policies and zoning regulations, leading to the finding that the changes to the visual character associated with the proposed Project would not constitute a significant environmental impact.

- **Light and Glare** – This analysis identifies potential sources of light and glare that would result from implementation of the proposed Master Plan. This discussion complements the overview of existing sources of lighting and glare in **Section 3.1.1, *Environment Setting***. New sources of lighting under the proposed Project would include vehicle headlights, outdoor lighting on buildings and on the campus grounds, and interior lighting in proposed buildings. The EIR considers the potential effects of these sources and determines that standards of the City of Redondo Beach in combination with design features of the Master Plan would effectively avoid adverse impacts such as light spillover to off-site land uses. Potential sources of glare include windows and reflective materials of building facades. The EIR explains that the Phase 1 site development plan and the Phase 2 development program would comply with Torrance Municipal Code Section 92.30.5 and further that the exterior of the proposed buildings shall be constructed using low- or no-glare materials, such as high-performance tinted non-reflective or non-mirrored glass and low reflective surfaces, with Light Reflective Values of less than 35 percent. Therefore, the analysis finds that potential changes in lighting and glare would not constitute significant impacts.
- **Shade and Shadow Effects** – Although not an environmental issue area included under Appendix G of the CEQA Guidelines, the contribution of the proposed Project to shade and shadow conditions is addressed through an analysis of shadows cast during the summer and winter solstices and the autumnal equinox. In the northern latitudes (i.e., away from the equator), shadows are shorter during summer and longer during winter. The EIR compares the extent of shadows cast at those times of year under existing conditions with shadows cast at the same times of the year under post-development conditions. Shadows are at their greatest extent at the winter solstice in late December. Under existing, pre-development conditions much of the adjacent Torrance neighborhood to the east is in shadow – particularly during the late afternoon hours (see **Figure 3.1-2** through **Figure 3.1-4**). The longest shadows cast during the winter solstice encroach into the residential neighborhood and extend as far as Towers Elementary School due to the combined effects of the natural topography, existing buildings, and trees on the campus, and self-shading effects of homes in the residential neighborhood. With the proposed implementation of the Phase 1 preliminary site development plan, the configuration of shadows at the winter solstice would change, shifting slightly north and diminishing in some portions of Towers Elementary School (because of the removal of existing buildings on the campus) and extending farther east on the northern portion of the Towers

Elementary School, as a result of the RCFE Building (see **Figure 3.1-5** through **Figure 3.1-7**). However, the shadows would generally only extend off-site during the late afternoon hours (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter). Therefore, due to the limited duration of shading the analysis has determined that this impact would be less than significant.

## 3.2 Air Quality

The Air Quality section is a relatively complex section of the EIR because it analyzes several different kinds of impacts. It also necessarily employs a specialized technical vocabulary that uses many acronyms and technical terms. Air emissions generated by construction and operation of the proposed Project are analyzed in various ways. Air quality impacts are addressed at the regional scale of the South Coast Air Basin. However, some impacts, particularly construction emissions, are assessed at the local scale to evaluate their potential to adversely impact nearby *"sensitive receptors."* The EIR not only identifies construction emissions at the local level, but models their dispersion and potential health effects in terms of cancer risk (see **Appendix B, *Human Health Risk Assessment and CalEEMod Air Quality Calculation Results***). The analytic methods, thresholds of significance and key parameters for CEQA analysis are clearly prescribed by the South Coast Air Quality Management District, which is the regional agency that regulates air quality of the South Coast Air Basin.

The key terms used in the impact analysis are explained in detail in the EIR. **Criteria air pollutants** refers to seven specific pollutants regulated to comply with Federal and State ambient air quality standards (see **Table 3.2-1**). **Localized Significance Thresholds** (LSTs) are thresholds prescribed by South Coast Air Quality Management District for evaluating potential impacts to sensitive receptors (from a given distance from construction activities) of construction emissions for a subset of criteria pollutants. **Toxic Air Contaminants** (TACs), are a different group of pollutants that are regulated because of their potential health effects at the local level. TACs have been known to cause chronic and acute adverse effects on human health (see **Page 3.2-6**). **Diesel Particulate Matter** (DPM) refers to particulate matter emissions from diesel engines (e.g., heavy construction equipment) commonly evaluated in a **Health Risk Assessment** (HRA). Key terms used in the Health Risk Assessment are **Point of Maximum Impact** (PMI) and **Maximum Exposed Individual Resident** (MEIR).

Current air quality conditions are described in **Section 3.2.1**, ***Environmental Setting***. The relevant Federal, State, regional, and local regulations are summarized in **Section 3.2.2, Section 3.2.2, *Regulatory Setting***. **Section 3.2.2.1, *Thresholds for Determining Significance*** identifies

the relevant regulatory thresholds that further build upon the questions provided in Appendix G of the CEQA Guidelines and **Section 3.2.3.2, *Methodology*** for analysis of the impacts discussed.

The EIR addresses the potential for the proposed Project to conflict with the South Coast Air Quality Management District's Air Quality Management Plan in Impact AQ-1 (beginning on **Page 3.2-24**). Additionally, the EIR addresses impacts related to criteria air pollutant emissions in Impact AQ-2 (beginning on **Page 3.2-35**). Impacts related to DPM emissions during construction and health hazards during construction are described under Impact AQ-4 (beginning on **Page 3.2-45**). With the implementation of an Air Quality Management Plan requiring soil stabilization measures and the use of U.S. Environmental Protection Agency Tier 4 engines impacts (MM AQ-1) would be below the thresholds established by the South Coast Air Quality Management District.

The EIR also addresses operational emissions (beginning on **Page 3.2-42**), the potential for carbon monoxide (CO) *"hotspots"* near local intersections (beginning on **Page 3.2-48**) and the potential for significant impacts related to odors (beginning **Page 3.2-50**). However, operational emissions of criteria pollutants (including CO) would not exceed the thresholds established by the South Coast Air Quality Management District and the potential for noticeable odors (e.g., associated with kitchens, etc.) would be minimal and similar to existing conditions. Therefore, these operational impacts would be less than significant.

### 3.3 Biological Resources

The ~~Draft~~ EIR addresses the potential of the proposed Project to impact biological resources. **Section 3.3.1, *Environmental Setting*** describes the biological resources in the vicinity and presents findings of two surveys conducted by a field biologist to identify resources on-site. **Section 3.3.2, *Regulatory Setting*** identifies Federal, State and local regulations and policies that govern biological resources. The thresholds for determining significant impacts to biological resources are presented in **Section 3.3.3, *Impact Assessment Methodology***. Because the campus is already developed, and the vacant Flagler Lot has no significant native vegetation, there is very little in the way of biological resources on the Project site. No riparian habitat, aquatic features or other sensitive natural community habitats occur on-site or in the immediate vicinity. The Project site is not a wildlife corridor or a significant habitat linkage for wildlife movement or provide significant nursery habitat. The many mature trees on the perimeter offer potential nesting and roosting habitat for native and non-native birds. The EIR therefore identifies a potential to impact nesting birds, either directly (i.e., from tree removal) or indirectly (i.e., disturbance from construction noise), should they be present during construction activities. This impact could be avoided through implementation of the standard mitigation measure that

requires a survey for nesting birds prior to construction activities, followed by impact avoidance measures (MM BIO-1; see **Page 3.3-19**). The Cooper's hawk (*Accipiter cooperii*) is the only special-status species that has more than a low potential to use the site as potential roosting, foraging and nesting habitat. But the removal of trees and subsequent introduction of native tree species as elements of the proposed landscape plan (see **Figure 2-7**) would not significantly impact the Cooper's hawk.

### 3.4 Cultural Resources and Tribal Cultural Resources

Cultural resources include historic structures and objects as well as archaeological (prehistoric or historic-period) resources. Tribal resources are objects, sites, landscapes or features that have cultural value to a California Native American tribe. The Public Resources Code and CEQA Guidelines provide clear definitions for these resources and their evaluation under CEQA. This section of the EIR presents the prehistoric and historic context for cultural resources known to occur in the vicinity of the campus. The discussion presents findings of an Historic Resources Assessment of the Beach Cities Health Center and the attached Maintenance Building, which found that these structures do not have historical significance, based on Federal, State and local criteria (see discussion beginning on **Page 3.4-7** as well as **Appendix D, *Cultural Resources Technical Studies***). The EIR identifies four historically significant properties in the vicinity of the Project site (see **Table 3.4-1**) and addresses the potential for the proposed Project to adversely impact these properties. The analysis finds that in each case, the physical features that contribute to the historical integrity of each of the four properties would not be affected by the proposed Project – particularly given that the two historically significant properties that have a view of the Project site were relocated to their current locations from other parts of Redondo Beach (see **Page 3.4-10**).

The EIR presents information on other cultural resources derived from archival records research, scholarly publications on local prehistory, history and archaeology, and in the case of tribal cultural resources, from direct formal consultation with Native American Tribe representatives. While there are no know archaeological or tribal cultural resources at the Project site, a high degree of presence and activity by Native Americans in the past in and around the South Bay (related to salt marshes, tribal villages and trade routes), indicates the possibility that resources may be present in the area. The fact that the campus has been previously graded and developed does not entirely rule out the possibility of buried resources being present, and potentially uncovered, during ground disturbance associated with the proposed redevelopment. The EIR identifies mitigation measures designed to avoid impacts to both cultural and tribal cultural resources in an integrated and comprehensive approach (MM CUL-1 and CUL-2; see **Page 3.4-**

**26**). Potential impacts to any significant resources encountered during construction (including human remains) would be avoided and/or fully mitigated with the implementation of these measures (see **Page 3.4-27**).

## 3.5 Energy

Potential impacts related to energy fall into two categories: 1) impacts resulting from wasteful, inefficient, or unnecessary consumption of energy during construction or operation of the proposed Project; and 2) conflict or obstruction with a State or local plan for renewable energy or energy efficiency. **Section 3.5**, ***Energy*** evaluates the potential for the proposed Project to result in either of these two impacts. Energy consumption occurs due to use of electrical energy, natural gas, and fuel for transportation. **Section 3.5.1, *Environmental Setting*** describes how electrical power and natural gas are provided to the South Bay Region and the Project site, and estimates current energy consumption of the campus for electricity, natural gas, and transportation fuel. **Section 3.5.2, *Regulatory Setting*** presents policies and regulations related to energy consumption and the thresholds for determining significant impacts related to energy are presented in **Section 3.5.3, *Impact Assessment Methodology***. The discussion of environmental impacts provided in **Section 3.5.4, *Project Impacts and Mitigation Measures*** addresses energy consumption during construction and in the post-construction operational stage after development of the proposed Project. As required by CEQA, the impact assessment focuses on whether or not the consumption of energy during construction is wasteful, inefficient or unnecessary, and evaluates the compliance of the proposed Project with energy reduction measures. The EIR also projects the amount of electrical energy, natural gas that would be consumed by the proposed Project during its operation after construction (see **Tables 3.5-8** and **3.5-9**, respectively). The impact assessment again focuses on project design features (e.g., photovoltaic solar panels, solar hot water systems, energy efficient heating, ventilation and air conditioning systems, high performance insulation and energy efficient lighting and plumbing systems). The proposed Project would result in an increase in energy use at the site after completion, but the increase is relatively small (0.5 percent of electricity and 0.2 percent of natural gas consumption in Redondo Beach) and would not adversely impact regional or local energy supplies and capacities. As a redevelopment project in an already established urbanized environment (e.g., in contrast to a greenfield development), the net increase in daily vehicle trips generated by the uses included in the Phase 2 development program would not represent a wasteful, inefficient or unnecessary use of fuel. A review of the energy-reducing project design features (e.g., LEED Gold Certification and WELL Building Certification) has led the EIR to conclude that the proposed Project would not conflict with or obstruct State or local plans for renewable energy or energy efficiency.

## 3.6 Geology and Soils

CEQA requires analysis of the potential for the proposed Project to result in significant hazards related to geologic or soil conditions, or to impact geologic resources such as unique paleontological resources or unique geologic features. Most hazards related to geology and soils are linked to seismic conditions and the potential for significant seismic events to bring about catastrophic damage ranging from structural damage to buildings and infrastructure, or human death or injury. The EIR describes seismic conditions in regional and local terms, along with the probability of seismically induced impacts to occur at the Project site under current conditions, and the potential of the proposed Project to introduce or increase hazards during or after construction. Soil hazards include several potentially seismically induced effects (e.g., liquefaction, subsidence, lateral spreading) and soil expansion. Other hazards addressed in this section include the potential for the proposed Project to subject persons or property to tsunami impacts.

In some cases (e.g., with regard to liquefaction, landslide, slope instability, differential settlement, expansion, tsunami) the proposed Project presents no risk or a very low risk of impact because conditions for occurrence of the impact are not present at the Project site. Catastrophic failure resulting from significant seismic events is a regional hazard that potentially affects all structures. For new structures this hazard is addressed through strict compliance with current seismic standards of the California Building Code. The EIR identifies the significant public safety hazard presented by the existing condition of the former South Bay Hospital Building (currently operated as the Beach Cities Health Center), which was constructed over 60 years ago in compliance with the now-obsolete seismic standards in effect at that time. The assessment finds that the proposed Project would result in a significant beneficial impact through the action of removing the hazardous building and replacing it with structures built in compliance with today's seismic standards. MM GEO-1 (see **Page 3.6-25**) would require the proposed Project to comply with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the proposed Project.

This section also evaluates the potential of the proposed Project to impact unique paleontological resources (i.e., fossil remains in the underlying geology that have scientific value). The EIR finds that the probability of encountering significant resources is low, based on the geologic units that underlie the site and their history of yielding few significant fossils in the area. The implementation of MM GEO-2a and MM GEO-2b would require a construction worker awareness training and an established protocol for addressing any inadvertently discovered paleontological resources (see **Page 3.6-30**).

Key sources used to identify conditions at the site include the Geotechnical Study of the site prepared by Converse Consultants (2019), a Seismic Assessment of the Beach Cities Health Center Building (Nabih Youssef and Associates Structural Engineers 2018), and the Redondo Beach General Plan Environmental Hazards / Natural Hazards Element. Standard and regulated methods for addressing geotechnical and soil hazards are derived from multiple sources, including the California Building Code and the Redondo Beach Municipal Code. The evaluation of paleontological resources and potential impacts draws on the archival body of paleontological research in the region and standard methodologies of the Society of Vertebrate Paleontology.

### 3.7 Greenhouse Gas Emissions and Climate Change

The proposed Project would generate Greenhouse Gas Emissions (GHG) during construction and in its operations after development. CEQA requires analysis of GHG emissions and a determination of whether or not they result in a significant effect. The EIR discloses the proposed GHG emissions associated with the proposed Project in accordance~~s~~ with the methodology employed by the South Coast Air Quality Management District. Construction GHG emissions are presented in **Table 3.7-4** and operational emissions are presented in **Table 3.7-5**. However, following the qualitative thresholds defined by the CEQA Guidelines, the EIR bases its determination on the consistency of the proposed Project with State, regional and local plans, policies and regulations adopted to reduce GHG emissions. Methods of analysis used, and their basis in CEQA Guidelines and applicable plans and policies, are described in **Section 3.7.3, *Impact Assessment and Methodology***. Analysis of the consistency of the proposed Project with GHG reduction plans, policies and regulations is performed in **Table 3.7-8** and **Table 3.7-9**, and includes policies of the Redondo Beach and Torrance General Plans, the Climate Action Plans of both cities, and applicable regional GHG emissions reduction strategies (see **Table 3.7-10** and related discussion).

### 3.8 Hazards and Hazardous Materials

Hazardous materials are present on-site and would be present in relatively small amounts during operation after Project completion. The EIR discusses the following hazards that were identified as a part of the Phase I and Phase II Environmental Site Assessments prepared by Converse Consultants in 2019 and 2020, respectively:

- Asbestos-containing materials, lead-based paint, polychlorinated biphenyls, and mold in old buildings proposed for demolition;
- Previously abandoned and plugged oil well on the vacant Flagler Lot;
- Soils contaminated with tetrachloroethylene (PCE) from a neighboring use (i.e., former dry cleaner); and

- Hazardous materials routinely used in proposed uses and activities on-site (e.g., cleaning fluids, paints, etc.).

The EIR addresses the potential for the proposed Project to result in significant impacts resulting from the use, transport, disposal or presence of hazardous materials. Exposure to hazardous materials is a concern both during and after construction and to persons on- and off-site. This section addresses five categories of hazards related to the routine use of hazardous materials, as well as the potential accidental release of hazardous materials.

The handling, storage, use and transportation of hazardous materials is highly regulated by Federal, State, regional, and local agencies. Consequently, the EIR cites the regulations and oversight role of these several agencies in **Section 3.8.2**, ***Regulatory Setting***. The EIR presents extensive mitigation measures, all linked to the regulatory oversight and approval of the oversight agencies. With the implementation of these mitigation measures the EIR determined that impacts associated with hazards and hazardous materials would be less than significant.

### 3.9 Hydrology and Water Quality

**Section 3.9, *Hydrology and Water Quality*** addresses the potential for the proposed Project to cause significant adverse impacts related to both surface water and groundwater. The two topics are related and the potential for impacts is largely a function of how storm runoff is managed by the site development plan and on-site drainage systems associated with the proposed Project. Water quality and hydrology impacts can also occur during construction activities, in addition to the long-term effects of post-development operations and activities that might involve materials or chemicals that are potential contaminants if they enter the municipal storm drain system. The effects of construction activities and land uses on hydrology, and particularly on water quality, are highly regulated through Federal, State, regional, and local regulations that implement the Federal Clean Water Act. Consequently, the analysis of potential impacts and identification of feasible methods for their avoidance refer to adopted regulations that already exist as standard requirements and conditions of approval enforced at the municipal level. For that reason, **Section 3.9.2, *Regulatory Setting*** presents considerable background on the regulatory environment that provides the framework for impact avoidance relative to hydrology and water quality. It is preceded by **Section 3.9.1, *Environmental Setting*** which describes conditions of the hydrology and water quality in the subregion, ~~the~~ at the Project site~~,~~ and in the surrounding vicinity including conditions related to groundwater.

**Section 3.9.3, *Impact Assessment and Methodology,*** is followed by the discussion of impacts, which cites the many applicable regulations that both provide criteria for defining a significant

impact and the compliance mechanisms for avoiding impacts. The significance thresholds related to water quality focus on the potential for impacts related to erosion and the potential to conflict or obstruct the locally enforced water quality control plan or groundwater management plan. Significance thresholds related to hydrology address hazards such as flooding and tsunami, or changes in the amount or rate of runoff that exceed the capacity of the stormwater drainage system.

The EIR identifies the hydrology and water quality benefits of redevelopment of the campus through the substantial increase in pervious surfaces on-site (through the creation of 114,830 square feet of open space) and the construction of an infiltration system designed to retain, treat and infiltrate the 85$^{th}$ percentile storm, which can be expected to result in 0.30 to 1.50 inches of rainfall in a 24-hour period, into the groundwater. (The 85$^{th}$ percentile 24-hour storm event is used to represent the approximate amount of rainfall that would occur from 85 percent of storms occurring in the Los Angeles RWQCB region.) The EIR explains, in language that necessarily uses acronyms of regulatory agencies and their requirements, that avoidance of impacts to hydrology and water quality is achieved through compliance with established standards, regulations, procedures and best management practices.

### 3.10 Land Use and Planning

CEQA calls for analysis of the proposed Project's potential to conflict with any *"land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect"* and if so, whether such conflict would cause a significant environmental impact. This section of the EIR reviews the potential for the proposed Project to conflict with a broad range of adopted land use plans, policies and regulations, most of which were adopted by the City of Redondo Beach, but the analysis also addresses policies of the City of Torrance that may be applicable to the portion of the proposed Project in the City of Torrance right-of-way. For the determination of whether or not the proposed Project conflicts with a given plan, policy or regulation, the EIR provides a detailed analysis of proposed Project features and components and their relationship to the intent of adopted plans, policies and regulations. Some adopted plans and policies, particularly those adopted at the State and regional levels, and many goals and policies of the General Plans, are directed at governing bodies (i.e., the cities themselves) for their implementation and may not be intended for implementation directly by individual projects. In cases where a potential conflict may arise, the EIR addresses the question of whether or not that conflict would *"cause a significant environmental effect"* based largely on the analysis of effects provided in other sections of the EIR (e.g., aesthetics and visual resources, air quality, biological resources, noise, etc.).

The scope of this analysis is focused on *"land use"* plans, policies and regulations. Several plans, policies and regulations that are not related primarily to land use but are relevant to other environmental topics are discussed in other EIR sections.

**Section 3.10.1, *Environmental Setting*** provides an overview of land use throughout Redondo Beach and Torrance, with a more detailed discussion of land use in the vicinity of the Project site (see **Page 3.10-4**) and on the Project site (see **Page 3.10-5**). **Section 3.10.2, *Regulatory Setting*** describes the relevant policies and regulations at the state, regional and municipal levels that govern land use. Significance thresholds and methods of analysis are described in **Section 3.10.3, *Impact Assessment and Methodology*** (beginning on **Pages 3.10-15**). The impact analysis begins on **Page 3.10-16** in **Section 3.10.4, *Project Impacts and Mitigation Measures*** and is presented with the aid of several tables that address policies from several different sources (e.g., General Plans and zoning regulations). The EIR finds that the proposed Project does not conflict with any adopted plans, policies and regulations adopted for the purpose of avoiding an environmental effect. The City of Torrance has indicated their view that the proposed Project may be inconsistent with Torrance Municipal Section 92.30.8 which prohibits access *"to a local street from a commercially or industrially zoned through lot which also has frontage on a major or secondary street;"* however, this provision applies only to *"land uses within the City [of Torrance]"* (Torrance Municipal Code Section 93.30.1) and the EIR finds that any inconsistency with respect to that provision would not result to a significant environmental effect (e.g., air quality, noise, transportation, etc.).

### 3.11 Noise

The EIR analyzes the potential for the proposed Project to cause impacts related to either noise or ground-borne vibration. The analysis begins with a discussion of the current noise environment, current noise sources and the level of ambient noise around the Project site. The EIR explains that various metrics are used to evaluate different types of community noise (see **Section 3.11.1, *Environmental Setting***). Ambient noise levels are commonly measured using a 24-hour average. The predominant source of ambient noise is roadway noise from vehicles. **Table 3.11-4** presents peak hour noise levels on the streets near the Project site. The text also identifies the level and frequency of noise generated by medical response vehicles visiting the site (see **Page 3.11-7**), along with other sources of noise such as noises from parking garages and on-site equipment. The EIR also identifies *"sensitive receptors,"* defined as uses that are especially noise-sensitive, primarily schools and residences. **Section 3.11.3, *Regulatory Setting*** presents various Federal, State, and municipal regulations and policies related to community noise. Both the City of Redondo Beach and the City of Torrance establish permissible noise

levels for specific land use types. However, neither city has noise level standards for construction noise, but both jurisdictions limit the hours of construction.

**Section 3.11.4, *Impact Assessment and Methodology*** identifies the thresholds of significance used for determining noise and vibration, and the discussion that follows reviews the applicable numerical standards for evaluating impacts compared to those thresholds. The EIR identifies two different methods for measuring vibration, one for its potential effects on persons and activities, the other to measure the potential for structural damage. The EIR describes the methods used to calculate levels of construction noise that can be expected from the proposed Project, based on the number and types of equipment that would be active on-site and the duration of their activity. For construction noise and vibration, the EIR applies standards established by the Federal Transit Administration (FTA).

Project impacts are identified in **Section 3.11.5**, ***Project Impacts and Mitigation Measures***. Estimated construction noise levels at sensitive receptors are given in **Table 3.11-16** for Phase 1 and in **Table 3.11-17** for Phase 2. The analysis finds that construction noise levels during Phase 1 would significantly impact residences in the Torrance neighborhood to the east across Flagler Lane and Flagler Alley as well as the residences in Redondo Beach to the north across North Prospect Avenue and to the west across North Prospect Avenue. Phase 2 construction noise would also significantly impact residences in the Torrance neighborhood to the east of the campus and the on-site sensitive receptors within the RCFE Building constructed during Phase 1. The level of noise would exceed the FTA noise standards for the duration of the construction phases. Conventional methods of mitigating construction noise impacts – placement of noise barriers on-site to block the *"line of sight"* between the noise source and receptors – can reduce noise emanating from sources at or near the ground level. However, noise barriers are generally infeasible above a height of 30 feet, and therefore, noise barriers would not mitigate construction-related noise on the uppermost stories of the proposed buildings during Phase 1 and Phase 2 construction activities. The EIR discusses the limits of feasibility and concludes that the level of construction noise would result in a significant impact, even with implementation of all feasible measures (MM NOI-1 on **Page 3.11-37**).

The EIR addresses noise on off-site roadways generated by haul trucks and other construction traffic and presents peak hour construction traffic noise levels at sensitive receptors in **Table 3.11-21**. The increase in noise generated by construction trips is 1 A-weighted decibels (dBA) or less, which is below the level of a perceptible change in noise level (3 dBA), and so the EIR determines that construction-related vehicle trips, including haul truck trips, would not result in a significant impact.

Under Impact NOI-2 (see **Page 3.11-39**), the EIR calculates the level of ground-borne vibration that would be generated by construction vehicles operating during each construction phase. For each phase, the greatest vibration levels occur during site preparation activities. However, vibration levels from construction equipment would not exceed criteria established by the FTA and impacts would be less than significant both Phases 1 and 2. According to the FTA, haul truck trips associated with the proposed Project would have no impact because the number of events would not increase significantly (i.e., approximate doubling of events) and the vibration associated with the proposed Project does not exceed the existing vibration by 3 dBA or more.

The EIR evaluates noise generated by activities that would occur on-site after the completion of the proposed Project. These include outdoor activities (e.g., outdoor fitness classes, movie nights, farmers' markets, etc.), delivery and service trucks, trash pickup, parking lot and parking structure noises, and the sirens of emergency medical vehicles visiting the site. The impact assessment finds there is a potential for noise from on-site activities to generate significant impacts – particularly outdoor activities using a sound amplification system – but finds that these impacts can be avoided through feasible measures to limit the amplitude, duration, and timing of noise-generating activities. The EIR identifies a mitigation measure that calls for an Events Management Plan, which would establish operational procedures to limit noise levels to avoid exceeding municipal standards and require that activities on-site fully comply with the applicable municipal noise regulations (see MM NOI-3b and NOI-3c on **Page 3.11-48**). A separate measure limits the hours of deliveries by heavy-duty trucks and the amount of time truck engines are allowed to idle during deliveries (see MM NOI-3a on **Page 3.11-48**). The assessment identifies an increase in medical emergency vehicles to the site (due to the increase in assisted living care residents). Following the completion of the proposed development under the Phase 1 preliminary site development plan, it is anticipated that the campus would generate an estimated 244 ambulance calls per year (see **Page 3.11-43**); however, the increased number of emergency trips would be minimal and would not significantly increase ambient noise levels in the community.

### 3.12 Population and Housing

In compliance with CEQA Guidelines, the EIR addresses the question of whether the proposed Project would *"induce substantial unplanned population growth, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)."* The EIR also considers whether the proposed Project would *"displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere)."* In addressing the first question the EIR draws on U.S. Census data as well as data and housing policies of the respective Redondo Beach and Torrance General Plans. The

analysis also draws from the Southern California Association of Government's (SCAG's) regional planning data related to current and projected population and jobs and housing demands and supply in the South Bay. Following an overview of current and projected population, jobs and housing numbers in Redondo Beach, Torrance, and Los Angeles County (see **Section 3.12.1, *Environmental Setting***), the analysis presents the projected number of new employees that would be supported by the proposed Project, along with the increased housing demand of those new employees. The analysis specifically addresses the new housing demand in terms of the probable salary range (and therefore the range of affordable housing) of new employees (see **Section 3.12.4, *Project Impacts and Mitigation Measures***). This is followed by an analysis of the availability of housing within the affordable range in Redondo Beach or within a reasonable commute distance from the campus, which is based on today's trends in local job-commuter behavior. The analysis finds that the local housing supply is more than sufficient to meet the project's increase in housing demand. This is true even when other anticipated projects (i.e., cumulative projects) in the vicinity are considered.

The EIR discusses the increase in the local population that would result from the new assisted living units. The new Assisted Living units would increase the resident population by up to 177 new residents on-site. The number of new residents on-site would increase the population of Redondo Beach by 0.3 percent, a negligible increase that is well within the projected population growth assumed by SCAG, which in turn is based on the Redondo Beach General Plan. Future residents of the Assisted Living units would not increase the demand for local jobs, as they would not belong to the work-force population.

The analysis finds that the proposed Project would not "*induce substantial unplanned population growth*," through its proposal to provide housing for 177 residents or through its creation of approximately 170 new jobs at the campus. The population growth resulting from the proposed Project is neither *"substantial"* in its magnitude, nor *"unplanned,"* because it conforms to the General Plan and SCAG population growth projections for the City of Redondo Beach and the SCAG region.

The EIR also addresses the relocation of the current residents of the 60 Memory Care units on-site to new facilities in the new RCFE Building proposed to be completed in Phase 1. The phasing plan provides that current residents remain in place until the new units are ready to be occupied. The proposed Project would not *"displace substantial numbers of people or existing housing, necessitating the construction of replacement housing."*

## 3.13 Public Services

The EIR addresses the question of whether the proposed Project would increase demands for public services and as a consequence lead to substantial adverse physical impacts due to the need to build new facilities or alter the existing facilities of service providers. The analysis examines the demand of the proposed Project on fire protection services and emergency medical services as well as police protection services. (The Initial Study determined the proposed Project would have no impacts on schools, parks and other public services; these issues are briefly discussed in **Section 4.0, *Other CEQA Considerations***). **Section 3.13.1, *Environmental Setting – Fire Protection*** discusses current demands on fire protection services in both Redondo Beach and Torrance, the facilities and personnel of the fire departments of both cities, and the average response times relative to targeted performance standards. The Redondo Beach Fire Department, which is the first responder to the Project site, achieves average response times for both fire protection and emergency medical services that meet industry standards. The EIR estimates the increased demand generated by the new uses associated with the proposed Project, focusing on the increase in emergency medical services from the proposed 177 new assisted living residents. Based on the number of annual calls generated by current residents of the Silverado Beach Cities Memory Care Community on-site, the increased demand generated by new residents of Phase 1 would be approximately 244 new calls per year for emergency medical services. This represents an annual increase of 3 percent in the total responses by the Redondo Fire Department. Based on the assumption that new calls would be responded to from Fire Station No. 1 or 2 in Redondo Beach, 1.2 mile and 1.1 mile, respectively, from the Project site, the EIR concludes that the proposed Project would not trigger the need for new fire protection facilities, or alteration of fire protection facilities that might in turn result in substantial adverse physical impacts.

**Section 3.13.5, *Environmental Setting – Police Protection*** describes the resources and service levels of the Redondo Beach Police Department, as well as the Torrance Police Department. The EIR evaluates the potential increase in demands for police services based on the increased population of residents, employees and visitors to the Project site as a result of the proposed Project. According to the Redondo Beach Police Department, there are no plans to expand facilities or build new facilities. Based on this evidence, the EIR concludes the proposed Project would not result in an impact relative to the CEQA-based threshold of resulting in *"substantial adverse physical impacts associated with the provision of new or altered government facilities."*

## 3.14 Transportation

The EIR's discussion of impacts related to transportation addresses the relationship of the proposed Project to multiple modes of transportation – vehicular, transit, bicycle and pedestrian.

Its assessment includes Project-induced trips from both construction and operations. It also describes, at a detailed technical level, the policy basis for and methods of analyzing potential impacts related to vehicle miles traveled (VMT), the newly mandated criterion for gauging impacts related to transportation. In accordance with Appendix G of the CEQA Guidelines, the EIR discusses the potential of the proposed Project to increase hazards that might impact the circulation system, along with the potential of the proposed Project to result in inadequate emergency access. The impacts assessment also evaluates the potential of the proposed Project to result in significant environmental impacts due to a conflict with relevant transportation plans, policies and regulations.

**Section 3.14.1**, ***Environmental Setting***, identifies the existing conditions of all aspects of the circulation system. It describes the streets in the vicinity of the Project site sand their configurations, with special attention to local street access to the campus. It describes public transit service in the area, and it describes bicycle and pedestrian facilities. This section also describes the history and frequency of vehicular collisions in the vicinity as well as the phenomenon of cut-through traffic in the nearby residential neighborhood east of the campus in Torrance. The EIR presents recent data on collisions and cut-through traffic (beginning on **Page 3.14-18**).

The concept of VMT (i.e., the number of vehicle trips, multiplied by the length of each trip) is first introduced on the first page of the transportation section on **Page 3.14-1**. This section presents current data on VMT State-wide, at the County level, and in Redondo Beach. Additional background information related to the policy and legislative actions establishing VMT as the metric for traffic impact assessment in CEQA is provided in **Section 3.14.2, *Regulatory Setting*** (beginning on **Page 3.14-23**). This section also presents various regional regulations and local General Plan policies that have bearing on transportation planning.

**Section 3.14.3**, ***Thresholds of Significance and Methodology*** presents the thresholds and identifies the methodology for the analysis of transportation impacts. As with other environmental topics, the thresholds of significance are based on the Appendix G of the CEQA Guidelines. The EIR explains that it relies on the guidance provided by California Governor's Office of Planning and Research (OPR) Technical Advisory as a source for the appropriate methods, screening criteria and metrics for determining traffic impacts. The EIR implements OPR's methods in a manner that is consistent with VMT procedures currently being considered for adoption by the City of Redondo Beach (beginning on **Pages 3.14-37**). The EIR describes in detail the extensive site-specific and Project-specific research and analysis conducted as part of the technical traffic study (Fehr & Peers 2021a) to estimate the number of daily trips and the

length of trips generated by existing uses and the uses proposed by Phases 1 and 2 of the Master Plan. The total number of trips generated by the proposed Project, compared to existing trips generated by the Project site, is presented in **Table 3.14-7** on **Page 3.14-43**. The analysis shows that Phase 1 of the proposed Project reduces the number of daily vehicle trips from the existing number of trips generated by the campus, largely due to the substantially lower trip generation rate of the proposed Assisted Living units compared to the higher trip generation rate of the existing medical office use. With the addition of Phase 2, however, the proposed Project increases the number of daily vehicle trips over existing conditions by 376 trips, while reducing the AM Peak Period trips by 37 and the PM Peak Period trips by 28 trips.

In **Section 3.14.4**, ***Project Impacts and Mitigation Measures***, the EIR analyzes four categories of impacts, reflecting the four impact categories identified in the CEQA Guidelines (Appendix G).

The EIR reviews the proposed Project for consistency with applicable regional plans and refers to the analysis in **Section 3.10, *Land Use and Planning*** which addresses the consistency of the proposed Project with other relevant plans, policies and regulations adopted at the local level, including goals, policies and programs related to transportation management, alternative transportation and walkable communities. The EIR finds there are no significant impacts resulting from conflicts with plans, policies or regulations related to transportation.

The discussion of VMT analysis and methodology identifies two distinct metrics for evaluating VMT impacts. One is **Home-Based Work VMT per Employee** and the other is **Home-Based VMT per Capita** (see **Page 3.14-56**). Both metrics apply to the proposed Project because it would generate trips by employees on campus and trips generated by residents of the proposed RCFE Building. The analysis applies vehicle trip generation rates and trip length estimates derived through site-specific and use-specific research and compares the Home-Based Work VMT per employee and Home-Based VMT per capita to the applicable thresholds. In both cases, the Project VMT is below the thresholds. Based on these results, the EIR determines that the proposed Project would not result in significant traffic impacts related to VMT.

This impact category addresses construction-related traffic, such as truck trips (beginning on **Page 3.14.61**); cut-through traffic in the nearby Torrance neighborhood (beginning on **Page 3.14-62**); access to the Project site (beginning on **Pages 3.14-64**); and internal campus circulation (beginning on **Page 3.14-67**). The EIR finds that there would be no increase in hazards due to cut-through traffic because the proposed access on Flagler Lane (exits and entries) would be controlled to prohibit turning movements into the Torrance neighborhood (see discussion beginning on **Pages 3.14-62**). The EIR identifies an extensive mitigation measure that

requires specific actions to address construction-related traffic in a Construction Traffic and Access Management Plan to be reviewed and approved by the County Department of Transportation and Redondo Beach Community Development Department (MM T-2 on **Page 3.14-65**). The EIR also identifies the need to relocate the existing bus stop located on the south side of Beryl Street between the proposed driveway entrance on Beryl Street and the intersection with Flagler Lane, in order to avoid potential safety hazards related to vehicle-bus conflicts at this location. This requirement is identified in a separate mitigation measure, MM T-3 on **Page 3.14-67**. The EIR determines that with implementation of these two mitigation measures, MM T-2 and MM T-3, the impacts of the proposed Project related to hazards would be reduced to a level that is less than significant.

Provisions for emergency access during construction are identified in mitigation measure MM T-2, which requires an alternative entrance and secondary access to the campus during construction and procedures for coordination with local emergency service providers. The Construction Traffic and Access Management Plan prescribed in mitigation measure MM T-2 is required to address construction traffic routing and control, vehicle, bicycle and pedestrian safety, street closures and construction parking in a coordinated manner, to ensure that emergency access is not inhibited. Following construction, the campus would be accessible to emergency vehicles by its multiple access points, drop-off zone and internal circulation system (see **Page 3.14-69**).

### 3.15 Utilities and Service Systems

Development projects can cause environmental impacts directly or indirectly if they include or necessitate the construction of new utility or service facilities, or the expansion or relocation of facilities. New, relocated or expanded facilities are not in and of themselves an impact, but they may cause physical changes that in turn have significant environmental effects. This category of impact is more common with *"greenfield"* projects that have no existing utility connections prior to development. In addition to this category of impact, CEQA calls for an analysis of the availability of water supply to serve the project, along with other reasonably foreseeable developments, not only during normal years, but through multiple dry years. The effect of the proposed Project on the wastewater treatment system, along with other existing and projected demands on the wastewater system, is another potential source of impact identified by CEQA. And finally, CEQA calls for an analysis of the potential for the proposed Project to generate solid waste that exceeds State or local standards, exceeds the capacity of local infrastructure (e.g., landfills), impairs the attainment of solid waste reduction goals or fails to comply with Federal, State and local management and reduction statues and regulations related to solid waste.

The EIR describes the utility systems and facilities that currently serve the site. In separate subsections, it identifies the potential of the proposed Master Plan to result in adverse impacts related to its service demands on the regional and local water, wastewater and solid waste systems.

**Section 3.15.1, *Water Supply and Infrastructure*** describes in detail the water supply system, sources of local water supply, water use trends and projected regional and local water demand. The EIR identifies current water use at the campus (see **Table 3.15-4**) and identifies a projected increase in water consumption as a result of the proposed Project (see **Table 3.15-8** and Table **3.15-9**). Through its analysis of the existing and future supply and the assurance through a "*Will Serve"* letter from the local water provider (Cal Water) that the operational water needs associated with the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – can be met, the EIR makes the finding that the proposed Project would not have a significant impact on water supply.

**Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*** describes the local wastewater treatment system, including the capacity of the sewer main that presently serves the campus. **Table 3.15-10** presents the estimated volume of wastewater generated by current uses at the campus. The EIR's methodology for assessing the potential for impacts related to wastewater is described on **Page 3.15-27**. The projected wastewater generated by Phases 1 and 2 of the proposed Project are presented in **Table 3.15-11** and **Table 3.15-12**, showing a net increase in wastewater over existing conditions. However increase in volume would not exceed the design criteria established by the City of Redondo Beach for the local sewer mains. Nor would the increased volume exceed the capacity of the wastewater treatment facilities of the Joint Water Pollution Control Plant that serves the South Bay cities (see **Page 3.15-32**).

**Section 3.15.3, *Solid Waste Management Services*** describes the solid waste management system in Redondo Beach and the capacity of landfills in the region that might serve the solid waste disposal needs for the proposed Project. The amount of solid waste currently generated by uses at the campus is identified in **Table 3.15-15**. The EIR's methodology for evaluating the potential for impacts related to solid waste is described on **Page 3.15-40**. The projected volume of solid waste that would be generated by the proposed uses is provided in **Table 3.15-16**. The EIR determines that sufficient capacity exists in landfills serving the region to accommodate the volume generated by the Project. Compliance with State standards for solid waste management is assured through compliance with policies and standards established by the Redondo Beach General Plan Solid Waste Management and Recycling Element (beginning on **Page 3.15-43**). Construction waste generated during construction of Phases 1 and 2 would be subject to the City

of Redondo Beach Construction and Demolition Ordinance, which would bring the management of solid waste from construction into compliance with local standards.

**SECTION 4.0, *OTHER CEQA CONSIDERATIONS***

This section addresses five topics required by CEQA.

- Significant Unavoidable Environmental Effects
- Reasons the Project is Being Proposed Notwithstanding Its Significant and Unavoidable Impacts
- Significant Irreversible Environmental Changes
- Growth Inducing Impacts
- Effects Found Not to be Significant

**SECTION 5.0, *ALTERNATIVES***

This section of the EIR begins with a review of the Project Objectives (**Section 5.2, *Project Objectives***), followed by a summary of potentially significant effects (**Section 5.3, *Summary of Potentially Significant Impacts***) to provide the context for the discussion of alternatives. Alternatives considered but rejected for further analysis are discussed in **Section 5.4, *Alternatives Considered but Dismissed from Further Analysis***. The in-depth consideration and analysis of six alternatives occurs in **Section 5.5, *Alternatives Analysis***. The six alternatives analyzed are:

- Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)
- Alternative 2 – Sale and Redevelopment of the BCHD Campus
- Alternative 3 – Revised Access and Circulation
- Alternative 4 – Phase 1 Preliminary Site Development Plan Only
- Alternative 5 – Relocate Center for Health and Fitness Permanently and Reduced Parking Structure
- Alternative 6 – Reduced Height Alternative

For each of these alternatives, the EIR describes the alternative's potential environmental effects and compares the effects to those of the proposed Project. The six alternatives are briefly summarized below.

**Alternative 1 No Project Alternative**

If the proposed Master Plan were not implemented, BCHD would likely consider a local bond measure to fund seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building. If the bond measure were to be successful, a retrofit project could take the place of the proposed Master Plan project. If not, BCHD would proceed with demolishing the Beach Cities Health Center, an action that it anticipates taking within the next 2 to 3 years,

regardless of the future of the proposed Master Plan. The No Project Alternative would not introduce any new impacts that were not identified for the proposed Project. It would substantially reduce the temporary impact related to construction noise, but would still result in a significant effect of a much shorter duration. Compared to the proposed Project, the No Project Alternative would result in reduced impacts.

The No Project Alternative would not accomplish any of the other basic objectives of the Master Plan. Removal of the seismic safety hazard (Project Objective 1) would occur without achieving any of the benefits provided by the other objectives. Upon demolition of the building, the demolition site would be filled and landscaped with turf and limited hardscaping. The vacant space area left by the demolished building would have no amenities and would not adequately support community health programs (and there would be no revenue to support programs under this alternative), nor would it be a functional public park.

**Alternative 2 Sale and Redevelopment of the BCHD Campus**

The CEQA Guidelines state that *"[i]f disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed"* (CEQA Guidelines, Section 15126.6[e][3][B]). Consistent with this guidance, the EIR discusses Alternative 2, which would result in actions by others. Under Alternative 2, BCHD would sell the campus and the vacant Flagler Lot. This alternative would likely result in redevelopment of the campus and development of the vacant Flagler Lot, but because of the uncertainty of the nature of potential future actions by others the EIR does not speculate on the consequent environmental effects. Environmental impacts could be less than or greater than those of the proposed Project, depending on the uses developed and their intensity. Alternative 2 would not accomplish any of the basic Project Objectives. Redevelopment by others would likely result in demolition of the Beach Cities Health Center, eliminating the seismic safety hazard, but that is not certain. The revenue generated through sale of the properties would provide a temporary support for BCHD programs and services, but that support would be short-lived and not accomplish the Project's revenue generation objectives.

**Alternative 3 Revised Access and Circulation**

In response to the request by the City of Torrance in its response to the Notice of Preparation, the EIR includes an alternative that considers a revised access and circulation plan, with no access from Flagler Street. This alternative is described and illustrated on **Figure 5-1** and includes a one-way access to the Project site from Beryl Street (as in the proposed Project) but no driveways on Flagler Lane. The internal circulation of the Master Plan is modified to

accommodate this revised access plan and the proposed RCFE Building is slightly modified in its configuration as result. The modified configuration would result in a slight reduction in the planned programmable open space. Otherwise, the alternative site design is fundamentally similar to the proposed Project. Environmental impacts of this alternative are also similar to the proposed Project. The reduction in open space is not great enough to compromise its utility for community health programs and public use. This alternative would accomplish all of the basic Project Objectives in a manner similar to the proposed Project.

**Alternative 4 Phase 1 Preliminary Site Development Plan Only**

All six alternatives would reduce impacts. Alternatives 2, 3, 5 and 6 would further reduce impacts that are less than significant or less than significant with the mitigation measures identified in the EIR. Aside from the No Project Alternative, only Alternative 4 would substantially reduce a significant impact (significant and unavoidable construction noise) by reducing the duration of construction (eliminating altogether the second construction phase to develop Phase 2). It would be similar to the proposed Project in all other respects, with further reductions to less than significant impacts. It should be noted that even under Alternative 4, the temporary impact of construction noise, though substantially reduced, would still be considered a significant effect during the shortened duration of construction.

Alternative 4 would not achieve all six of the Project Objectives. It would achieve Project Objectives 1, 2 and 3:

1. Eliminate seismic safety and other hazards of the former South Bay Hospital Building (i.e., 514 North Prospect Avenue).

2. Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services.

3. Provide sufficient public open space to accommodate programs that meet community health needs.

**Alternative 5 Relocate Center for Health and Fitness Permanently and Reduced Parking Structure**

BCHD plans to vacate the Beach Cities Health Center building in the next 2 to 3 years to eliminate exposure of its occupants to the building's seismic safety hazard. The CHF would be temporarily relocated to another location but is planned to return to the campus to occupy a new facility in the Community Wellness Pavilion proposed as an element of the Phase 2 development

program. Alternative 5 considers a future scenario in which the CHF remains off-site permanently. The EIR's traffic study found that the CHF generates a relatively high number of daily trips and consequently represents a significant amount of the Master Plan's parking demand. Permanent relocation of the CHF would therefore allow the parking structure proposed as part of the Phase 2 development program to be reduced substantially in size, eliminating the need for approximately 200 spaces and allowing a reduction in height of two stories, approximately 30 feet.

This alternative would have similar environmental impacts to the proposed Project, though some environmental effects would be reduced. The reduced size of the parking structure and elimination of the 20,000 sf facility to house the CHF from the development program would reduce the Phase 2 construction period by 4 to 6 months, with a corresponding reduction in construction-related impacts. The temporary impact of construction noise would still be significant. The reduced height would reduce the visibility of the proposed parking structure from views to the southeast in the vicinity of Diamond Street east of North Prospect Avenue. This alternative would accomplish all of the basic Project Objectives in a manner similar to the proposed Project.

**Alternative 6 Reduced Height Alternatives**

Alternative 6 would reduce the height of the proposed RCFE Building as a means of addressing the impact to the public view of the Palos Verdes hills ridgeline identified in the **Section 3.1, *Aesthetics and Visual Resources***. This impact is addressed in MM VIS-1, but the mitigation measure does not prescribe the method of avoiding the impact. Implementation of the mitigation measure through a redesign that eliminates one or more floors of the building would reduce the ability of the proposed Project to accomplish Project Objective 4, to *"address the growing need for assisted living with on-site facilities."* It may also inhibit fulfillment of Project Objective 2, to *"generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services,"* and Project Objective 6, to *"generate sufficient revenue through mission-derived services and facilities to address growing future community health needs."* Mitigation Measure MM VIS-1 may lead to a project that fails to accomplish most of the basic Project Objectives. For this reason, the EIR considers Alternative 6, which would reduce the height of the proposed RCFE Building, but instead of eliminating square footage, this alternative would redistributes it as a 3-story addition to the building along the eastern perimeter of the Project site (see **Figure 5-2**). The EIR assesses the environmental effects of the alternative and finds that its impacts would be similar to the proposed Project (construction noise would

differ from the proposed Project in location and duration, but would remain significant and unavoidable). Alternative 6 would result in a reduction of proposed open space (displaced by the 3-story addition) identified in Project Objective 3 as a key project element. Nevertheless, the EIR concludes that Alternative 6 would accomplish all of the basic Project Objectives, because the remaining open space would still be sufficient to accommodate community health programs.

**Environmentally Superior Alternative**

CEQA requires the EIR to identify the environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. The EIR finds Alternative 4 to be the environmentally superior alternative, because it would substantially reduce the duration of the temporary but significant construction noise impact. Although Alternative 5 would also substantially reduce the duration of construction noise (by 4 to 6 months), the reduction achieved by Alternative 4 would be much greater (28 months).

**SECTION 6.0, *LIST OF PREPARERS***

This section lists the persons responsible for preparing the EIR.

**SECTION 7.0, *REFERENCES***

References cited in the EIR are listed by environmental topic.

**SECTION 8.0, *INTRODUCTION TO THE FINAL EIR***

Provides an introduction to the purpose and format of the Final EIR.

**SECTION 9.0, *RESPONSES TO COMMENTS ON THE DRAFT EIR***

Provides detailed written responses to each of the 303 written comments as well as each of the 17 oral comments received on the Draft EIR, consistent with the requirements of CEQA Guidelines 15088.

**SECTION 10.0, *CORRECTIONS AND ADDITIONS***

Provides a summary of the revisions to the Draft EIR that have been incorporated in response to the comments.

**SECTION 11.0, *MITIGATION, MONITORING, AND REPORTING PROGRAM***

Provides a Mitigation, Monitoring, and Reporting Program (MMRP), consistent with the requirements of CEQA Guidelines Section 15097, which identifies implementation responsibilities, monitoring, and reporting actions.

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# 1.0 INTRODUCTION

## 1.1 OVERVIEW

This Environmental Impact Report (EIR) evaluates the potential physical environmental impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project). The EIR was prepared by Wood Environment & Infrastructure Solutions, Inc. (Wood) and its team of subconsultants including iLanco Environmental, LLC (iLanco; Air Quality and Greenhouse Gas [GHG] Emissions), Fehr & Peers (Transportation), and VIZf/x (Aesthetics and Architectural Services).

As described in further detail in Section 2.0, *Project Description*, the proposed Healthy Living Campus Master Plan would redevelop the existing BCHD campus to: 1) address escalating building maintenance costs and seismic-related structural issues; and 2) to provide purpose-built facilities necessary to support BCHD's public health and wellness programs and services. BCHD has developed a detailed preliminary site development plan for Phase 1, which is evaluated in this EIR at a project level of detail. BCHD has also developed a more general development program for Phase 2 based on the design guidelines of the proposed Healthy Living Campus Master Plan and the best available planning information at this time. The Phase 2 development program has been evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights. Operational impacts have also been evaluated programmatically in that the analysis addresses maximum building space allocations.

The Project site is located along the eastern border of Redondo Beach, adjacent to the western border of Torrance (i.e., West Torrance) in Los Angeles County, California. The Project site consists of two legal parcels – the existing 9.35-acre campus and a 0.43-acre undeveloped lot at the southwest corner of Beryl Street and Flagler Lane (vacant Flagler Lot) – totaling approximately 9.78 acres. The campus (Assessor's Identification Number [AIN] 7502-017-901) is currently developed and occupied by the former South Bay Hospital (currently operated as the Beach Cities Health Center), an attached maintenance building, two privately operated medical office buildings with space that is individually leased from BCHD to a variety of tenants, and a parking structure. The Flagler Lot is an undeveloped, vacant lot owned by BCHD (AIN 7502-017-902). The majority of the campus and the vacant Flagler lot are located within Redondo Beach; however, eastern edge of these properties is partially located within City of Torrance right-of-way along Flagler Lane and Flagler Alley (see Section 2.2.1, *Project Location*).

## 1.2 LEAD AGENCY

BCHD is a California Healthcare District – one of the leading preventive health agencies in the Nation – that has served the Beach Cities (i.e., Redondo Beach, Hermosa Beach, and Manhattan Beach) since 1955. BCHD offers a range of evidence-based health and wellness programs with innovative services and facilities to promote health and well-being and prevent diseases across the lifespan of its service population – from pre-natal and children to families and older adults. Its mission is to enhance community health through partnerships, programs, and services focused on people who live and work in the Beach Cities. ~~In m~~Many BCHD services are also available to residents throughout the South Bay. BCHD strives to provide its service population with a center of excellence for intergenerational community health, livability, and well-being (see Section 2.4.1, *BCHD Mission*).

Pursuant to Section 21067 of the California Environmental Quality Act (CEQA) as well as CEQA Guidelines Sections 15367 and 15050 through 15053, BCHD is the lead agency under whose authority this environmental document has been prepared. The lead agency is the public agency that has the principal responsibility for approving or carrying out a project. The lead agency decides whether a project is subject to CEQA or is categorically exempt, and, if subject to CEQA, whether an EIR, Mitigated Negative Declaration, or Negative Declaration will be required for the project.

## 1.3 PURPOSE AND LEGAL AUTHORITY

This EIR has been prepared in accordance with the CEQA Guidelines, published by the California Natural Resources Agency (Title 14 of the California Code of Regulations [CCR] Section 15000 *et seq.*). It is intended to provide information to decision-makers, public agencies, and the general public regarding the potential physical environmental impacts that would result from implementation of the proposed Project. Under the provisions of CEQA, *"the purpose of the environmental impact report is to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which significant effects can be mitigated or avoided"* (Public Resources Code 21002.1[a]). This EIR analyzes the environmental effects of the proposed Project to the degree of specificity required under CEQA Guidelines Section 15146. The analysis considers the construction and operational activities associated with the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – to determine the short- and long-term physical environmental effects. The EIR also considers the Design Guidelines and other relevant elements of the proposed Healthy Living Campus Master Plan that may result in or otherwise mitigate physical environmental impacts associated with the proposed redevelopment of the

campus. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, the EIR discusses both direct and indirect impacts as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

Given the location of the Project site in Redondo Beach, Redondo Beach is a responsible agency with discretionary permit authority. Redondo Beach will be responsible for considering this EIR and reaching their own conclusions on whether and how to approve the proposed Project. Torrance is also a responsible agency and will similarly be responsible for considering this EIR and reaching their own conclusions regarding activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley (e.g., curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way).

The CEQA environmental review process was established to enable public agencies to evaluate a project in terms of its environmental consequences, to examine and implement mitigation measures for eliminating or reducing any potentially adverse impacts, and to consider alternatives to the project. While CEQA Guidelines Section 15021(a) requires that major consideration be given to avoiding environmental damage, pursuant to CEQA Guidelines Section 15021(d) the lead agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including social and economic goals, in determining whether and in what manner a project should be approved. If significant environmental impacts cannot be mitigated to a level considered less than significant, the impacts are considered to be significant and unavoidable. In accordance with CEQA Guidelines Section 15093, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a *"Statement of Overriding Considerations."*

## 1.4 PUBLIC REVIEW AND COMMENTS

As a first step in complying with the procedural requirements of CEQA, BCHD prepared an Initial Study (IS) to determine if any aspect of the proposed Project, either individually or cumulatively, may cause a significant effect on the environment, and based on that determination, to narrow the focus (or scope) of the subsequent environmental analysis (see Appendix A). For the proposed Project, the IS found that this EIR should cover all environmental issue areas required by CEQA with the exception of Agriculture and Forestry Resources, Mineral Resources, Recreation, and Wildfire (see Section 1.7, *Scope of the EIR*). Tribal Cultural Resources are evaluated along with Cultural Resources in Section 3.4, *Cultural Resources and Tribal Cultural Resources*. The public

was provided an opportunity to comment on the scope of the EIR through a Notice of Preparation (NOP) which was made available to Federal, State, and local agencies and interested members of the public through various methods. The NOP was advertised to the general public electronically on the BCHD website and monthly calendar, via news releases, and posters placed in the BCHD Community Services office and Center for Health and Fitness (CHF). Physical copies of the NOP and IS were delivered to public libraries including Redondo Beach Main, North Branch, Hermosa Beach, Manhattan Beach, and Isabel Henderson branch in Torrance. The NOP and IS were also distributed to the Governor's Office of Planning and Research (OPR), school superintendents, and City Councilmembers in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach. The NOP comment period ran from June 27, 2019 to July 29, 2019 (see Appendix A). Comments made during the comment period for the NOP were considered and addressed during EIR preparation (see Appendix A).

As with the NOP and IS, the Draft EIR ~~has also been~~ was made available to Federal, State, and local agencies as well as interested members of the public. CEQA requires a 45-day comment period for the Draft EIR. However, given the ongoing COVID-19 pandemic and in an interest to facilitate increased levels of public participation, BCHD ~~has~~ extended the comment period to 90 days in order to ensure the public has ample time to review and comment. The public comment period ~~begins~~ began on March 10, 2021~~ and will end on~~ and ended on June 10, 2021. ~~Written comments or questions regarding the Draft EIR should be addressed to:~~

~~Nick Meisinger~~
~~Wood Environment & Infrastructure Solutions, Inc.~~
~~Environmental Planner~~
~~9177 Sky Park Court~~
~~San Diego, CA 92123~~
~~EIR@bchd.org~~

Additionally, oral public comments ~~will be~~ were received during the three virtual public meetings hosted by BCHD to describe the findings of the Draft EIR.

~~Following the public review period, a Final EIR will be prepared.~~ The Final EIR was prepared following the public review period and ~~will include~~ includes responses to all written and oral comments received during the public review period. See Appendix N for the complete compiled record of the written and oral comments received on the Draft EIR and see Section 9.0, *Responses to Comments on the Draft EIR* for written responses to each of these comments as required by CEQA Guidelines Section 15088.

## 1.5 REQUIRED APPROVALS

The following entitlements and approvals would apply to various components of the proposed Healthy Living Campus Master Plan – including the Phase 1 preliminary site development plan and the Phase 2 development program:

- Adoption of the proposed Healthy Living Campus Master Plan (BCHD Board of Directors);
- City Engineer approval of the building plan or design for the Phase 1 preliminary site development plan and Phase 2 development program under the proposed Project pursuant to Redondo Beach Municipal Code (RBMC) Section 2-6.1.05 (Redondo Beach Planning Commission; Redondo Beach Engineering Services Division);
- Conditional Use Permit for Phase 1 preliminary site development Plan and Phase 2 development program under the proposed Project pursuant to RBMC Section 10-2.2506 within the P-CF and C-2 zones (Redondo Beach Planning Commission);
- Building, grading, shoring, plumbing, electrical, mechanical permits from the City of Redondo Beach (Redondo Beach Building & Safety Division);
- Landscape and Irrigation Plan pursuant to RBMC Section 10-2.1900 (Redondo Beach Building & Safety Division);
- Sign review subject to Administration Design Review or Planning Commission Design Review pursuant to RBMC Section 10-2.1806 (Redondo Beach Building & Safety Division);
- Community Development Department approval for shared parking pursuant to RMBC Section 10-2.1706 (Redondo Beach ~~Building & Safety~~Planning Division);
- Landscape and Irrigation Plan approval pursuant to RBMC Section 10-2.1900 (Redondo Beach Building & Safety Division);
- City Engineer approval of improvements to curbs, gutters, sidewalks, driveways, and construction of retaining walls associated with the one-way driveway and pick-up/drop-off zone as well as the service and loading dock entrance along Flagler Lane pursuant to Torrance Municipal Code (TMC) Section 74.3.2 and 74.3.4 (Torrance Engineering Division)
- Grading Permit pursuant to TMC Section 81.2.49 (Torrance Engineering Division);
- City Engineer approval of a building permit for retaining walls associated with the service area and loading dock entry/exit pursuant to TMC Section 92.13.2 (Torrance Engineering Division).
- Landscape Plan approval pursuant to TMC Section 92.30.6 (Torrance Community Development Department)

- Wastewater Discharge Permit (Los Angeles Regional Water Quality Control Board [RWQCB]);
- Standard Urban Storm Water Mitigation Plan (Los Angeles RWQCB); ~~and~~
- Permit to Construct (South Coast Air Quality Management District); and
- Transportation permit for transportation of heavy construction equipment on State highways (California Department of Transportation [Caltrans]).

Other ministerial permits related to construction activities – haul routes, extended construction hours, etc. – would also be required.

## 1.6 PROJECT BACKGROUND

*The CWG was formed in 2017 to represent the various populations and organizations in the Beach Cities and to serve as a community sounding board and guidepost. The proposed Project was developed as a result of more than 60 meetings hosted over a 3-year period and attended by more than 550 community members.*

In 2017, BCHD began investigating escalating maintenance costs and seismic-related structural issues associated with the former South Bay Hospital, originally constructed in 1958. Following initial public outreach with neighbors, residents, and community leaders in May 2017, BCHD formed a 20-person Community Working Group (CWG) to engage local participants in the planning of a modernized campus that would be integrated with the surrounding community including Redondo Beach and the Torrance. The CWG consisted of an informal, voluntary group of stakeholders from each of the three Beach Cities and the Torrance. Participants included leaders from local businesses, civic organizations, older adult services, the Blue Zones Project, and neighboring residents. The focused group was formed to engage in constructive collaboration and assisting in distributing information to the community at the planning process progressed. The CWG held 17 meetings to discuss various components of the proposed Healthy Living Campus Master Plan and was eventually dissolved in December 2020 following the conclusion of the preliminary planning and design phases for the proposed Healthy Living Campus Master Plan.

BCHD staff also conducted outreach for the Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan. Study circles (i.e., informal

group sessions) were comprised of diverse stakeholders from Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach and were designed to encourage local input into the planning process for the proposed Healthy Living Campus Master Plan. The three study circles were each centered on a primary focus, which included Intergenerational Programs, Creating Community Gathering Spaces, and Creating a Center of Excellence. Key comments collectively expressed by participants were related to accessibility and inclusivity of the campus, improving transportation options, providing activities and facilities for all ages, creating multi-use outdoor spaces, and fostering community connections to provide an inclusive and welcoming environment.

*BCHD has held two Open Houses since the start of the project. Open House events allowed community members and key stakeholders the opportunity to walk the campus, learn about the proposed Healthy Living Campus Master Plan, provide comments, and ask questions directly to project team members.*

BCHD also held two community Open House events in November 2017 and March 2019 to inform community members and key stakeholders of the plans being considered. Open House events also provided an opportunity for attendees to ask questions and contribute comments. The first Open House introduced the proposed Healthy Campus Master Plan and provided nine informational stations, including but not limited to About BCHD, Project Overview, Community Need, EIR Process, and CHF. The second Open House provided the general public with an updated description of the Healthy Living Campus project, visualizations of its design, walking tours of the campus and opportunities for public involvement. The event also highlighted the existing and proposed programs and services provided by BCHD.

The refined Healthy Living Campus Master Plan as analyzed in this EIR was developed from more than 60 meetings over 2 years attended by more than 550 community members and drawing more than 1,000 comments regarding individual elements of the Master Plan. A timeline of key community outreach events associated with the proposed Healthy Living Campus Master Plan is summarized in Table 1-1.

## Table 1-1. Overview of the Outreach and Planning Process

| Date | Meeting Type/Host | Overview |
|---|---|---|
| June 2017 | CWG Meeting | CWG hosted a meeting to gather input from the community on the first iteration of the proposed Healthy Living Campus Master Plan. |
| July 2017 | CWG Meeting | CWG held a Campus Features Feedback presentation which began with a summary of the feedback received from the CWG, BCHD staff, and BCHD volunteers regarding potential development features. |
| August 2017 | CWG Meeting | CWG held a meeting on the preliminary plans for the proposed CHF which began with a summary of the CWG's feedback on the plans and the plan refinements that were made to address the feedback. |
| September 2017 | Focused BCHD Outreach Meeting | BCHD staff met with six condominium owners who comprise the Board of the Homeowner's Association of 1321 Beryl Street in Redondo Beach where owners could share their concerns. |
| October 17, 2017 | Community Open House | An open house with 156 attendees was held to provide community members and key stakeholders with opportunities to learn about the conceptual plans being considered, provide comments, and ask questions directly to design team members. |
| October 19, 2017 | Focused BCHD Outreach Meeting | BCHD presented the proposed Healthy Living Campus Master Plan to approximately 20 attendees at a community meeting for Redondo Beach District 3 residents following invitation from District 3 Councilmember Christian Horvath. |
| November 2017 | CWG Meeting | CWG met again to discuss refinements that had been made to the site design based on community input from the October 2017 meetings. |
| January 2018 | CWG Meeting | CWG provided a summary of outreach conducted and feedback received since the inception of the proposed Healthy Living Campus Master Plan, including 44 community presentations and meetings with groups of various sizes. It was also disclosed that the EIR process had been delayed due to new seismic-related structural information. |
| March 2018 | CWG Meeting | CWG proposed opportunities for public participation to take a broader view of the campus while continuing to engage community feedback and ensuring BCHD meets program goals. |
| June 13, 2018 | BCHD Study Circle (Public) | BCHD provided opportunities for participants consisting of 54 attendees to discuss and share insights on Intergenerational Programs. |
| June 18, 2018 | CWG Meeting | CWG summarized previous input and included discussion and suggestions for pedestrian and cyclist safety and traffic conditions on North Prospect Avenue. |
| August 1, 2018 | BCHD Study Circle | BCHD held group exercises for 56 attendees to discuss Creating Community Gathering Spaces to gather input for the Master Plan. |
| August 20, 2018 | CWG Meeting | BCHD staff provided an update on potential campus improvements on the southwest corner of the property based on feedback received from residents, namely those along Diamond Street; CWG provided comments regarding Creating Community Gathering Spaces. |
| September 2018 | BCHD Study Circle | BCHD facilitated a study circle for 50 attendees to discuss the topic of Creating a Center of Excellence. Feedback generally focused on marketing and research, creating an inclusive and welcoming environment, community engagement and involvement, and strengthening and expanding partnerships. |
| January 2019 | CWG Meeting | BCHD provided a description of the updated Healthy Living Campus Master Plan as compared to the original 2017 iteration. |

**Table 1-1. Overview of the Outreach and Planning Process (Continued)**

| Date | Meeting Type/Host | Overview |
|---|---|---|
| February 2019 | CWG Meeting | CWG held a Master Plan Financial Strategy meeting to discuss financial strategies for the proposed Project and review feedback received from previous outreach events. |
| March 2019 | Community Open House | A second Open House with 139 attendees from the surrounding area, including the Beach Cities and Torrance, provided a walking tour of the campus and opportunity to learn more about existing BCHD programs and services. |
| April 2019 | CWG Meeting | BHCD described the requirements of CEQA and the timeline for the EIR process. |
| June 2019 | BCHD Staff Meeting | This meeting recapped the status of the updated Healthy Living Campus Master Plan and described two other Redondo Beach projects that are unrelated to the Master Plan but would impact access to the campus. |
| July 2019 | Public Scoping Meetings | BCHD presented the IS and held five public scoping meetings to present the 2019 Master Plan and gather feedback on the scope of the EIR (refer to Section 1.4, *Public Review and Comments*). |
| December 2019 | CWG Meeting | BCHD staff reviewed the highlights of the Healthy Living Campus Master Plan since formation of the CWG in June 2017 and the status of the EIR process. |
| June 2020 | CWG Meeting | This meeting was held virtually (due to restrictions related to the COVID-19 pandemic) to describe plan refinements to the 2019 Master Plan based on the extensive public comments on the potential constraints during the NOP period. |
| December 2020 | CWG Meeting | BCHD staff reviewed objectives of the proposed Project and the key planning milestones of the proposed Healthy Living Campus, highlighting the major public engagement activities since May 2017, including an open house in October 2017 and more than 60 public meetings to date garnering more than 1,000 comments. |

### 1.6.1 Summary of Revisions to the Proposed Healthy Living Campus Master Plan

Following the release of the conceptual plans for the proposed Healthy Living Campus Master Plan to the public in June 2017, community feedback indicated a common desire for more active open spaces and community gathering spaces, integration with community, and increased accessibility through the campus, including walking and biking paths. Common concerns were also related to building heights, density, and potential transportation-related impacts of the proposed Project. Comments received during the 2018 Study Circles indicated a desire for an intergenerational campus, an inclusive and welcoming community, and active open space. The 2019 Master Plan refined the original conceptual plan including the removal of the proposed parking structure from the vacant Flagler Lot, and relocation to the southeast corner of the campus. The 2019 Master Plan also featured reduced building heights, the removal of the previously proposed site access from Diamond Street, and the addition of a Community Wellness Pavilion.

The 2019 Master Plan also relocated the proposed buildings to enhance active open space and community gathering spaces.

Following community outreach efforts for the 2019 Master Plan, including a second community Open House in March 2019 and five public scoping meetings in July 2019, BCHD received continued concerns regarding the proposed density and number of residential units. Community response to the 2019 Master Plan also indicated the community's concerns over impacts to neighbors, including the long construction period (i.e., three individual 3-year long phases spanning a period 15 years) and the impacts on neighborhood traffic. Common concerns were also related to views of the proposed buildings from the surrounding residential neighborhoods.

In response to the community's concerns described above, BCHD downsized the development envisioned in the Healthy Living Campus Master Plan by 203 Assisted units and 107,800 sf of occupied building space under the 2020 Master Plan. Additionally, the construction period was reduced from three phases and 9 years of active construction to two phases and 5 years of active construction to address the community's concerns regarding construction-related impacts to air quality, noise, and traffic (see Table 1-2).

The proposed circulation scheme has been revised such that Flagler Lane would no longer serve as primary parking entrance as previously proposed under the 2019 Master Plan. Instead, only service and delivery vehicles would access the campus through the Flagler Lane vehicle entrance. The vehicle entrance to the RCFE Building was reconfigured as a one-way driveway with access from Beryl Street, with a left-turn-only exit onto Flagler Lane.

To address concerns for effective community benefits and intergenerational uses, the 2020 Master Plan includes a Program of All-Inclusive Care for the Elderly (PACE), a Youth Wellness Center, and an Aquatics Center. PACE would provide comprehensive medical and social services (e.g., adult day care, meals, nutritional counseling, dentistry, primary care including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation for older adults. The Youth Wellness Center would provide after-school behavior and health program for school-aged children (i.e., ages 12-18) and young adults (i.e., ages 18-25) with ~~to~~ access to social services and life skills, job skills, mental health, sexual health services, etc. The Aquatics Center would provide an indoor leisure pool for adult and child swimming lessons and water aerobics classes, an indoor heated therapy pool that could be used by CHF members and support programming for PACE participants and campus residents, and an outdoor pool designed for fitness activities and offering play features (e.g., slide, river current, etc.) (see Section 2.0, *Project Description*).

**Table 1-2. Summary of Revisions to the Proposed Healthy Living Campus Master Plan**

| | Existing Campus | 2019 Master Plan | 2020 Master Plan (Proposed Project) |
|---|---|---|---|
| Summary of Changes | - | Increased open space, addition of 360 net new RCFE units | Reconfigured RCFE Building, removed Child Development Center, one-way driveway and pick-up/drop-off zone, fewer RCFE units |
| Programs | Medical Office, Beach Cities Silverado Memory Care Community, Community Services, CHF | RCFE, Community Services, Child Development Center, Wellness Pavilion, CHF | Assisted Living, Memory Care, PACE, Community Services, Wellness Pavilion, Aquatics Center, CHF, Youth Wellness Center |
| Number of RCFE Units | 60 | 420 (360 net new) | 217 (157 net new) |
| Total Occupied Building Area (sf) | 260,4000 | 592,700 | 484,900 |
| Active Construction Time (years) | - | 9 | 5 |
| Number of Stories | 4 | 4 | 7 |
| Active Open Space (acres) | 0.3 | 3.6 | 2.45 |

## 1.7 SCOPE OF THE EIR

This EIR assesses the potential environmental impacts of the proposed Healthy Living Campus Master Plan, including the Phase 1 preliminary site development plan and the Phase 2 development program. The scope of the EIR includes assessment and evaluation of potentially significant physical environmental impacts identified in the IS and comments in response to the NOP as well as scoping discussions among the City of Redondo Beach and the City of Torrance. The IS, NOP, and comment letters received during the NOP review period are included in Appendix A. The IS determined that construction and/or operation of the proposed facility may result in potentially significant impacts with respect to the following issue areas, which are addressed in detail in this EIR:

- Aesthetics and Visual Resources
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation
- Utilities and Service Systems

This EIR addresses the issues referenced above and identifies potential physical environmental impacts, including cumulative effects of the proposed Project, in accordance with the provisions set forth in CEQA and the CEQA Guidelines. In addition, the EIR recommends feasible mitigation measures, where possible, that would reduce or eliminate significant adverse environmental effects.

In accordance with CEQA Guidelines Section 15128, physical environmental impacts related to Agriculture and Forestry Resources, Mineral Resources, Recreation, and Wildfire were not considered potentially significant based on the findings of the IS (see Appendix A). These environmental resources are not further addressed in the EIR because they were determined not to be relevant to or because the proposed Project clearly has no potential impact related to certain topics. Further, additional topics within environmental issue areas that were not anticipated to result in potentially significant impacts were eliminated from further assessment in the EIR through the IS. The resource sections and topics not discussed further in the EIR include:

- Damage to scenic resources along a State-designated scenic highway (Section I, *Aesthetics* of the IS): There are no designated state scenic highways or other designated scenic resources near the Project site; the nearest designated highway is the Mulholland Highway, located approximately 20 miles to the northwest.
- Impacts to species identified as a candidate, sensitive, or special status species (Section II, *Biological Resources* of the IS): The Project site is completely developed and nearly 90-percent paved and special status species are unlikely to occur, and the Biological Resources Survey completed for the Project site concluded that the site does not provide suitable habitat for any candidate, sensitive, or special status species in local or regional plans, policies, or regulations.
- Impacts to riparian habitat or other sensitive natural community (Section II, *Biological Resources* of the IS): No riparian habitat or other sensitive natural communities exist on or adjacent to the Project site.
- Impacts to state or federally protected wetlands (Section II, *Biological Resources* of the IS): The Project site is completely developed and there are no potential wetlands located on the Project site or in the nearby vicinity.
- Conflict with an adopted local, regional, or State Habitat Conservation Plan (Section II, *Biological Resources* of the IS): The Project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.

- Conflict with or obstruction of a state or local plan for renewable energy or energy efficiency (Section VI, *Energy* of the IS): The proposed Project would not displace any existing renewable energy facilities, would include the installation of solar electric and solar hot water systems as well as a stormwater capture system, and would comply with energy efficiency standards in the California Building Code.
- Adverse effects including risk of loss, injury, or death related to rupture of a known earthquake fault (Section VII, *Geology and Soil* of the IS): There are no known active faults on or adjacent to the Proposed site and the proposed Project is not located within an Alquist-Priolo Earthquake Zone.
- Impacts related to soils incapable of adequately supporting septic tanks or alternative wastewater disposal facilities where sewers are not available (Section VII, *Geology and Soils* of the IS): The Project site and surrounding area is served by an existing sewer system; septic tanks would not be installed for the proposed Project.
- Safety hazards or excessive noise for people residing or working in a project area located within an airport land use plan or within 2 miles of an airport (Section IX, *Hazards and Hazardous Materials* of the IS): The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not subject workers, clients, or visitors of the Project site to substantial hazards related to aircraft operating to or from the Hawthorne Municipal Airport or Los Angeles International Airport (LAX).
- Redirection of flood flows (Section X, *Hydrology and Water Quality* of the IS): There are no streams or rivers that traverse the Project site, and the proposed Project would not result in an impediment or alteration of flood flows.
- Release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone (Section X, *Hydrology and Water Quality* of the IS): The Project site is located outside of 100-year and 500-year flood zones and the tsunami inundation zone, and is not located near inland water bodies.
- Physical division of an established community (Section XI, *Land Use and Planning* of the IS): Development would be consistent with existing land uses and would not remove or divide any residential units.
- Exposure of people residing or working in the project area to excessive noise levels for projects located within the vicinity of a private airstrip or an airport land use plan (Section XIII, *Noise and Vibration* of the IS): The Project site is not located in the vicinity of a private airstrip or Airport Influence Area for the Hawthorne Municipal Airport or and LAX.

- Displacement of existing people or housing (Section XIV, *Population and Housing* of the IS): The proposed Project would occur within the existing campus and would not remove or displace any housing or residential areas.
- Impacts associated with the need for or provision of new or physically altered schools (Section XV, *Public Services* of the IS): The proposed Project includes the development of 157 new Assisted Living units for use by the elderly and would not result in an increase in the number of students to the Redondo Beach Unified School District.
- Impacts associated with the need for or provision of new or physically altered parks (Section XV, *Public Services* of the IS): Implementation of the proposed Project would increase recreational space and result in a beneficial impact to recreational facilities in Redondo Beach.
- Impacts associated with the need for or provision of new or physically altered libraries (Section XV, *Public Services* of the IS): The robust library system in Redondo Beach would be able to accommodate the modest increase in population under the proposed Project.

Cumulative effects, which consider other projects in the immediate vicinity that are expected to be operational at the time the proposed Project would be built, are discussed in each resource area analysis section of EIR. The cumulative analyses represent a comprehensive assessment of potential impacts using a list of past, present, and probable future projects producing related or cumulative impacts in accordance with CEQA Guidelines Section 15130(b)(1)(A) (see Section 3.0.2, *Cumulative Impacts*).

## 1.8 AREAS OF KNOWN PUBLIC CONTROVERSY

CEQA Guidelines Section 15123 states that an EIR shall identify areas of controversy known to the lead agency, including issues raised by public agency as well as interested members of the public. Based on community meetings held between 2017 and 2020 as well as agency and public comment letters received on the NOP (see Appendix A), the following environmental issues are known to be of concern and may be controversial (each issue ~~will be further discussed~~ is discussed further in the EIR):

- Potential construction-related air quality and noise impacts to on-site and adjacent sensitive receptors, including but not limit to: on-site residents of the Silverado Beach Cities Memory Care Community; off-site residents along North Prospect Avenue, Beryl Street, and Flagler Lane; nearby parks (e.g., Dominguez Park); and schools (e.g., Towers Elementary School) (see Sections 3.2, *Air Quality*, and Section 3.11, *Noise*).

- Potential impacts related to fugitive dust emissions and human health risk during construction activities, particularly within the adjacent residential neighborhoods (see Section 3.2, *Air Quality*).
- Duration and extent of on- and off-site noise and vibration impacts associated with the use of heavy construction equipment. (see Section 3.11, *Noise*)
- Potential impacts to existing biological resources (e.g., mature trees and landscaping along Flagler Lane; (see Section 3.3, *Biological Resources*)
- Compliance with the National Pollutant Discharge Elimination System Program and development of a Stormwater Pollution Prevention Plan that addresses erosion, particularly along Flagler Lane and Flagler Alley (see Section 3.9, *Hydrology*).
- Potential construction-related impacts on pedestrian and bicycle safety, especially as it relates to truck traffic within the vicinity of nearby residential neighborhoods, parks, and schools (see Section 3.14, *Transportation*).
- Construction planning and monitoring (e.g., standard construction times, heavy haul truck routes, temporary road and sidewalk closures, construction flaggers, etc.) (see Section 3.11, *Noise*).
- Building height compatibility (e.g., bulk, mass, and scale) and potential impacts to the existing public views and shade/shadows, particularly within the adjacent residential neighborhoods (see Section 3.1, *Aesthetics and Visual Resources*).
- Potential for the former South Bay Hospital or other buildings on campus to merit review by the Redondo Beach Historic Preservation Commission and the potential to encounter archaeological resources during construction (see Section 3.4, *Cultural Resources and Tribal Cultural Resources*).
- Seismicity, soil stability, and other related on-site geologic hazards (see Section 3.6, *Geology and Soils*).
- GHG emissions associated with construction and operational activities of the proposed Healthy Living Campus Master Plan (see Section 3.7, *Greenhouse Gas Emissions*).
- Noise impacts associated with operations under the proposed Healthy Living Campus Master Plan (e.g., frequency of emergency response and associated noise from sirens; see Section 3.11, *Noise*).
- The potential for exposure to hazardous materials including but not limited to asbestos, lead-based paints, mold, and other materials associated with the former South Bay Hospital (see Section 3.8, *Hazards and Hazardous Materials*).
- Potential impacts associated with the previously decommissioned oil and gas well on the vacant Flagler Lot (e.g., exposure to hazardous substances) (see Section 3.8, *Hazards and Hazardous Materials*).

- Potential impacts associated with contaminants from adjacent land uses (e.g., tetrachloroethylene [PCE] associated with historical dry-cleaning operations; see Section 3.8, *Hazards and Hazardous Materials*).
- Land use and zoning compatibility (see Section 3.10, *Land Use and Planning*).
- Increased vehicle congestion (see Section 3.14, *Transportation* and Appendix J).[1]
- On-site parking requirements and potential impacts to off-site parking (see Section 3.14, *Transportation*).[2]
- Cut-through traffic through nearby residential neighborhoods in Torrance (see Section 3.14, *Transportation*).
- Potential for circulation changes related to the vehicle driveways associated with the proposed Project and the potential increased risk of hazards along Flagler Lane, Towers Street, and other local roadways (see Section 3.14, *Transportation*).
- Integration with existing and proposed multi-modal transportation connections (see Section 3.14, *Transportation*).
- Potential increases in utility usage at the Project site (i.e., electricity, water, and sewer; see Section 3.5, *Energy* and Section 3.15, *Utilities and Service Systems*).
- Increased instances of emergency response and potential effects on public service demands (see Section 3.12, *Population and Housing*).

## 1.9 ORGANIZATION OF THE EIR

This EIR is organized into the following eight sections.

- *Executive Summary*, provides a summary-level description of the proposed Project, physical environmental impacts, and required mitigation measures.
- Section 1.0, *Introduction*, summarizes the background of the proposed Project and explains the environmental review process.
- Section 2.0, *Project Description,* provides a detailed description of the proposed Project and the Project site setting.
- Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, is organized according to major environmental topics and provides analysis of existing environmental

[1] Pursuant to ~~CEQA Guidelines~~ Public Resources Code Section 21099(b)(2), vehicle delay as described by level of service or similar measures of capacity or traffic congestion, shall not be considered significant impacts on the environment. Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, a Non-CEQA Intersection Operation Analysis has been prepared and provided in Appendix J.

[2] Recent caselaw has confirmed that effects to parking supply and demand are not CEQA issues and are not included in Appendix G of the CEQA Guidelines. However, physical impacts related to parking have been addressed in the EIR (*Covina Residents for Responsible Development v. City of Covina [City Ventures, Inc., et al., Real Parties in Interest] [2018]* 21 Cal.App.5th 712).

conditions, Project-specific impacts, mitigation measures, cumulative impacts, and residual impacts after mitigation for each topic.

- Section 4.0, *Other CEQA Considerations*, identifies significant and irreversible, growth-inducing, and unavoidable effects, as well as resource areas that would not be significantly affected by the proposed Project.
- Section 5.0, *Alternatives*, describes alternatives to the proposed Project, and identifies the Environmentally Superior Alternative.
- Section 6.0, *List of Preparers*, identifies the lead agency and consultant team that prepared the EIR.
- Section 7.0, *References and Persons or Organizations Contacted*, provides information about resources used in the preparation of the EIR.

*Appendices* to the EIR include the NOP and responses to the NOP (see Appendix A) as well as the supporting technical studies used as a basis of information and analyses in preparation of the environmental analysis in the EIR (Appendix B through M). Appendix N provides a complete compiled record of the written and oral comments received on the Draft EIR.

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# 2.0 PROJECT DESCRIPTION

## 2.1 INTRODUCTION

The proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) would redevelop the existing BCHD campus located in Redondo Beach and adjacent to Torrance to the east. The proposed Project includes a preliminary site development plan under Phase 1 and a more general long range development program under Phase 2.

| Proposed Project at a Glance | |
|---|---|
| **Phase 1 – Preliminary Site Development Plan** | |
| New Assisted Living Units | 157 units |
| New PACE Services | 14,000 sf |
| New Youth Wellness Center | 9,100 sf |
| Relocation of Memory Care Units | 60 units |
| Relocation of Community Services Space | 6,270 sf |
| Demolition of the Beach Cities Health Center | 158,000 sf |
| Demolition of the Maintenance Building | 3,200 sf |
| **Phase 2 – Development Program** | |
| New Wellness Pavilion | 37,150 sf |
| New Aquatics Center | 31,300 sf (24,000-sf indoor area and 7,300-sf outdoor area) |
| Relocation of Center for Health and Fitness Back to the Campus | 20,000 sf |

The campus was originally developed in 1958, beginning with the construction of the South Bay Hospital (514 North Prospect Avenue), which was later converted to the Beach Cities Health Center in the 1990s to support outpatient medical uses (LSA 2018; see Section 3.4, *Cultural Resources and Tribal Cultural Resources*). The two medical office buildings (510 and 520 North Prospect Avenue) were added to the campus in 1976 and 1989, respectively. The Beach Cities Health Center, and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue), have seismic-related structural deficiencies because they were constructed prior to development of modern seismic safety standards (Nabih Youssef Associates 2018; see Section 3.6, *Geology and Soils*). Additionally, due to their age, these buildings require substantial annual

*The existing campus includes three buildings, a parking structure, and a subterranean parking garage surrounded by paved asphalt surface parking. The eastern edge of the campus is lined by mature trees; however, the remainder of the campus generally lacks landscaping or open space.*

maintenance. Within the near future (i.e., approximately 2 to 3 years), BCHD's annual maintenance costs for the campus are expected to exceed the annual operational revenues. If prolonged, this operational deficit would lead to a reduction in BCHD programs and may ultimately lead to insolvency.

New development under Phase 1 would include a 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) Building with 157 new Assisted Living units, 60 Memory Care units (replacing the existing Silverado Beach Cities Memory Care Community located within Beach Cities Health Center), 14,000 sf of space for the Program of All-Inclusive Care for the Elderly (PACE), 6,270 sf of space for Community Services, and a 9,100-sf Youth Wellness Center. The RCFE Building would include a new one-way driveway and pick-up/drop-off zone located on the vacant Flagler Lot as well as a new subterranean service area and loading dock entry/exit along Flagler Lane. Following the construction of the RCFE Building, the existing 158,000-sf Beach Cities Health Center would be demolished providing space for approximately 114,830 sf of open space as well as an approximately 40,725-sf landscaped surface parking lot with 86 new parking spaces (including accessible parking spaces and electric vehicle [EV] charging stations). The preliminary site development plan under Phase 1 is described in detail in Section 2.5.1, *Phase 1 Preliminary Site Development Plan*.

- **ASSISTED LIVING:** Assisted Living is for older adults that need help with daily care. Assisted living residents usually live in their own apartments or rooms and share common areas. They have access to many services, including meals; assistance with personal care; help with medications, housekeeping, and laundry; and social and recreational activities.
- **MEMORY CARE:** Memory Care is similar to Assisted Living, but provides specialized services and more intensive 24-hour care for people with mental impairments (e.g., Alzheimer's, Parkinson's, Lewy body, and other types of dementia).
- **PACE:** PACE is a Medicare and Medicaid program that provides comprehensive medical and social services to older adults – involving a combination of adult day care center services and in-home care services. PACE is intended to allow older adults to remain in the community rather than receive care in an Assisted Living facility.
- **COMMUNITY SERVICES:** BCHD provides a wide variety of community services and programs including food security, housing security, safety in the home, and socialization.
- **YOUTH WELLNESS CENTER:** After-school (e.g., from 2:00 p.m. onward) behavioral and health program for school-aged children.

The long range development program under Phase 2, while less defined than the project-level preliminary site development plan under Phase 1, would provide space for a Wellness Pavilion of up to 37,150 sf, an Aquatics Center of up to 31,300 sf (including 24,000 sf of indoor space and 7,300 sf of outdoor space), and a new Center for Health and Fitness (CHF) of up to 20,000 sf, which would be relocated back on-campus. Parking would be provided in a new parking structure with up to 2 subterranean levels and up to 8.5 above ground levels. These square footages define the maximum intensity of uses, and support the analysis of operational impacts for the Phase 2 development program provided in this EIR. For example, the trip generation during Phase 2 is

dependent of the square footage of each use. However, the configuration of physical development supporting these uses could assume one of several possible site plans as described further in Section 2.5.2, *Phase 2 Development Program*. The EIR depicts three example site plans for the Phase 2 development program to illustrate the possible range. However, the EIR analyzes potential construction-related impacts (e.g., ground disturbance) and aesthetics impacts (e.g., building height) using conservative assumptions related to maximum building footprints and maximum building heights. The ultimate site development plan developed for Phase 2 would fit within this maximum building envelope.

## 2.2 EXISTING PROJECT SITE CHARACTERISTICS

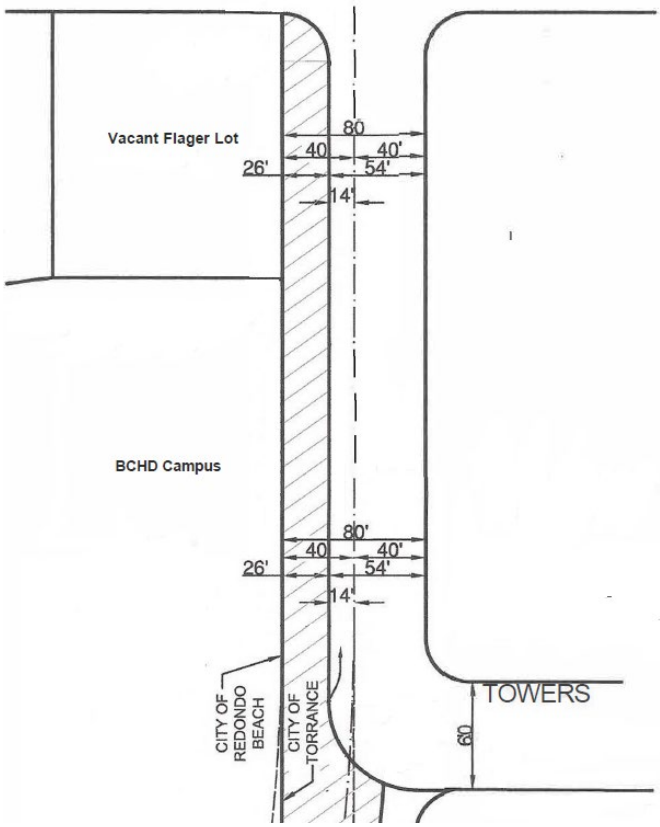
### 2.2.1 Project Location

The Project site is located along the eastern border of Redondo Beach, adjacent to the western border of Torrance (i.e., West Torrance) in Los Angeles County, California. The Project site is generally bordered by North Prospect Avenue to the southwest, Diamond Street to the southeast, Flagler Lane and Flagler Alley to the east, and Beryl Street and existing commercial development to the north and northwest (see Section 3.14, *Transportation*). The Project site consists of two legal parcels:

- The existing 9.35-acre campus (Assessor's Identification Number [AIN] 7502-017-903), which is developed with the former South Bay Hospital (currently operated as the Beach Cities Health Center), an attached maintenance building, two privately operated medical office buildings with space that is individually leased from BCHD, and a parking structure. The majority of the campus is located within Redondo Beach; however, eastern edge of the campus is partially located within City of Torrance right-of-way along Flagler Lane and Flagler Alley.
- A 0.43-acre vacant lot owned by BCHD located on the northern edge of and adjacent to the existing campus at the southwest corner of Flagler Lane and Beryl Street (vacant Flagler Lot) (AIN 7502-017-902). This lot is currently undeveloped and is periodically leased by BCHD as a temporary construction staging area for surrounding developments. This lot is currently being leased by The Gas Company as a construction staging area for gas utility improvements in the vicinity. The majority of the vacant Flagler Lot is also located with Redondo Beach; however, the eastern edge of the vacant Flagler Lot partially located within City of Torrance right-of-way along Flagler Lane.

The proposed Project would extend into the City of Torrance right-of-way at three locations. The proposed Project includes two access points with driveways along Flagler Lane. One driveway

would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed for a subterranean service area and loading dock entry/exit, which would require grading and construction of retaining walls (see Section 2.5.1.3, *Proposed Access, Circulation and Parking*). These elements of the proposed Project would require grading and building permits from the City of Torrance (refer to Section 1.5, *Required Approvals*).




*The City of Torrance right-of-way extends into the vacant Flagler Lot by approximately 26 feet from the edge of the existing paved width of Flagler Lane.*

The Project also proposes to re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The proposed grading and landscaping on this portion of the slope would also require a grading permit, landscape plan approval, and site plan review from the City of Torrance (refer to Section 1.5, *Required Approvals*).

### 2.2.2 Surrounding Land Uses

The Project site is bordered to the north by the Redondo Village Shopping Center, a commercial shopping center, with one driveway from North Prospect Avenue into the Shell gas station at the western end of the shopping center and three driveways along Beryl Street. The Redondo Village Shopping Center, zoned C-2 (Commercial) by the City of Redondo Beach, is anchored by a Vons grocery store and also currently supports smaller commercial retail stores (see Figure 2-2).

wood.

**Project Vicinity and Regional Location**

**FIGURE 2-1**

wood.

**Surrounding Development**

**FIGURE 2-2**

*Single- and multiple-family residences border the campus to the south, east, and west (left). Dominguez Park (right) is located at the intersection of Flagler Lane & Beryl Street immediately to the northeast of the Project site. This 24-acre park provides picnic areas and play equipment, the park features a dog park, Heritage Court, and two Little League fields.*

*A Shell gas station (left) and the Redondo Village Shopping Center (right) border the Project site to the north. Redondo Village Shopping Center is a neighborhood-serving shopping center, with commercial uses such as a grocery store, restaurants, and fitness studios.*

Single-family residences face North Prospect Avenue opposite the Project site to the southwest, in an area zoned R-1 (Single Family Residential) by the City of Redondo Beach~~,~~. Single-family residences zoned R-1 by the City of Redondo Beach face the Project site from the southeast along Diamond Street. ~~and multi~~Multi-family residences exist to the north along Beryl Street, in an area zoned RMD (Medium Density Multi-Family Residential) by the City of Redondo Beach. The nearest multi-family residences to the Project site are located approximately 110 feet north of the vacant Flagler Lot across Beryl Street. Other multiple-family residences along Beryl Street are located approximately 250 to 500 feet to the north of the Project site, with intervening buildings associated with the Redondo Village Shopping Center (refer to Figure 2-2). Additionally, the Project site is bordered by single-family residences to the east across Flagler Lane and Flagler Alley, in an area zoned ~~R-LO (Low Density Residential)~~ R-H/R-1 (Hillside and Local Coastal Overlay Zone [Hillside Overlay]/Single Family Residential District) by the City of Torrance (refer to Figure 2-2). The closest of these single-family residences is located approximately 80 feet from the developed edge of the campus.

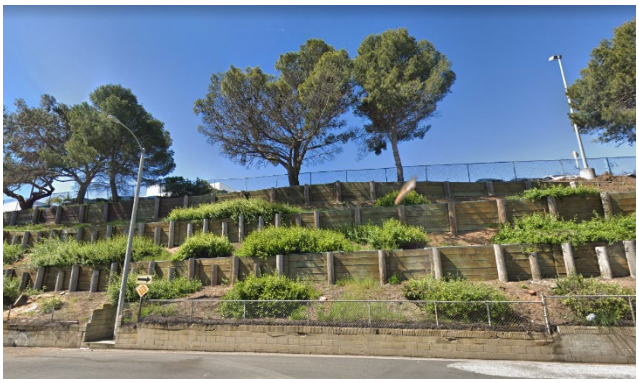
*Towers Elementary School is located approximately 300 feet east of the Project site. The main entrance to the school (left) is located along Beryl Street; however, a secondary pedestrian entrance is located along Towers Street (right) through the single-family residential neighborhood in West Torrance.*

Open space and recreational land uses in the vicinity of the Project site include Dominguez Park adjacent to and northeast of the Project site across the intersection of Beryl Street & Flagler Lane; Entradero Park approximately 1,350 feet to the east, Sunnyglen Park approximately 1,125 feet to the southeast; and the Edith Rodaway Friendship Park approximately 2,750 feet to the northwest of the Project site (see Section 3.13, *Public Services*). The following schools are also located in the vicinity of the Project site: Towers Elementary School, approximately 300 feet to the east; West High School, located approximately 2,600 feet to the southeast; Parras Middle School, approximately 2,150 feet to the south; Redondo Union High School and Redondo Shores High

School, approximately 1,400 feet to the southwest; and Beryl Heights Elementary School, located approximately 900 feet to the west (see Section 3.13, *Public Services*).

### 2.2.3 Existing Project Site

The existing campus is developed with the Beach Cities Health Center and an attached maintenance building located at 514 North Prospect Avenue, two medical office buildings located at 510 and 520 North Prospect Avenue, and a parking structure located at 512 North Prospect Avenue (see Figure 2-3).

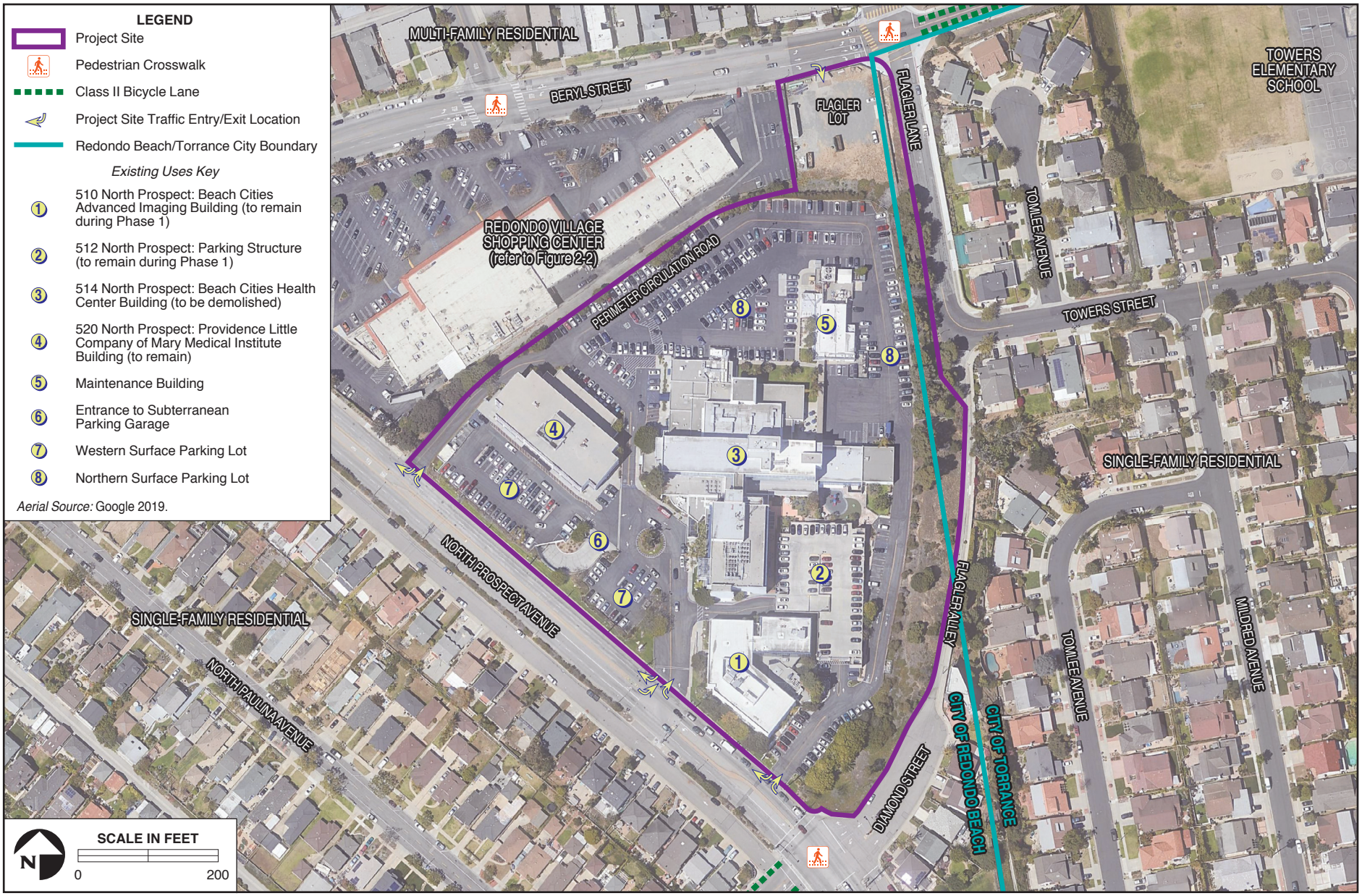


*Only the tops of the tallest buildings on the campus are visible from Flagler Lane and Flagler Alley due to the approximately 30-foot change in elevation. A series of retaining walls and landscaped vegetation support the eastern slope of the campus.*

The developed area of the Project site gently slopes from an elevation of approximately 166 feet above mean sea level (MSL) within the central area of the campus, to an elevation of approximately 146 feet MSL at the southern entrance from North Prospect Avenue. The ground level elevation of the Project site is approximately 30 feet higher than the vacant Flagler Lot as well as the residential area to the east along Flagler Lane and Flagler Alley. A series of retaining walls support the slope above Flagler Lane and Flagler Alley, which is vegetated with several large mature trees (see Section 3.3, *Biological Resources*). Landscaping on the Project site is limited primarily to perimeter planters, scattered surface parking lot trees, and a small internal lawn area. The vacant Flagler Lot is undeveloped and characterized by patches of low-growing weedy vegetation.

**Table 2-1. Existing Development within the Project Site**

| Address | Building Name | Use | Floor Area (sf) | Height |
|---|---|---|---|---|
| 510 North Prospect Avenue | Beach Cities Advanced Imaging Building | Medical Office (Surgical) | 52,000 | 3 stories |
| 512 North Prospect Avenue | Parking Structure | Parking | 52,000 | 3 stories |
| 514 North Prospect Avenue | Beach Cities Health Center | Community Wellness and Memory Care | 158,000 | 5 stories |
| | Maintenance Building | Maintenance | 3,200 | 1 story |
| 520 North Prospect Avenue | Providence Little Company of Mary Medical Institute Building | Medical Office (Family Medical) | 47,700 | 3 stories |




wood.

**Project Site**

**FIGURE 2-3**

wood.

Existing Campus Uses

FIGURE 2-4

**510 North Prospect Avenue**, known as the Beach Cities Advanced Imaging Building, is developed with a 3-story medical office building on the southern corner of the campus near the intersection of North Prospect Avenue & Diamond Street. The southern face of the building fronts North Prospect Avenue located immediately to the south. The Beach Cities Advanced Imaging Building is owned by BCHD and includes BCHD's medical diagnostic imaging center. Individual space within the building is also leased to various other tenants as described in Section 2.3, *Existing Tenants*.

**512 North Prospect Avenue** is developed with a concrete and brick above-ground parking structure that primarily serves the Beach Cities Advanced Imaging Building at 510 North Prospect Avenue. The parking structure has 2 above ground levels with additional uncovered parking on the roof (i.e., Level 3). The parking structure contains approximately 199 parking spaces (including 2 accessible parking spaces).

*The Beach Cities Advanced Imaging Building (left) located at 510 North Prospect Avenue fronts North Prospect Avenue immediately north of its intersection with Diamond Street. The existing parking structure (right) is located immediately adjacent to the Beach Cities Advanced Imagine Building and is accessed via the driveway off of North Prospect Avenue.*

**514 North Prospect Avenue** is the former South Bay Hospital Building, currently operated as the Beach Cities Health Center, located in the center of the campus. There are three sections of the building: the north low rise, the north tower, and the south tower. The north low rise portion of the building is 1 story tall, the north tower is 4 stories tall (plus the equivalent of a 2-story rooftop projection), and the south tower is 5 stories tall (plus the equivalent of a 1-story rooftop projection), with a parapet structure (i.e., elevator shaft) reaching up to a height of 76 feet above the campus ground level and 112.5 feet above the vacant Flagler Lot below.

The building is bordered by landscaping, such as manicured grasses, palm trees, and large ferns. A 120-foot-long outdoor covered walkway connects the north low rise section of the Beach Cities Health Center to the attached maintenance building, which houses mechanical equipment for the Beach Cities Health Center.

BCHD's Community Services program is located within the Beach Cities Health Center, with a front desk for walk-ins, office space for Care Managers, and meeting rooms for juvenile diversion meetings and core support groups (see Section 2.2.5, *Existing BCHD Programs*). The Beach Cities Health Center includes the Silverado Beach Cities Memory Care Community with 60 double occupancy Memory Care units. Silverado provides specialized care for people living with Alzheimer's and other forms of dementia. BCHD's existing CHF is also located within the Beach Cities Health Center building (see Section 2.2.5, *Existing BCHD Programs*).

*The Beach Cities Health Center is divided into four separate segments that have been added on over the years. The Beach Cities Health Center is supported by the attached maintenance building.*

**520 North Prospect Avenue** is developed with a 3-story family medical office and urgent care center located immediately south of the Redondo Village Shopping Center and west of the Beach Cities Health Center. This building is owned by BCHD and is leased to the Providence Little Company of Mary Medical Institute. The Providence Little Company of Mary Medical Institute Building provides a variety of services, including family practice, internal medicine, and endocrinologists. The urgent care offers a variety of services, including immunizations and vaccinations, lab services (e.g., X-rays and EKGs), physicals (e.g., annuals, sports, school, camp), pre-employment exams, drug screenings, and well-woman exams. The building also includes an on-site pharmacy (i.e., South Bay Pharmacy). The area adjacent to the building is improved with

*The Providence Little Company of Mary Medical Institute, which is owned by BCHD, is located immediately west of the Beach Cities Health Center at the northwestern corner of the Campus.*

a 62-space surface parking lot fronting North Prospect Avenue and an approximately 219-space subterranean parking garage below the building. The entrance to the subterranean parking garage is located adjacent and west of the main signalized entrance to the campus off of North Prospect Avenue and associated roundabout (see Section 2.2.4, *Existing Access and Circulation*).

**Flagler Lot.** Flagler Lot, currently owned by BCHD, is attached to the northeastern corner of the campus. The lot was historically within the Torrance Oil Field and is underlaid by an oil and gas well, which was originally drilled in the 1930s and was active up to 1989 before it was plugged and abandoned (Converse Consultants 2020; see Section 3.8, *Hazards and Hazardous Materials*). The lot is accessible via a driveway along Beryl Street as well as a locked gate at the corner of the campus's northern parking lot. Flagler Lot is currently undeveloped and supports low-growing weedy vegetation. The northern portion of the lot is level with Beryl Street, while the southern portion of the lot slopes up approximately 30 feet to the elevation of the campus. A wrought iron fence is located along the western, northern, and eastern borders of Flagler Lot.

*Flagler Lot is separated from the adjacent parking lot for the Redondo Village Shopping Center by a wrought iron fence.*

### 2.2.4 Existing Access and Circulation

#### 2.2.4.1 Street Network

Current access to the campus is provided from North Prospect Avenue at three locations, as described below:

- The main entrance to the campus is located at a signalized driveway intersection with North Prospect Avenue, approximately 275 feet to the northwest of the intersection of North Prospect Avenue & Diamond Street. This primary entrance provides full left- and right-turn access (refer to Figure 2-3);
- A secondary driveway is located approximately 100 feet northwest of the intersection of North Prospect Avenue & Diamond Street. This secondary entrance is unsignalized, and provides right-turn-only entry/exit to the southern portion of the campus (refer to Figure 2-3); and

- Another secondary driveway is located approximately 450 feet northwest of the main entrance along North Prospect Avenue. This secondary entrance is unsignalized and provides right-turn-only entry/exit to the northern portion of the campus (refer to Figure 2-3).

*The main entrance to the campus (left) is located at a signalized intersection that provides for left and right turns into the campus. Secondary access to the Project site includes two driveways to the north (middle) and south (right) of the main entrance. These unsignalized driveways provide for right-turn-only entry/exit. These driveways also provide access to the perimeter circulation road that follows along the edge of the campus and the surface parking lots in the northwestern corner of the Project site.*

The main entrance to the campus routes vehicles through a roundabout leading to the short-term surface parking lot and drop-off area as well as the entrance to the subterranean parking garage. The secondary driveways provide access to a 30-foot-wide perimeter circulation road that runs along the northwest, north, and east borders of the campus and provides access to surface parking spaces distributed throughout the campus (refer to Figure 2-3). Additionally, the vacant Flagler Lot is accessible via a driveway along Beryl Street as well as a locked gate at the corner of the campus's northern parking lot.

#### 2.2.4.2 Transit

The Project site is currently served by one transit line: Beach Cities Transit Line 102 (Beach Cities Transit 2018). The northbound Line 102 has three bus stops adjacent to the Project site – one stop at the campus's southern secondary vehicle entrance (approximately 100 feet north of the intersection of North Prospect Avenue & Diamond Street), and two stops along the southern side of Beryl Street, at the Shell gas station and just west of the vacant

*The Beach Cities Transit Line 102 stops at two locations along Beryl Street, including next to the Shell gas station immediately north of the Project site.*

Flagler Lot. The southbound Line 102 has two bus stops adjacent to the Project site – one bus stop along the western side of North Prospect Avenue, directly across the street from the campus's main entrance, and one stop along the northern side of Beryl Street, directly across the street from the vacant Flagler Lot. Line 102 headways vary between 30 and 45 minutes. The Project site is not served by any Torrance Transit lines. The nearest Torrance Transit line, Line 2, runs along Anza Avenue approximately 0.80 miles east of the campus.

#### 2.2.4.3 Bicycle and Pedestrian Facilities

No developed bicycle paths or striped bicycle lanes currently exist along the streets bordering the Project site; however, Flagler Alley, which is blocked to vehicle traffic, provides an informal pathway used by bicyclists. The nearest Class II (i.e., striped) bicycle lanes are located along Beryl Street east of its intersection with Flagler Lane and along Diamond Street, southwest of its intersection with North Prospect Avenue. These segmented bicycle lanes provide incomplete connections between ~~the~~ Redondo Beach, Torrance, and the Pacific Ocean.

*Flagler Alley (left) provides an informal bicycle path along the eastern border of the Project site since it is blocked off to vehicle traffic. Due to the sparse bicycle lanes in the vicinity of the Project site, some bicyclists ride along the sidewalks (right).*

Sidewalks currently exist along the Project site's frontage with North Prospect Avenue and along Beryl Street. Additionally, sidewalks occur along the eastern side of Flagler Lane and Diamond Street, with Flagler Alley providing an informal pedestrian connection between the two roadways. Crosswalks are provided along all four legs of the intersection of Beryl Street and North Prospect Avenue and along three legs of the intersection of Beryl Street and Flagler Lane. Additionally, there is a crosswalk located in the middle of this roadway segment at the driveway entrance to the Redondo Village Shopping Center.

### 2.2.5 Existing Land Use Designations and Zoning

The campus, which is located within Redondo Beach, is designated P (Public or Institutional) land use within the Redondo Beach General Plan (City of Redondo Beach 2008; see Section 3.10, *Land Use and Planning*). The P designation includes lands that are owned by public agencies, special use districts, and public utilities. Permitted uses under the P land use designation include governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (i.e., schools), cultural (e.g., libraries, museums, performing and visual arts, etc.), human health, human services, public utility easements, and other public uses. The campus is zoned Community Facility (P-CF) under the Redondo Beach Zoning Ordinance (City of Redondo Beach 2011; see Section 3.10, *Land Use and Planning*). The vacant Flagler Lot is designated as C-2 (Commercial) land use under the Redondo Beach General Plan and zoned C-2 (Commercial) under the Redondo Beach Zoning Ordinance (City of Redondo Beach 2008, 2011; see Section 3.10, *Land Use and Planning*).

*The vacant Flagler Lot, located west of the Redondo Village Shopping Center and north of the northernmost surface parking lot on the campus, is designated C-2 (Commercial) land use, which differs from the P (Public or Institutional) land use designation of the campus.*

Redondo Beach Municipal Code (RBMC) Section 10-2.622 includes maximum height limits along with other development standards for the C-2 zone designation that governs the vacant Flagler Lot. Development standards in the C-2 zone allow for a baseline maximum building height of 30 feet. Development standards in the C-2 zone also require that the maximum density or intensity of development adheres to a Floor Area Ratio (FAR) of 0.5. As described further in Section 3.10, *Land Use and Planning* the proposed development within the C-2 zone has been designed to meet these requirements. The RBMC does not specify building heights or FARs for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116).

The eastern portion of the Project site is located within City of Torrance right-of-way along Flagler Lane and Flagler Alley. This area is designated R-LO (Low Density Residential) in the Torrance General Plan Land Use Policy Map (City of Torrance 2005; see Section 3.10, *Land Use and Planning*), which primarily allows for single-family residences together with accessory buildings

such as private garages, children's playhouses, buildings for the housing of domesticated animals, non-commercial greenhouses, and non-commercial workshops. This area is zoned as R1 (Single Family Residential) in the Torrance Property Zoning Map (City of Torrance 2019). The Torrance Zoning Code (Torrance Municipal Code [TMC] Section 91.4.2) establishes a maximum building height in the R-1 zone as 18 feet measured from the lowest portion of the property that is above ground. The Torrance Property Zoning Map also identifies these Flagler Lane and Flagler Alley within the Hillside Overlay, which generally extends along the western border of Torrance.

The Project site is located outside of the Coastal Zone (refer to Figure 2-1), and therefore is not subject to the provisions of the California Coastal Act and the Local Coastal Plan for the City of Redondo Beach or City of Torrance.

### 2.2.6 Existing BCHD Programs

The Beach Cities Health Center supports a wide range of health programs and community service which include Community Services program, CHF, and various partnership programs. Partnership programs include group meetings, a variety of public health classes (e.g., caregiver support, meditation), and Blue Zones Moais (i.e., social support groups that form in order to provide varying support from social, financial, health, or spiritual interests). Most of these programs involve smaller meetings (between 10 and 15 people); however, some (e.g., BCHD Partnership for Youth) can be up to 80 to 100 people.

#### 2.2.6.1 Community Services

The Community Services program is located in the Beach Cites Health Center and provides health-related resources and information for adults and families within the South Bay and Greater Los Angeles area. The Community Services office includes a front desk for walk-ins, administrative space for approximately 10 to 15 Community Services staff, and meeting rooms. The Community Services staff primarily conduct home visits to provide at-home older adult care services which facilitate older residents remaining within their homes, with staff returning to the office intermittently throughout the day. The front desk staff provide campus wayfinding, information, and referrals. The Community Services program also offers health insurance enrollments and Healthy Minds mental health screenings (with appointments generally between 9:00 a.m. and 4:00 p.m.). The Community Service meeting rooms are generally used for:

- Internal Services (all day);
- Juvenile Diversion Meetings (generally after school between 2:00 p.m. and 7:00 p.m.); and
- Core Support Groups (e.g., which generally meets at 9:30 a.m. and 1:30 p.m.).

The Community Services program operates between 9:00 a.m. and 5:00 p.m. on Mondays through Fridays and is closed on the weekends.

The Community Services program is working with the Los Angeles County Department of Public Health, City of Redondo Beach, and Providence Little Company of Mary Medical Institute to support COVID-19 testing efforts. BCHD currently provides up to 500 free COVID-19 tests per day in the northernmost surface parking lot on the campus. This testing program is available to all area residents from cities throughout the South Bay that seek it. BCHD ~~is~~ also ~~investigating potential opportunities to~~ administering vaccines to the surrounding community.

2.2.6.2 Center for Health and Fitness

The CHF, which is located in the Beach Cities Health Center, provides programs and services, such as yoga and pilates classes, group exercise, personal and small group training, and weight management and nutrition expertise. The CHF also provides programs designed specifically for the needs of older adults, including senior fitness, senior yoga and pilates, and SilverSneakers and Silver & Fit memberships. The CHF is a medically-certified facility with trained medical exercise specialists to assist those with particular needs. The CHF generates the highest visitation and parking demand of all of the BCHD's programs and other tenants, with peak visitation generally occurring between 8:00 a.m. and 12:30 p.m., particularly on Mondays, Tuesdays, and Fridays. In 2018, average visitation at the CHF was approximately 45 guests per half hour. The two busiest months of the year were February and March. In response to COVID-19 public health guidelines, the CHF is currently operating at limited capacity on the paved outdoor areas on the campus.

2.2.6.3 Beach Cities Child Development Center

The Beach Cities Child Development Center enrolls children 18 months to 6 years at two locations in Redondo Beach: 850 Inglewood Avenue and 514 North Prospect Avenue at the Beach Cities Health Center. The preschool serves the early childhood educational needs of children in Redondo Beach, Hermosa Beach, Manhattan Beach, Torrance, Lawndale, Hawthorne and other South Bay communities. Both preschools include classrooms and outdoor playgrounds, surrounded by trees and grassy areas that provide students outdoor play and adventure time daily. The current tenant operating the Beach Cities Child Development Center has vacated the building due to the ongoing COVID-19 pandemic.

2.2.6.4 Beach Cities Partnership for Youth

BCHD is one of more than 100 local partners in the Beach Cities Partnership for Youth. BCHD partners with the Redondo Beach Unified School District (RBUSD), Hermosa Beach City School

District (HBCSD), and Manhattan Beach Unified School District (MBUSD) to deliver programs that measurably improve the health and well-being of students and families and reduce substance use. While physical health in the Beach Cities continues to improve, there is a growing need in the student population to address mental health and well-being. The Beach Cities Partnership for Youth is comprised of representatives from the following sectors: youth; parents; businesses; media; schools; youth-serving organizations; law enforcement; civic and volunteer groups; health care professionals; State, local, or tribal agencies; other organizations involved in reducing substance abuse; and religious or fraternal organizations.

#### 2.2.6.5 LiveWell Kids

The LiveWell Kids program was originally created in response to a high rate of obesity at the time – 20 percent in 2007 – among elementary school students in Redondo Beach. As part of the LiveWell Kids program, BCHD supports, maintains, and delivers lessons in the gardens of all Redondo Beach elementary schools and Hermosa View Elementary School. Students participate in hands-on gardening lessons about planting, composting, harvesting and mindful eating. These lessons are primarily conducted at the schools; however, BCHD currently maintains an on-site Demonstration Garden in the Beach Cities Health Center as part of the program.

#### 2.2.6.6 Blue Zones Project

The Blue Zones Project by Healthways, in partnership with BCHD, is a community-wide approach to creating healthier and more productive citizens. The Blue Zones Project uses permanent, evidence-based environmental and policy changes to motivate residents to adopt and maintain healthier lifestyles. The Blue Zones Project participates with restaurants and grocery stores throughout the Beach Cities that prepare food in accordance with the Blue Zones Food Guidelines in order to give customers more options to make healthier choices.

## 2.3 EXISTING TENANTS

In addition to the BCHD programs, the campus provides leased space for a variety of other tenants.

Tenants within the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) include private medical practitioners providing the following outpatient medical services:

- Radiology
- Orthopedic
- Obstetrics/Gynecology
- Oncology/Urology
- Hematology/Medical Oncology
- Infertility/Reproductive Endocrinology
- Chiropractic
- Acupuncture/Massage Therapy
- Dermatology
- Internal Medicine/Pulmonary Disease
- Laboratory
- Pain Management
- Oral and Maxillofacial Surgery

Tenants within the Beach Cities Health District (514 North Prospect Avenue) include:

- SSL Landlord, LLC, which operates the Silverado Beach Cities Memory Care Community providing 60 double-occupancy Memory Care units. Silverado provides specialized care for people living with Alzheimer's and other forms of dementia.
- Beach District Survey Center, L.P.
- Regents of the University of California
- California State University Dominguez Hills
- Cancer Care Associates Medical Group, Inc.
- SafetyBeltSafe USA
- Cancer Care Associates Medical Group, Inc.
- Prader-Willi California Foundation
- Lisa Graziano, LMFT
- USRC Redondo, LLC

The Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) provides the following outpatient medical services:

- Physical Therapy
- Urgent Care
- Pharmacy
- Cardiovascular/Diabetes
- Gynecology
- Ophthalmology
- Infectious Diseases
- Cardiology
- Dermatology
- Gastroenterology
- Laboratory
- Neurology

## 2.4 PROJECT OBJECTIVES

CEQA Guidelines Section 15124(b) (14 California Code of Regulations [CCR] Section 15000 *et seq.*) requires the description of the project in the Environmental Impact Report (EIR) to include *"[a] statement of objectives sought by the proposed project."* As further stated in CEQA Guidelines Section 15124(b), a clear statement of objectives will help the lead agency develop a reasonable range of alternatives for consideration in the EIR and aid decision-makers in preparing findings or a statement of overriding considerations, if necessary.

### 2.4.1 BCHD Mission

BCHD is a California Healthcare District focused on serving the Beach Cities, including Redondo Beach, Manhattan Beach, and Hermosa Beach; however, many services are available to the general public and not restricted to residents within the Beach Cities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. BCHD directly serves a population of more than 123,000 people within Redondo Beach, Hermosa Beach and Manhattan Beach, as well as tens of thousands for other South Bay communities.

In 2005, BCHD created a data-driven strategic planning process to prioritize funding and program implementation. The strategic plan calls for a community needs assessment and the cultivation of strategic partnerships to enable BCHD to address critical health needs for its service population. The Strategic Plan established these priorities:

- Provide all residents with enhanced health services of demonstrated effectiveness ranging from prevention and education to intervention.
- Improve the capacity of the BCHD and its partners to assess and respond to individual and environmental factors that affect community health.

- Further BCHD standing as a trusted and valued community health resource.

### 2.4.2 Project Background

As described in Section 2.1, *Introduction* a seismic evaluation was conducted by Nabih Youssef Associates in March 2018. The evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue) and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). These buildings were designed and constructed in conformance with building code requirements at the time of construction; however, the building code requirements have since evolved based on research, best practices, and experience from previous earthquakes. As an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the campus. However, recognizing that the structures pose a potential public safety hazard, the BCHD Board of Directors prioritized elimination of seismic-related hazard.

The Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. However, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. The combined cost of seismic retrofit and renovation would render such a dual undertaking economically infeasible.

The proposed BCHD Healthy Living Campus Master Plan is driven by several needs. The plan was conceived to resolve the potential safety hazard and economic hardship posed by the aging facilities on-campus while also continuing to provide health and wellness services to the community. In addition to these economic drivers, the proposed BCHD Healthy Living Campus Master Plan is driven by programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD's continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions and events)

as well as specialized use spaces (e.g., CHF, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

### 2.4.3 Project Objectives

BCHD developed three major "*Project Pillars*," which were presented to the Board of Directors during a public meeting on June 17, 2020. The Project Objectives are based on these three Project Pillars:

Health

- Build a center of excellence focusing on wellness, prevention, and research.
- Leverage the campus to expand community health programs and services.

Livability

- Focus on emerging technologies, innovation, and accessibility.
- Create an intergenerational hub of well-being, using Blue Zones Project principles.

Community

- Actively engage the community and pursue partnerships.
- Grow a continuum of programs, services, and facilities to help older adults age in their community.

Based on these Project Pillars, BCHD developed six Project Objectives:

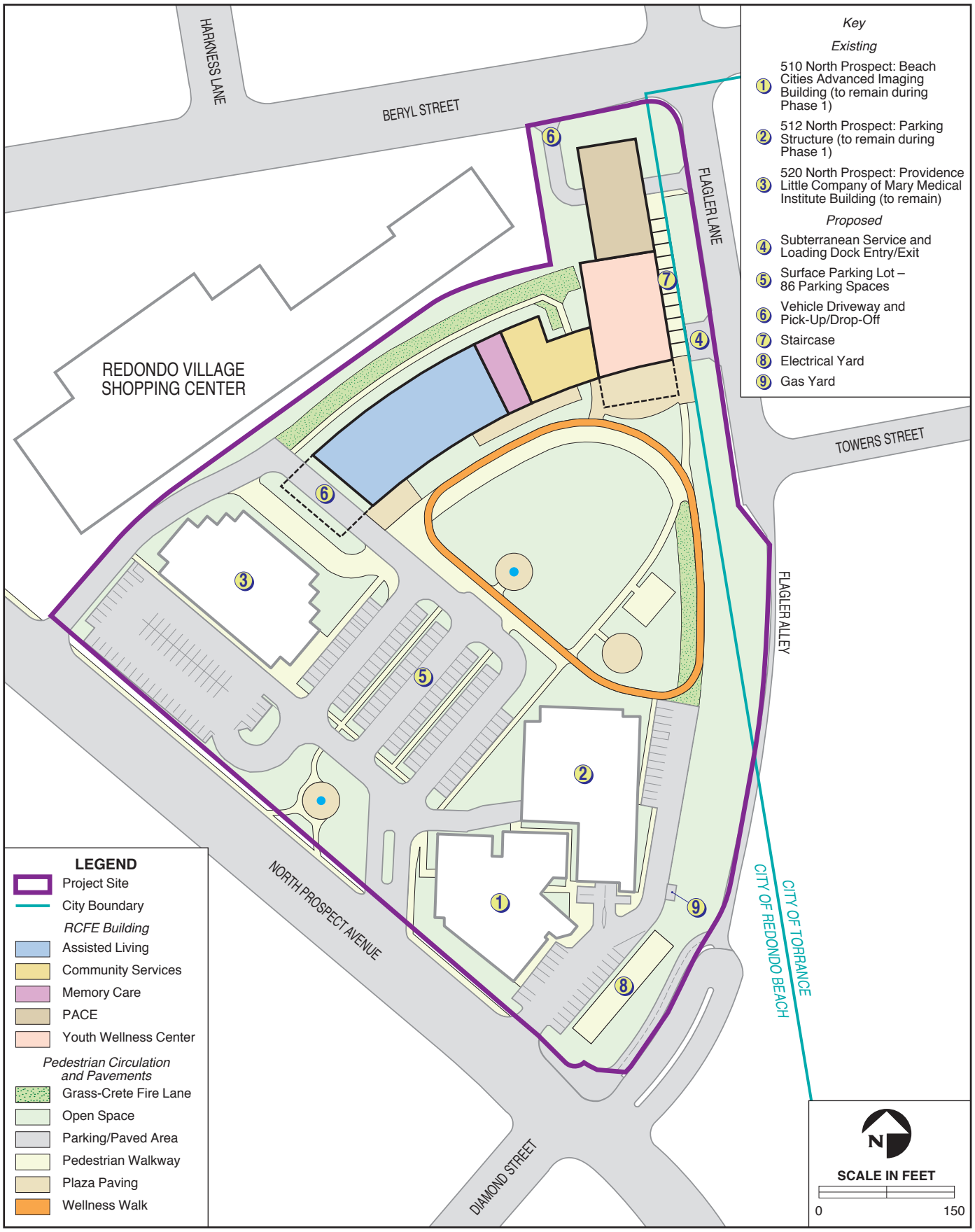
- Eliminate seismic safety and other hazards of the former South Bay Hospital Building (514 North Prospect Avenue).
- Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services.
- Provide sufficient public open space to accommodate programs that meet community health needs.
- Address the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces.
- Redevelop the Project site to create a modern campus with public open space and facilities designed to meet the future health needs of residents, with meeting spaces for public gatherings and interactive education.

- Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs.

The underlying purpose of the proposed BCHD Healthy Living Campus Master Plan is to solve the current seismic issues associated with the former South Bay Hospital Building and establish a center of excellence for community health. Implementation of the proposed Project is intended to meet the six objectives described above and therefore achieve the underlying purpose of the proposed Project.

## 2.5 PROPOSED BCHD HEALTHY LIVING CAMPUS MASTER PLAN

Development under the proposed BCHD Healthy Living Campus Master Plan would occur over two phases, with Phase 1 occurring over 29 months and Phase 2 over 28 months, as described in further detail below. BCHD has developed a detailed preliminary site development plan for Phase 1, which is evaluated in this EIR at a project level of detail. Additionally, BCHD has developed a more general long range development program for Phase 2 based upon the best available planning information. As previously described, this development program has been evaluated programmatically in that construction impacts have been evaluated using a maximum area of disturbance and a maximum duration of construction activities. Operational impacts have also been evaluated programmatically in that the analysis addresses maximum building space allocations.

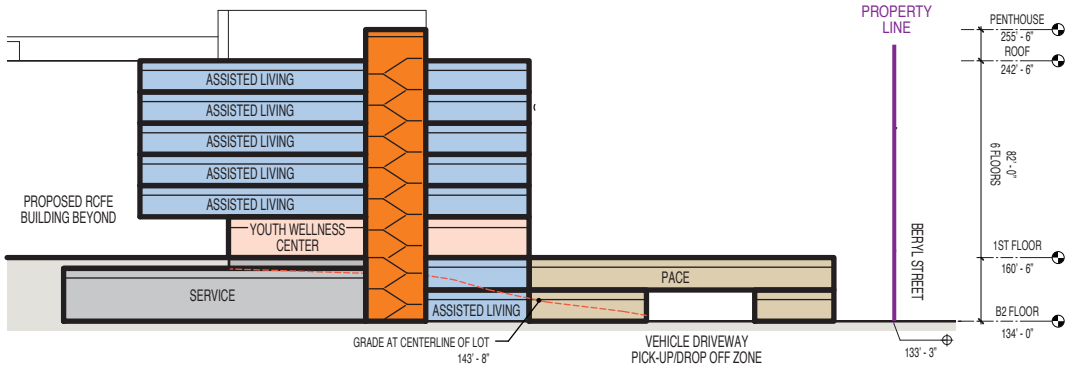



wood.

**Phase 1 –**
**Residential Care for the Elderly Building Floorplan**

**FIGURE 2-5**

## Cross-Section 1
(View from Flagler Lane)

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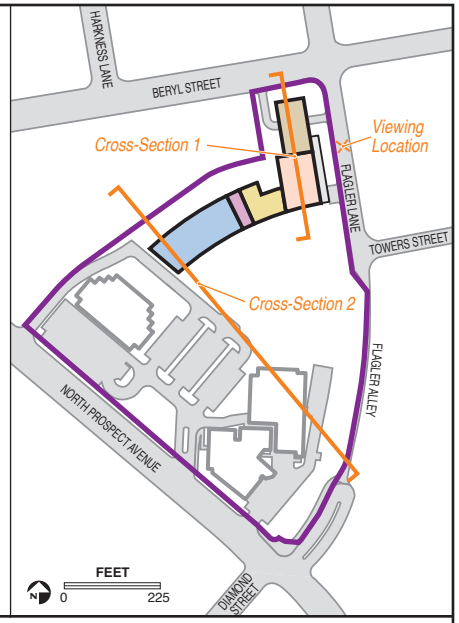
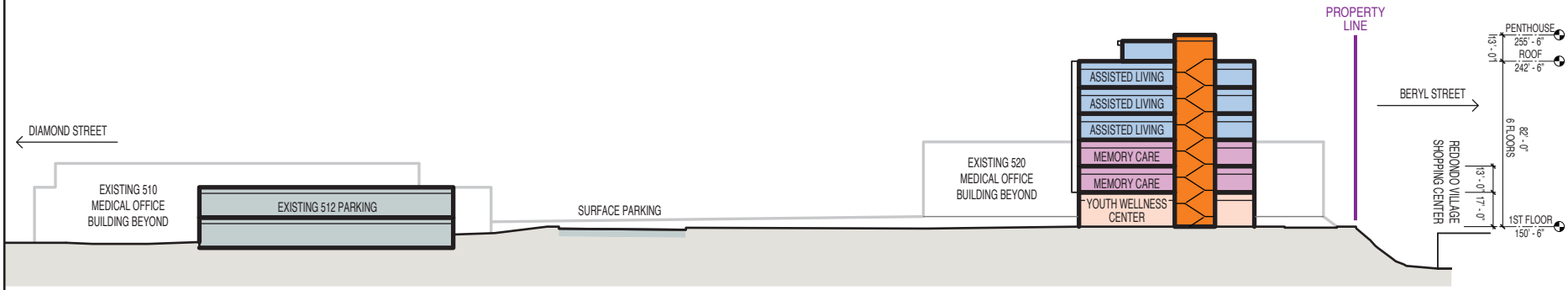



## Cross-Section 2
(View from Flagler Lane)

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**Phase 1 –**
**Residential Care for the Elderly Building Cross-Sections**

**FIGURE 2-6**

### 2.5.1 Phase 1 Preliminary Site Development Plan

Phase 1 of the proposed BCHD Healthy Living Campus Master Plan would include the implementation of a detailed preliminary site development plan involving the proposed construction of the RCFE Building, the demolition of the existing Beach Cities Health Center and the attached maintenance building, and the development of open space and a surface parking lot.

Construction activities under Phase 1 would begin with the demolition of the existing northern surface parking lot and the associated perimeter circulation road located at the northern edge of the Project site. The proposed RCFE Building would be constructed within this footprint, and would include 157 Assisted Living units, 60 Memory Care units (replacing the existing Silverado Beach Cities Memory Care Community located within Beach Cities Health Center), 14,000-sf programmed for PACE, 6,270-sf programmed for Community Services, and a 9,100-sf Youth Wellness Center. The RCFE Building would include a new one-way driveway and pick-up/drop-off zone located on the vacant Flagler Lot as well as a new subterranean service area and loading dock entry/exit. The RCFE Building would reach a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below.

**Table 2-2. Phase 1 Preliminary Site Development Plan**

| Use | Units/Rooms | Floor Area (sf) |
|---|---|---|
| Assisted Living | 157 units | 203,700 |
| Floor B2 | | 5,750 |
| Floor B1 | | 5,750 |
| Floor 1 | | 17,500 |
| Floor 2 | | 16,200 |
| Floor 3 | | 25,300 |
| Floor 4 | | 44,400 |
| Floor 5 | | 44,400 |
| Floor 6 | | 44,400 |
| Memory Care | | 50,000 |
| Floor 1 | | 2,750 |
| Floor 2 | | 28,150 |
| Floor 3 | | 19,100 |
| PACE | | 14,000 |
| Community Services (Floor 1) | | 6,270 |
| Youth Wellness Center (Floor 1) | | 9,100 |
| Parking | 86 new parking spaces (including accessible parking spaces and EV charging stations) | 40,725 |
| Open Space | | 114,830 |

The Beach Cities Health Center would remain in place for the duration of construction of the proposed RCFE Building to allow most of BCHD's existing programs to continue. However, prior to the beginning of construction, the CHF would be relocated to an off-site location. (The CHF would be relocated back to the campus as a part of Phase 2 of development; see Section 2.5.2, *Phase 2 Development Program*). Because the CHF has the largest parking demand of the existing uses at the Beach Cities Health Center**,** the proposed relocation of the CHF would alleviate parking constraints associated with demolition of the northern surface parking lot at the beginning of Phase 1. Additionally, the existing Demonstration Garden would be moved from the campus to a local school campus during the development of the RCFE Building.

Following the construction of the proposed RCFE Building, the Community Services program and 60 Memory Care units and facilities associated with the Silverado Beach Cities Memory Care Community, would be relocated from the Beach Cities Health Center to the RCFE Building. Demolition of the existing 5-story, 158,000-sf Beach Cities Health Center and the attached 3,200-sf maintenance building would occur toward the end of Phase 1 following the relocation of these uses. Following the demolition of the Beach Cities Health Center and the attached maintenance building as well as the demolition and backfilling of the subterranean levels, a 40,725-sf landscaped surface parking lot would be constructed providing 86 new parking spaces (including accessible parking spaces and EV charging stations) (see Section 2.5.1.3, *Proposed Access, Circulation, and Parking*). The existing Beach Cities Advanced Imaging Building (510 North Prospect Avenue), associated parking structure (512 North Prospect Avenue), Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue), and associated surface parking lot and subterranean parking garage would remain in place on the campus (refer to Figure 2-5).

Phase 1 would include landscaping surrounding the RCFE Building as well as a large lawn in the interior of the campus that would serve as an open space for both the campus and the surrounding community. Additionally, a new electric service would be developed in conjunction with Southern California Edison (SCE) – including the development of a new on-site distribution system – that would replace the existing electrical service at the Project site (see Section 2.5.1.4, *Utilities and Services*).

#### 2.5.1.1 Proposed Uses

<u>Assisted Living</u>

The proposed RCFE Building would include an Assisted Living program with 157 private or semi-private apartment-style units. The Assisted Living program would also provide a continuum of

long-term care services including a combination of housing, personal care services, and health care specific to individuals who need assistance with normal daily activities (e.g., meal preparation, medication management, etc.).

The 157 Assisted Living units, which would be operated by a partner company specializing in administering Assisted Living programs, would occupy Floors 1 through 6 of the proposed RCFE Building. These units would consist of 37 studios, 70 one-bedroom units, 30 one-bedroom units with dens, and 20 two-bedroom units (see Table 2-3). The 157 units would serve approximately 177 residents. In addition to the Assisted Living units, approximately 35 percent of the floor area dedicated to Assisted Living would be programmed as non-living space. This would include spaces such as a front lobby and reception area as well as a main kitchen and dining hall (which would double as activity space) on the Floor 1. Smaller kitchen(s) for meal preparation by Assisted Living residents, small cafés and/or private dining rooms would be provided throughout Floors 2 through 6. The Assisted Living space would also include nursing stations, smaller visiting spaces, activity spaces, and laundry facilities on each floor of the building. The precise Assisted Living unit layout and non-living space layout would be developed by BCHD in consultation with the partner company.

**Table 2-3. Assisted Living Apartment Units**

| Use | Units | Floor Area (sf) |
|---|---|---|
| Studio Unit | 37 | 500 |
| Single-Bedroom Unit | 70 | 650 |
| Single-Bedroom + Den Unit | 30 | 750 |
| Two-Bedroom Units | 20 | 925 |

Memory Care

The proposed Project would replace the 60 double-occupancy Memory Care units associated with Silverado Beach Cities Memory Care Community (located within the existing Beach Cities Health Center) within the proposed RCFE Building. As with the existing Silverado Beach Cities Memory Care Community these 60 double-occupancy units would serve a maximum of 120 residents. Each unit would be approximately 425 sf and would include beds, dressers, and other furniture, and attached restrooms. The Memory Care program would include its own lobby and reception area on Floor 1, separate from the lobby and reception area associated with the Assisted Living program. The lobby entrance would front the interior of the campus and would include a front desk, restrooms, guest elevators, and a staircase to the upper floors. The Memory Care program would have similar non-living space requirements as those described for the Assisted Living

program. However, rather than having a main dining hall and activity spaces, each floor of the Memory Care program would be organized as its own neighborhood so that residents would not need to travel between floors. Each floor would provide its own dining hall, visiting rooms, indoor activities spaces, and nursing station.

PACE

PACE is a Medicare and Medicaid program that provides comprehensive medical and social services older adults (i.e., age 55 and older with an average age of 76). PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. For most participants, PACE services would enable them to remain in the community rather than receive care in a nursing home or other elder care facility.

The proposed PACE services would be a new program on the campus. The proposed Project RCFE Building would dedicate approximately 14,000 sf of floor area for PACE, to be developed in consultation with and operated by a partner company specializing in PACE services. Similar to the Assisted Living and Memory Care programs, the floor area for PACE would include a lobby and reception area, food preparation area, and dining hall. The floor area dedicated for PACE would also include a nurse station, examination rooms, a small weight room, assisted changing room, and assisted unisex restrooms. Small and medium size meeting/multi-purpose rooms would be provided in support of PACE. The Care Managers would also have office space with a staff breakroom and restrooms.

This program would implement the drop-off and/or van transportation model, with participants coming in the morning and staying throughout the day. PACE would likely require one or two vans, which may also by shared by the Assisted Living and Memory Care programs. PACE would also make use of Los Angeles County Access and/or WAVE shuttles – to the extent that they are available to residents of the City of Redondo Beach and the City of Hermosa Beach – to provide transportation for participants.

Community Services

The existing Community Services program in the Beach Cities Health Center would be relocated to the proposed RCFE Building following the completion of construction activities. The Community Services program would occupy approximately 6,270 sf of the RCFE Building and would provide all of the same existing social service programs, including food security, housing security, safety in the home, and socialization (refer to Section 2.2.5, *Existing BCHD Programs*). Similar to the existing Community Services space within the Beach Cities Health Center, the new space would include a 1,000-sf lobby and front desk area, 408 sf of administrative offices, and 695 sf of open office area. A staff breakroom and restrooms would also be provided. Community Services would also include two meeting rooms. The proposed meeting rooms would include a 1,000-sf BCHD Board of Directors meeting room with an attached 120-sf storage space and another 670-sf meeting room to accommodate the smaller core support group meetings currently hosted at Beach Cities Health Center (refer to Section 2.2.5, *Existing BCHD Programs*).

Youth Wellness Center

BCHD recently received a grant to design and establish a new Youth Wellness Center to provide young adults (i.e., ages 18-25) with to access social services and life skills, job skills, mental health, sexual health services, etc. The Youth Wellness Center would also provide space for an after-school (e.g., from 2:00 p.m. onward) behavioral and health program for school-aged children (i.e., ages 12-18). The Youth Wellness Center would occupy approximately 9,100 sf in the RCFE Building and would include office space, medium-sized meeting rooms, kitchens, etc. As the Youth Wellness Center is intended for young adults and children, who would walk to, bike to, or be dropped-off at campus.

Open Space

As described in Section 2.2, *Existing Project Site Characteristics*, the Project site is almost completely developed with impervious surfaces associated with existing building footprints and surface parking lots. Open space is generally limited to landscaping bordering the buildings as well as the hillside along the eastern edge of the campus. The proposed Project would substantially expand open space, including 114,830 sf of programmable open space within the interior of the Project site. The central lawn would be sized to accommodate a variety of outdoor community events such as movie nights or group fitness activities (refer to Figure 2-7 and Figure 2-8).

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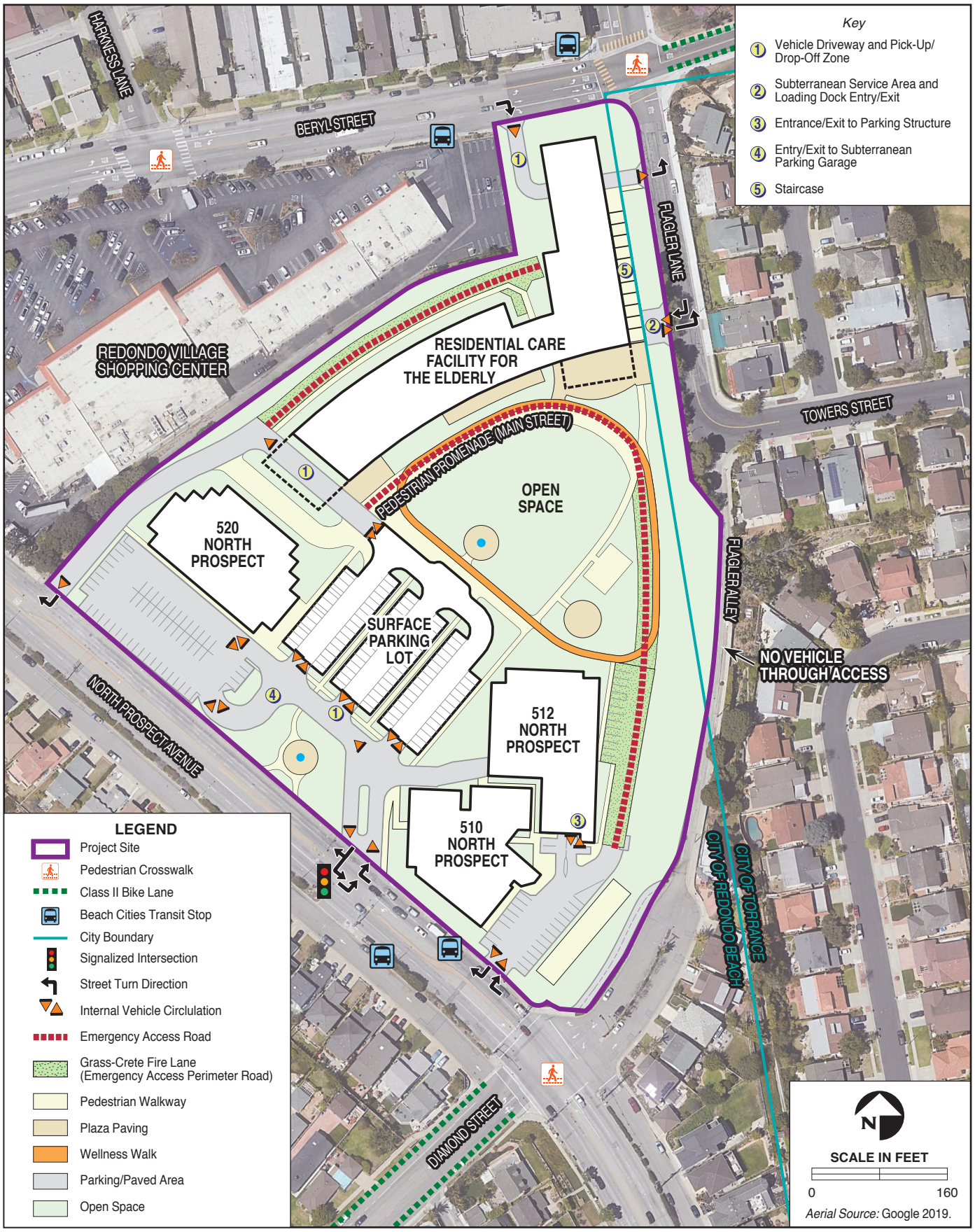
**Phase 1 – Open Space and Landscaping**

**FIGURE 2-7**

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**Phase 1 – Circulation and Access**

**FIGURE 2-8**

A tree-lined pedestrian promenade (also referred to as Main Street) would extend from the entry plaza around the perimeter of the central lawn to the eastern border of the campus. The pedestrian promenade would be 26 feet wide and lined with benches shaded by tree canopies. This promenade could support outdoor farmers' markets and health fair expositions. The pedestrian promenade would overlap with Wellness Walk, a distinct loop with distance markers, signage, and fitness stations.

Perimeter green space and landscaping would be intended to soften the campus interface and provide connections with the surrounding uses. The perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening. Similarly, the campus's northern border would be lined with shade and flowering ornamental trees to screen views from the Redondo Village Shopping Center.

BCHD's existing Demonstration Garden would be upgraded and relocated to the central open space to encourage interactions with campus residents, visitors, and the wider community. The proposed Demonstration Garden would feature demonstration vegetable garden plots, an orchard with citrus and other fruit trees, and a garden shed. Outdoor classroom space and a compost demonstration area would also be provided to support BCHD's LiveWell Kids program (refer to Section 2.2.5, *Existing BCHD Programs*). The Demonstration Garden would be surrounded by 5-foot-tall fencing for security.

#### 2.5.1.2 Project Architecture and Design

The conceptual architectural and landscape plan includes the development of a curved linear, RCFE Building that follows the perimeter of the Project site along and overlooking the adjacent Redondo Village Shopping Center and Beryl Street. As described further in Section 3.1, *Aesthetics and Visual Resources*, the proposed RCFE Building design includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass, and painted privacy sunscreens on white concrete balconies with glass handrails. The ground floor of the RCFE Building would be developed on concrete columns with predominantly glass walls allowing public views of and pedestrian passage to active green spaces located within the central campus area of the Project site.

The proposed RCFE Building would have a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below

(refer to Figure 2-6). The proposed RCFE Building would be subject to ~~Redondo Beach~~ Planning Commission Design Review(s) ~~in compliance with the CF zoning designation for the Project site~~ as established in RBMC Section 10-2.1116 and TMC Section 13.9.7. The first floor of the RCFE Building that would overhang the driveway and pick-up/drop-off zone on the vacant Flagler Lot would not exceed the designated 30-foot maximum height as allowed in C-2 zones by the RBMC Section 10-2.625.

2.5.1.3 Proposed Access, Circulation, and Parking

Project Site Access and Circulation

The primary vehicle entry/exit would continue to be provided from the main entrance and the two secondary entrances along North Prospect Avenue (see Figure 2-8). The central driveway would continue to operate as the main entrance to the Project site and would provide access to the proposed 40,725-sf landscaped surface parking lot as well as a vehicle pick-up/drop-off at the western end of the proposed RCFE Building. The southern driveway to the southeast of the main entrance would continue to provide access to the existing parking structure (512 North Prospect Avenue). However, the existing perimeter road would be converted to a pedestrian promenade and would no longer provide vehicle access around the edge of the campus, except in the case of emergencies.

*The existing subterranean parking garage is accessed from the main entrance off of North Prospect Avenue. This entrance and subterranean parking garage would remain in place under the proposed Project.*

The vacant Flagler Lot would be developed with a new one-way driveway accessible via a right-turn along eastbound Beryl Street (see Figure 2-8). The driveway, which would provide one 12-foot-wide lane and would be approximately 150 feet long, would support a pick-up/drop-off zone for Assisted Living and Memory Care residents as well as PACE participants and other visitors to the campus. However, unlike the entrances from North Prospect Avenue, this driveway would not provide access to long-term parking on the campus and as such, would not be a primary entrance. The driveway would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street.

Additionally, a new service area and loading dock entry/exit would be provided off of Flagler Lane, approximately 150 feet south of Beryl Street This service entrance would be limited to service vehicles and delivery vehicles only and would not be used by staff, residents, participants,

or other visitors to the campus. Service vehicles would enter by taking a right off of Flagler Lane and exit taking a left turn onto northbound Flagler Lane (see Figure 2-8).

Parking

Phase 1 of the proposed Project would develop a 40,725-sf landscaped surface parking lot providing 86 parking spaces (including accessible parking spaces and EV charging stations) within the center of the campus. This parking lot would be accessible via the main vehicle entrance off of North Prospect Avenue (see Figure 2-8). The existing western surface parking lot and subterranean parking garage that front the Providence Little Company of Mary Medical Institute Building would remain in place.

Bicycle and Pedestrian Facilities

Bicycle facilities would also be provided for employees, residents, participants, and other visitors to the campus. Short-term bicycle parking would be provided at the main entrance off of North Prospect Avenue. Bicycle facilities would also include a bicycle repair station and shower and locker facilities.

Pedestrian access to the Project site would be available from North Prospect Avenue, Beryl Street, and Flagler Lane. Internally, the campus would be traversed by a series of publicly accessible pedestrian pathways ranging from 10- to 26-feet-wide. The proposed pedestrian promenade and a series of other pedestrian pathways would connect to one another to provide pedestrian access throughout the Project site. The pathways would provide direct public access to the RCFE Building, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building. A new multi-tiered stairway adjacent to the PACE program would also rise approximately 30 feet from Flagler Lane to provide pedestrian access to the interior of the campus (see Figure 2-11).

Emergency Access

In the event of an emergency on the campus, the Project site could be accessed from the existing driveways along North Prospect Avenue, the proposed one-way vehicle driveway off of Beryl Street, and the proposed service area and loading dock entry/exit off of Flagler Lane. Similar to the existing perimeter road that borders the campus, the proposed 26-foot-wide pedestrian promenade would wrap around the campus and would provide emergency vehicle access. The pedestrian promenade would connect the existing southern and northern driveways and would provide direct access to the southern side of the RCFE Building. Secondary emergency access

would be provided to the north of the RCFE Building using grass-crete (i.e., permeable pavers with space for grass to grow).

Prior to operation, BCHD would coordinate with the Redondo Beach Fire Department (RBFD) and the Redondo Beach Police Department (RBPD) as well as the Torrance Fire Department (TFD) and Torrance Police Department (TPD) to prepare an Emergency Response Plan for the campus. Additionally, BCHD would utilize training procedures and an operational handbook that contains processes and procedures for BCHD staff to provide the first responder services (see Section 3.13, *Public Services*).

#### 2.5.1.4 Utilities and Services

Existing electrical, natural gas, water, and sewer utilities that serve the site are located within the existing City of Redondo Beach right-of-way along North Prospect Avenue and Beryl Street (see Section 3.15, *Utilities and Service Systems*). These existing utilities would continue to be used for each of the new buildings constructed or modified as a part of the proposed Project. The proposed facilities would be tied into the existing points of connection in North Prospect Avenue and Beryl Street and it is unlikely that any substantial utility upsizing would be required. However, off-site trenching associated with the utility tie-ins would involve re-paving of the roadway as well as the reconstruction of sidewalks, curb and gutter, and landscaping as necessary.

A new electric service would be developed in conjunction with SCE – including the development of a new underground on-site distribution system – that would replace the existing electrical service for the Project site. The proposed Project design for the electrical distribution system includes a SCE Substation Yard, medium voltage distribution system, and generator yard, which would be located along the ~~eastern perimeter~~ southern end of the Project site (refer to Figure 2-5 and Figure 2-7). Views of this utility area would be screened from residences to the east and south by large shade trees.

Water would be supplied by California Water Service from the existing 8-inch water main in North Prospect Avenue. The proposed Project would connect to California Water Service's water supply system with new laterals installed within the Project site. The proposed fire suppression water system would be served by the existing 8-inch fire serves located at the northwest corner and southwest corner of the Project site. The existing campus has five on-site fire hydrants and two off-site fire hydrants located on the east side of North Prospect Avenue that could serve the Project site.

Sewer service would be provided by the existing 8-inch sewer main located at the intersection of North Prospect Avenue & Diamond Street. Wastewater from the RCFE Building would be directed to the 8-inch gravity main along Beryl Street. The proposed Project would connect to this system through the construction of 8-inch sewer lines on the Project site.

Solid waste hauling services would also be provided by Athens Services. Trash and recycling collection facilities for residents, employees, and visitors would be provided within enclosures in the subterranean service and delivery zone. Trash trucks would access the Project site via the proposed service area and loading dock entry/exit along Flagler Lane.

#### 2.5.1.5 Sustainability Features

As required by the RBMC and TMC, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed RCFE Building would optimize passive design strategies, which use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

- Photovoltaic solar panels occupying approximately 25-50 percent of the roof area;
- Solar hot water system to reduce energy use;
- Energy efficient heating, ventilation, and air conditioning (HVAC) systems;
- Operable windows for natural ventilation;
- High-performance building envelope – including thermal insulation;
- Controlled natural lighting and lighting systems designed with occupancy sensors and dimmers to minimize energy use;
- Water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.); and
- Interior materials with low volatile organic compound (VOC) content;
- Plant palette comprised of species adapted to the climate of Southern California;
- High efficiency irrigation system; and
- Pervious paving to promote on-site stormwater infiltration.

The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; EV charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. The proposed Project would also implement a Transportation Demand Management (TDM) plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site and overall traffic on the surrounding street network.

The TDM plan would include transit and carpool incentives for employees (see Section 3.14, *Transportation*).

The proposed Project would also implement a program to encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) or multi-modal transportation. BCHD would provide incentives to guests and employees for hybrid and/or electric car parking and provide a bicycle sharing program for access to the adjacent bicycle paths. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus.

The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification. LEED is a national certification system developed by the U.S. Green Building Council (USGBC) to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. The program promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

The proposed new buildings would also be WELL Building Certified. The WELL Building Standard is the premier standard for buildings, interior spaces and communities seeking to implement, validate and measure features that support and advance human health and wellness. WELL was developed by integrating scientific and medical research and literature on environmental health, behavioral factors, health outcomes and demographic risk factors that affect health with leading practices in building design, construction, and management.

#### 2.5.1.6 Construction Activities

Construction activities associated with Phase 1 of the BCHD Healthy Living Campus Master Plan would occur over a period of 29 months, including the demolition of the existing northern surface parking lot, the proposed construction of the RCFE Building, the demolition of the existing Beach Cities Health Center and the attached maintenance building, and the development of open space and a surface parking lot.

The development application associated with Phase 1 of the proposed BCHD Healthy Living Campus Master Plan would include a comprehensive Construction Management Plan, to be submitted for review and approval by the Redondo Beach and Torrance Building & Safety

Divisions, prior to the issuance of demolition, grading, or building permits. At a minimum, the phased Construction Management Plan would describe:

- Detailed construction schedule and timing of activities;
- Designated construction entrance(s) at the Project site;
- Temporary improvements (e.g., re-striping, etc.);
- Haul routes and queuing areas to be used during demolition, soil excavation and export, materials delivery, concrete truck deliveries;
- City-approved plans for re-routing vehicles, bicyclists, and pedestrians as well as required signage and/or construction flaggers;
- Construction equipment and materials laydown area(s) and other staging area(s); and,
- On- and/or off-site construction worker parking area(s).

BCHD has prepared a preliminary Construction Management Plan summarized below; however, as is typical for major construction projects, some details regarding construction activities for the proposed Project are not yet finalized and/or approved by the City of Redondo Beach and the City of Torrance (see Section 3.14, *Transportation*).

Construction Hours

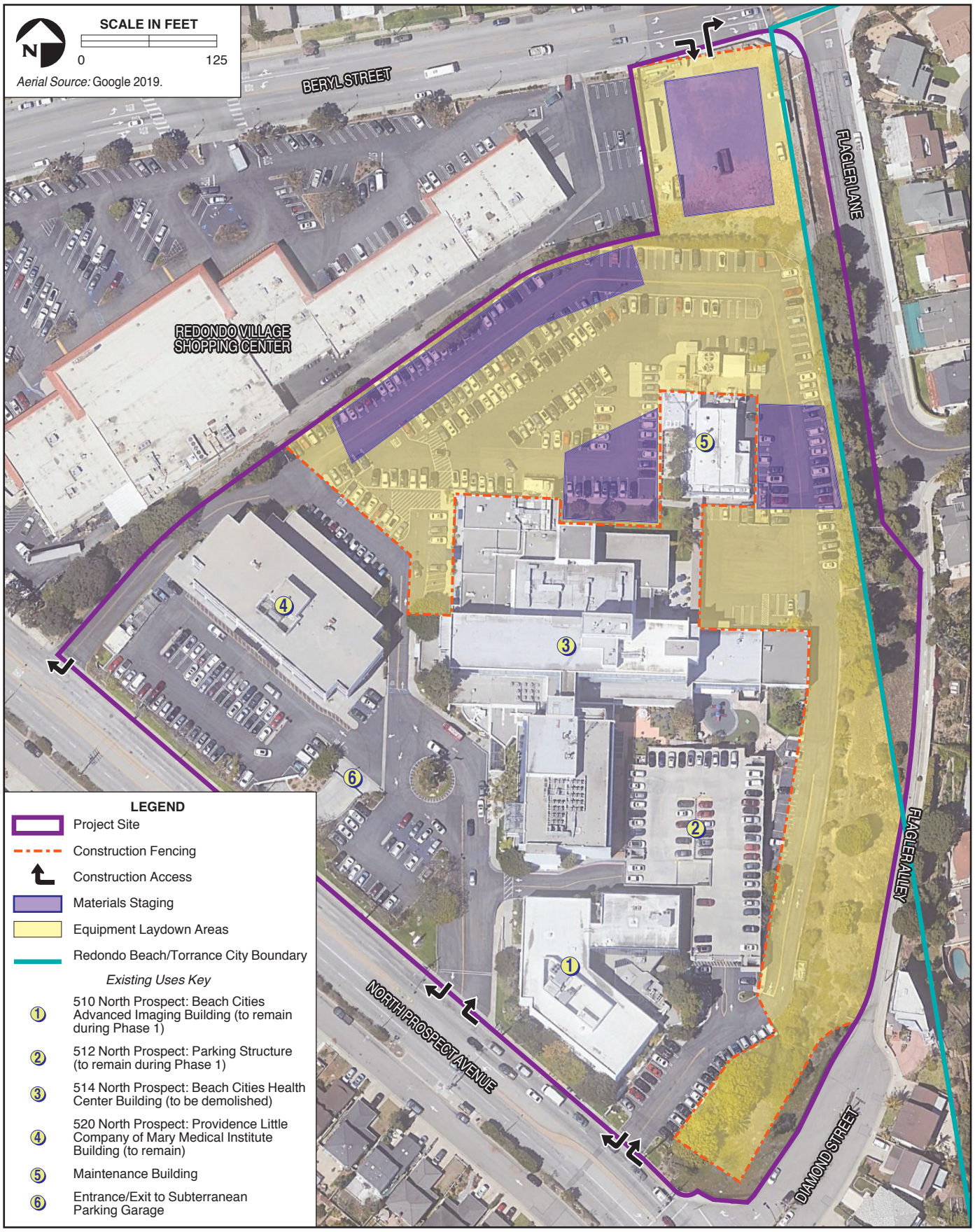
BCHD has proposed the following construction hours for the proposed Project, consistent with RBMC Section 4-24.503 and TMC Section 6-46.3.1:

- 7:30 a.m. to 6:00 p.m. Monday through Friday; and
- 9:00 a.m. to 5:00 p.m. Saturday.

Construction Staging and Haul Routes

All construction activities would be staged within secured construction areas within or adjacent to the Project site. The primary construction staging areas for equipment and materials would be the vacant Flagler Lot and the existing northern surface parking lot. However, the staging areas would likely move between construction phases depending on the area available.

Construction trucks would access the site from one of the existing driveways along North Prospect Avenue. Consistent with the CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element ~~Haul~~ haul trucks would exit the Interstate (I-) 405 freeway on 190th Street or Hawthorne Avenue to 190th Street and reach the site using Del Amo Street to North Prospect Avenue. Construction entry to the Project site would be provided along North Prospect Avenue where construction flaggers would be stationed to direct construction traffic and maintain public safety.




wood.

**Phase 1 – Construction Access and Staging**

**FIGURE 2-9**

wood.

Construction Haul Routes

FIGURE 2-10

Additionally, emergency services vehicle access points would be maintained at North Prospect Avenue and Beryl Street. Fire lanes would be maintained at all times during construction work. The ~~RBPD and RBFD~~RBFD, RBPD, TFD, and TPD would also have access to the Project site 24 hours per day via fence-mounted lockboxes to open gates securing the Project site.

Excavation and Grading

Phase 1 asphalt demolition, excavation, grading, and utility work would occur over a 2-month period beginning with the demolition and removal of the existing northern surface parking lot and associated perimeter circulation road located at the northern edge of the Project site. Subsequent construction of the proposed RCFE Building would begin with a 26-foot-deep excavation for the subterranean service area and loading dock. This excavation work would require temporary shoring involving the use of auger drilled steel soldier piles (i.e., large plates of steel retaining structures) installed into the ground followed by the installation of wood lagging to support the sidewalls of the excavation as it progresses. The foundation of the proposed RCFE Building has not yet been designed but would likely consist of large concrete mat foundations. Driven or drilled foundation piles would not be required based on the preliminary geology and soils analysis (see Section 3.6, *Geology and Soils*). Grading across the remainder of the Project site would be limited to the redistribution of soils on-site to level the central area of the campus. Utility realignments and associated trenching would also occur during excavation of the subterranean building level and service area and loading dock.

Asphalt would be exported from the Project site in approximately 575 haul truck trips. Although excavated soil would be re-used on-site to the maximum extent feasible (i.e., raising grade elevation, backfilling retaining walls, etc.), export of substantial amounts of fill would likely also be required. There is also the potential requirement for hazardous soils remediation during excavation and grading for Phase 1 development (see Section 3.8, *Hazards and Hazardous Materials*). An estimated 20,000 cubic yards (cy) of soil would be excavated and exported from the Project site involving up to 1,250 haul truck trips over a 1-month period. This average soil export rate may be increased or decreased depending on availability of haul trucks during the construction period as well as the rate of shoring installation. Excavation and hauling of earth would comply with South Coast Air Quality Management District (SCAQMD) rules for the control of hauling impacts, including dust and diesel emissions.

Excavation and utility work would be performed using the following equipment:

- Track-crane-mounted vertical drilling rig;
- Track-mounted auger rig for tiebacks;

- Medium-sized track bulldozer;
- All-terrain rubber tire forklift;
- Small rubber-tire backhoes;
- Rubber-tire front-end loader;
- Track-mounted excavators;
- Dump trucks;
- Concrete truck/grout pump for soldier piles, caissons, and tiebacks;
- Rubber-tire rough-terrain hydraulic crane; and
- Miscellaneous small tools, compressors, mixers, generators, portable welding machines, and light duty pickup trucks.

Construction

Phase 1 would include the construction of the proposed RCFE Building, which would involve 292,170 sf of development. Building construction is estimated to require approximately 24 months, including the following overlapping construction elements:

- Exterior hardscape improvements would be constructed over a 7-month period and would involve 600 cy of concrete delivered to the Project site in 75 concrete truck trips.
- The mat foundation and concrete structure would be constructed over a 5-month period and would involve 9,300 cy of concrete delivered to the Project site in 1,162 concrete truck trips.
- Wood framing would be constructed over a 6-month period.
- Exterior sheathing and roofing would be constructed over a 9-month period.
- Mechanical, electrical, and plumbing work would be completed over an 8-month period.
- Interior and exterior building finishes would be completed over a 9-months period.

All construction activities would be staged within secured construction areas on-site. However, these staging areas would be moved depending on the specific construction activities. Construction activities may require use of the following types of equipment:

- Tower cranes;
- Rubber-tired hydraulic cranes as required for specific lifts;
- All-terrain rubber-tired forklift and material-handling equipment;
- Bulldozer;
- Front-end loader;
- Concrete trucks and hydraulic boom pumps during foundation construction;
- Haul trucks for material deliveries (daily);

- Office trailers and storage containers;
- Light trucks; and
- Miscellaneous small tools, compressors, mixers, generators, and portable welding machines.

Demolition

Following the construction of the RCFE Building, relocation of existing uses from the Beach Cities Health Center would occur over a 1-month period. The existing 158,000-sf Beach Cities Health Center would subsequently be demolished toward the end of Phase 1 of construction. Demolition activities would generate approximately 32,000 cy of demolition debris – including structural steel, wood, glass, flooring, and utility material such as pipes and cables – which would be exported from the Project site in approximately 2,000 haul truck trips. Following the completion of demolition activities, the existing basement would be filled with approximately 14,000 cy of soil imported to the Project site in 875 haul truck trips over a period of 1 month.

Demolition would require the use of typical construction equipment, including an excavator, bulldozers, backhoes, and excavators to break up and remove existing asphalt, concrete, and building materials. A high-reach excavator would be used along with a variety of attachments (e.g., shears, crushers, and hydraulic hammers) to dismantle the structure to avoid flying debris and minimize dust and noise. Haul trucks would be used to export large amounts of debris to a mixed construction and demolition debris recycling facility approved by the City of Redondo Beach pursuant to a Construction & Demolition Waste Management Plan. Where needed, any existing hazardous materials found during the demolished buildings (i.e., asbestos, lead-based paints, or soil contamination; see Section 3.8, *Hazards and Hazardous Materials*) would be properly handled and disposed of in accordance with regulatory requirements.

### 2.5.2 Phase 2 Development Program

As previously described, the long range development program under Phase 2 would include the development of space for a Wellness Pavilion, an Aquatics Center, and a new CHF, which would be relocated back on-campus. Additionally, Phase 2 would include the construction of a parking structure with up to 2 subterranean levels and up to 8.5 above ground levels. However, the ultimate location and size of the facilities necessary to support these uses have not yet been finalized. Due to uncertainties in future health and wellness programming, trade-offs associated with site planning and design (see Table 2-4), and financing considerations, Phase 2 can only be programmatically described at this time. It is anticipated that final selection of a detailed site development plan for Phase 2 would be based on the considerations discussed in Section 2.5.2.2, *Physical Design*

*Considerations and Priority-based Budgeting*, but would not occur until after the completion of Phase 1. Final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As described in Section 2.5.2.4, *Construction Activities* construction associated with Phase 2 would last for a period of 28 months.

#### 2.5.2.1 Proposed Uses

Wellness Pavilion

The Phase 2 development program would include up to 37,150-sf of space for a proposed Wellness Pavilion. The proposed Wellness Pavilion would provide office and administrative space for BCHD executive, finance, and human resources staff, which currently work off-site at 1200 Del Amo Office. Additionally, the proposed Wellness Pavilion would include a presentation hall with space with partitions to divide the space into smaller units. Flexible community meeting rooms would be provided and would serve as lecture and media rooms for support ground and educational groups. Research space would be provided to support quiet learning. The Wellness Pavilion would also include a Blue Zone café with a Demonstration Kitchen for healthy cooking classes.

Aquatics Center

Up to 31,300-sf of space would be provided for a proposed Aquatics Center within 24,000 sf of indoor areas and 7,300 sf of outdoor areas. The proposed Aquatics Center would include pools, dressing rooms with lockers, restrooms, and showers, and small meeting/multi-purpose rooms that could serve as party rooms (e.g., birthday parties). The indoor portion of the Aquatics Center could feature a leisure pool for adult and child swimming lessons, water aerobics classes, etc. The Aquatic Center could also include an indoor heated therapy pool that could be used by CHF members and could support programming for PACE participants and Assisted Living (e.g., aquatic aerobics). The outdoor portion of the Aquatics Center could include an outdoor pool that would be designed for fitness activities such as lap swimming, aquatic fitness classes, but could also provide other play features (e.g., slide, river current, vortex, splash pad, etc.).

Center for Health and Fitness

Phase 2 would relocate the CHF back onto the campus into a new 20,000-sf space, which would provide the same community fitness classes as the existing CHF, including yoga, pilates, personal and small group training, aerobics, circuit training, bootcamp, and older adult (i.e., age 65 and older) classes. As described for the Aquatics Center, the CHF would include programming for Assisted Living and Memory Care residents as well as PACE participants.

The new CHF would include a reception lobby with a seating area for guests to check-in and sign-up for the community gym. The community gym area would be comprised of distinctive areas for free weights and weight machines, treadmills, elliptical machines, stationary bikes, upright/recumbent steppers, other machines, and stretching. Outside of the community gym area, separate group exercise areas would be provided, including a cycling studio and a separate fitness room for yoga, pilates, and other group fitness classes.

The proposed CHF would incorporate use of the open space developed under Phase 1. For example, outdoor activities could include a Free Fitness Program (e.g., outdoor Zumba classes for up to 200 people).

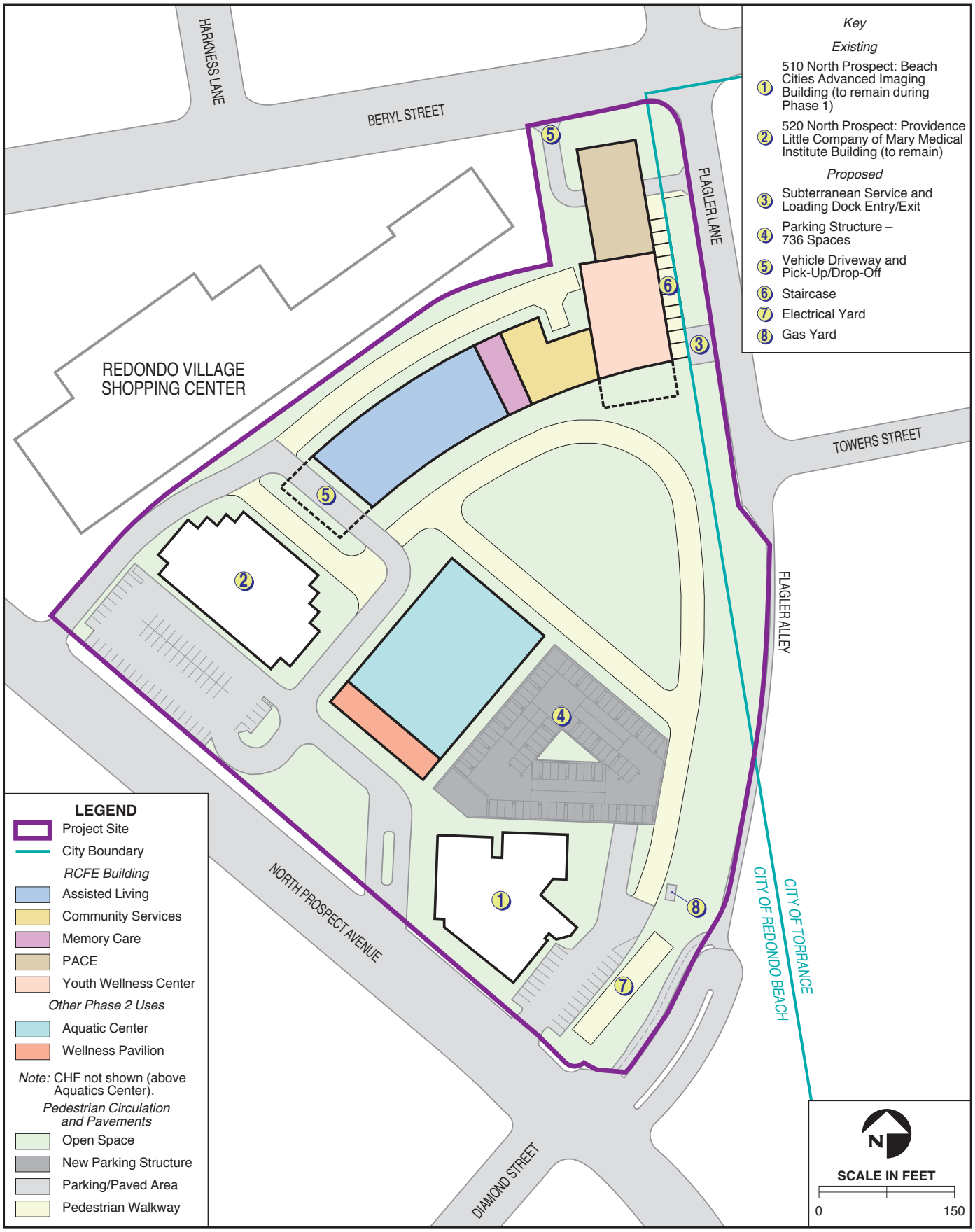
Parking Structure

Phase 2 would involve construction of a parking structure including up to 292,500-sf of parking providing up to 736 parking spaces (including accessible parking spaces and EV charging stations). The need for this new parking structure would be driven by the addition of the Aquatics Center and the relocation of the CHF back onto the campus. Access to this new parking structure would be provided off of North Prospect Avenue.

#### 2.5.2.2 Physical Design Considerations and Priority-based Budgeting

The ultimate design and location of these uses on the campus would be subject to refinement based on the following considerations:

- Bulk, scale, and size of the proposed parking structure;
- Bulk, scale, size, and complexity of the proposed Wellness Pavilion, Aquatics Center, and CHF;
- Viability of a new Medical Office Building instead of renovating the Beach Cities Advanced Imaging Building;
- Size and functionality of the open space;
- Orientation of the proposed building(s) relative to the open space;
- Orientation of the open space toward the campus's main entrance; and
- On-site circulation including site access and drop-off.

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**Phase 2 – Example A:**
**Original June 2020 Phase 2 Development**

**FIGURE 2-11**

Additionally, the specific programs supported in the Phase 2 building space would be based on BCHD's ongoing strategic planning process, which occurs over 3-year intervals. This strategic planning process involves the collection and analysis of data on emergent community health needs and concludes with the selection of health priorities for the Beach Cities. BCHD has begun data collection for the next Community Health Report which will cover 2022-2025. BCHD will continually review this data to track changes in community needs over time and adjust programming accordingly.

#### 2.5.2.3 Example Site Plan Scenarios

As previously described, due to uncertainties in future health and wellness programming, trade-offs associated with site planning and design, and financing considerations, the configuration of physical development under Phase 2 could assume one of several possible site plans. The EIR depicts three example site plan scenarios for the Phase 2 development program to illustrate the possible range of physical development. However, the EIR analyzes operational impacts for the Phase 2 development using conservative assumptions. For example, the trip generation during Phase 2 is dependent of the maximum square footage described for each use. Additionally, the EIR analyzes potential construction-related impacts (e.g., ground disturbance) and aesthetics impacts (e.g., building height) using conservative assumptions related to maximum building footprints and maximum building heights. The ultimate site development plan developed for Phase 2 would fit within this maximum building envelope.

<u>Phase 2 – Example A: Original June 2020 Phase 2 Development</u>

This example site plan scenario was presented to the BCHD Board of Directors on June 17, 2020 as part of an effort to revise the original 2019 Master Plan to address community concerns regarding the total area of development and the total duration of construction activities (refer to Section 1.6, *Project Background*).

This example site plan scenario would include the development of a 4-story Community Health and Wellness Center, rising to a total height of 85 (including rooftop projections) above the campus ground level, which would include a Wellness Pavilion, an Aquatics Center, and a new CHF (refer to Figure 2-11). The proposed Wellness Pavilion would be located on Floors 1 through 4 of the proposed Community Health and Wellness Center. The visitor welcome center, located on Floor 1 of the building, would include an atrium/lobby with a front desk, restrooms, elevators, and a staircase to the upper floors of the building. The visitor welcome center would also include an entrance to the Aquatics Center, which would be located on the ground floor and open out toward the interior of the campus. The CHF would be located on the Floor 2 above a portion of the

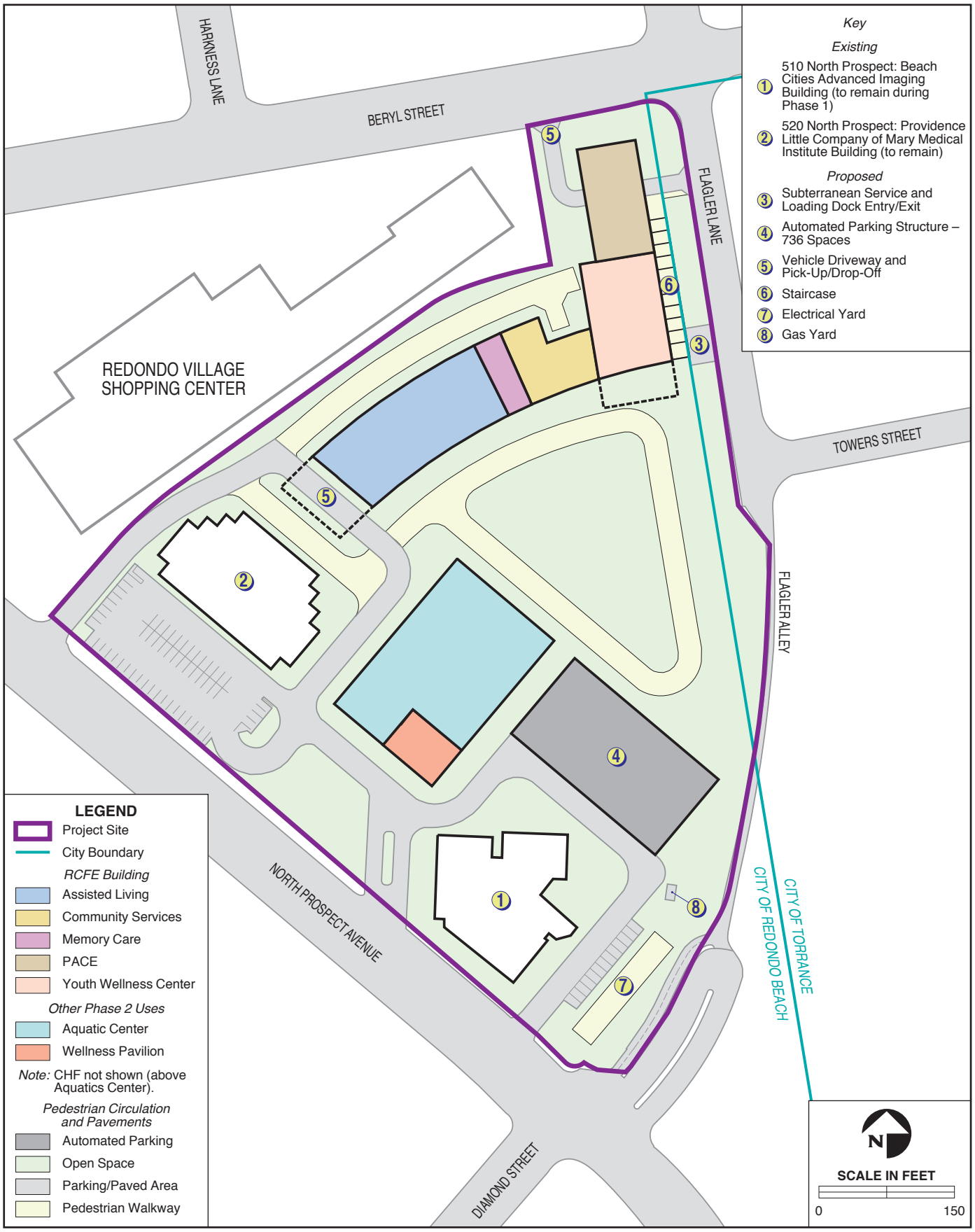
Aquatics Center and would share men's and women's public dressing rooms with lockers, restrooms, and showers. The existing parking structure located at 512 North Prospect Avenue would be demolished to provide space for the Community Health and Wellness Center and a new parking structure. The proposed parking structure would occupy a footprint of 32,500-sf, providing 736 parking spaces (including accessible parking spaces and EV charging stations) over 2 subterranean levels and 8.5 above ground levels, rising to a height of 76 feet above the campus ground level. Access to this new parking structure would be via the secondary entrance from the southern driveway off of North Prospect Avenue.

Phase 2 – Example B: Phase 2 Building with Automated Parking

The Community Health and Wellness Center under this example site plan would be similar to that described for the Example A site plan scenario with a combined Wellness Pavilion, Aquatics Center, and CHF. Additionally, under this example site plan scenario the existing parking structure located at 512 North Prospect Avenue would be demolished to provide space for the Community Health and Wellness Center and a new above ground parking structure (see Figure 2-12).

*Automated parking involves the use of a mechanical system to stack vehicles, thereby maximizing efficiency and minimizing the space necessary to park the same number of vehicles as compared to a traditional parking structure with drive aisles.*

However, the proposed parking structure would be automated (i.e., a mechanical system designed to stack vehicles and minimize the area and/or volume required for parking cars), allowing for a reduced building height and a reduced footprint that provides for more useable open space on the campus. The total footprint of the automated parking structure would be approximately 20,000-sf with parking provided over 1 subterranean level and 3 above ground levels, rising to a height of 71.5 feet above the campus ground level existing ground level and 101.5 feet above the vacant Flagler Lot below. Access to this new parking structure would be via the main signalized entrance as well as the secondary entrance from the southern driveway off of North Prospect Avenue.

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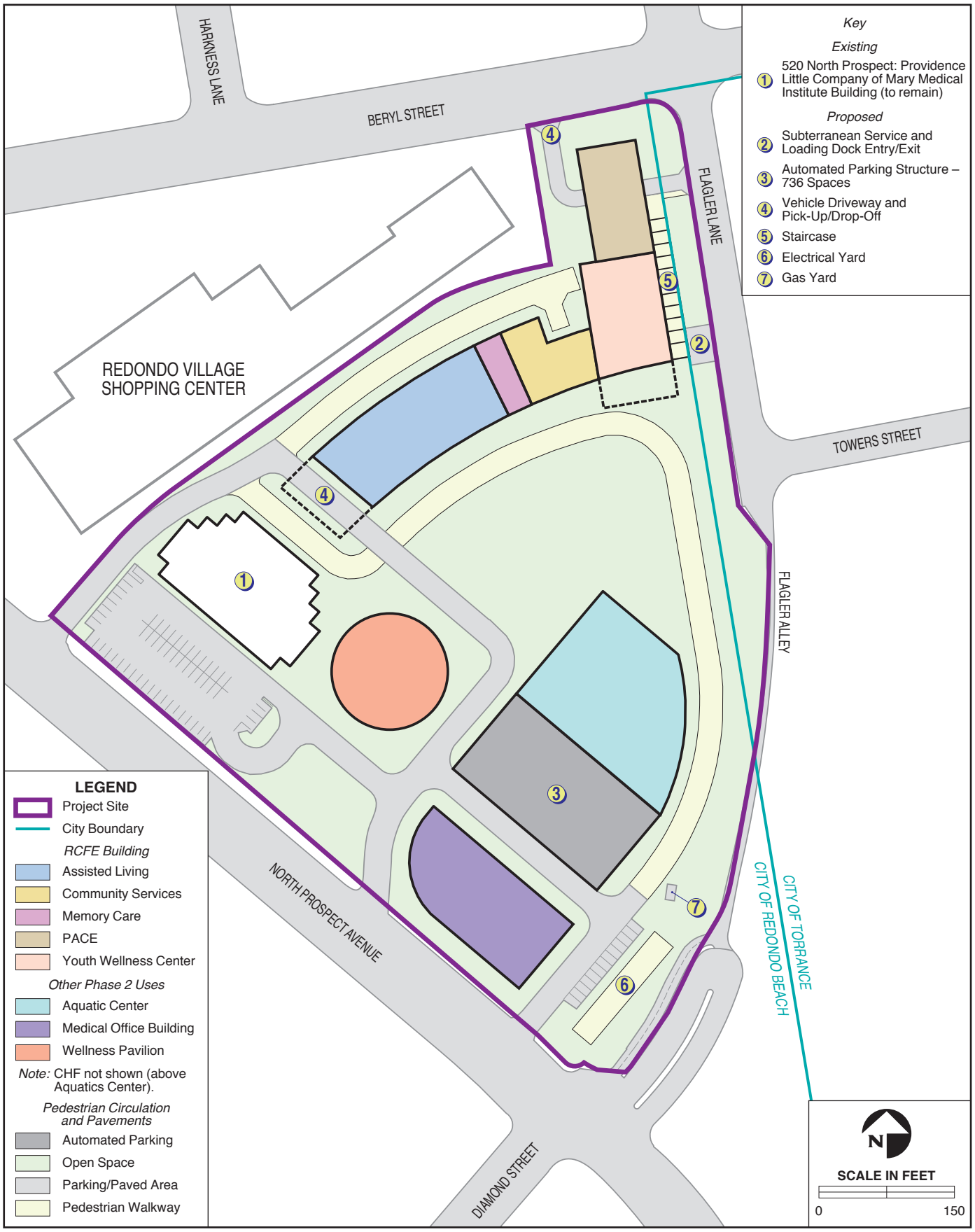
**Phase 2 – Example B:**
**Phase 2 Building with Automated Parking Structure**

**FIGURE 2-12**

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**Phase 2 – Example C: Phase 2 Building with Automated Parking Structure and a New Medical Office Building**

**FIGURE 2-13**

Phase 2 – Example C: Rotated Phase 2 Building(s) with Automated Parking and a New Medical Office Building

This example site plan scenario would be the most intensive in terms of the maximum area of ground disturbance and would involve the demolition of the Beach Cities Advanced Imaging Building in addition to the Beach Cities Health Center as well as the parking structure located at 512 North Prospect Avenue, as described for the Example A and B site plan scenarios.

This example site plan scenario would begin with the demolition of the existing Beach Cities Advanced Imaging Building following the end of existing tenant leases in 2030. This 52,000-sf building would be demolished and redeveloped with a 3-story, 50,000-sf, purpose-built medical office building, which would rise to a height of 55 feet (including rooftop projections) (refer to Figure 2-13) above the campus ground level and 85 feet above the vacant Flagler Lot below.

The redevelopment of the medical office building at 510 North Prospect Avenue and the demolition of the parking structure at 512 North Prospect Avenue would provide space for a new building including the proposed Aquatics Center and CHF as well as the proposed automated parking structure (refer to Figure 2-13). The automated parking structure, which would occupy the south side of the new building would include 1 subterranean level and 3 above ground levels, rising to a height of 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below. The Aquatics Center would be located on the first floor with entrances provided from the automated parking structure as well as the interior open space constructed during Phase 1. The CHF would be located on the second floor above a portion of the Aquatics Center. This portion of the building would rise to a height of approximately 53 feet, approximately 83 feet above the vacant Flagler Lot below. Together the building – including the automated parking structure, Aquatics Center, and CHF – would occupy a total footprint of approximately 47,100 sf. As with the Example B site plan scenario, access to the parking structure would be via the main signalized entrance off of North Prospect Avenue as well as the secondary entrance from the southern driveway off of North Prospect Avenue.

This example site plan scenario would include the development of a circular-shaped, 3-story Wellness Pavilion, rising to a height of 68 feet, located centrally within the campus. The total footprint of the Wellness Pavilion would be approximately 12,380 sf. Entries to the Wellness Pavilion would be provided from the interior open space constructed during Phase 1.

## Table 2-4. Trade-offs with Example Site Plan Scenarios

| Design Considerations | Example A | Example B | Example C | Trade-offs Associated with Example Site Plans |
|---|---|---|---|---|
| Building Space Program | ✓ | ✓ | ✓ | Each of the example site plan scenarios provides health and wellness amenities including the Wellness Pavilion, Aquatics Center, and CHF. The Example A site plan scenario would allow the open space related to the Aquatics Center and CHF to be distinct and separately programmable from the main open space. |
| Phase and Schedule Duration | ✓ | ✓ | | Each of the example site plan scenarios requires the demolition of the existing parking structure located at 512 North Prospect Avenue. The Example C site plan scenario would require delaying the proposed Phase 2 construction activities until after 2030, to allow the existing lease of the Beach Cities Advanced Imaging Building to expire prior to demolition. |
| Building Footprint and Site Coverage | ✓ | ✓ | ✓ | The Example C site plan scenario has the largest building footprint as a result of separating the Wellness Pavilion from the Aquatics Center and the CHF; however, the Example C site plan scenario also reduces the overall site coverage by demolishing the Beach Cities Advanced Imaging Building. |
| Open Space | ✓ | ✓ | ✓ | The Example C site plan scenario consolidates the building footprints mostly to the southeast, thereby expanding the campus open space as compared to Example A and B site plan scenarios. |
| Community Connectivity, Site Zones, and Views | | | ✓ | Each example site plan scenario provides views from the open space to the east; however, the Example C site plan scenario provides the best public visibility to the campus open space. |
| Site Circulation | ✓ | ✓ | ✓ | Each of the example site plan scenarios provide similar access including a new one-way driveway and pick-up/drop-off zone that exits onto Flagler Lane as well as a new service area and loading dock entry/existing along Flagler Lane. |
| Parking | | ✓ | ✓ | The Example A site plan scenario has the tallest parking structure, which is relatively inefficient due to its shape. Example B and C site plan scenarios use a smaller, more efficient automated parking structure. |
| Building Height and Complexity | | | ✓ | The Example A site plan scenario consolidates the Wellness Pavilion, Aquatics Center, and CHF into one building. However, Example C site plan scenario has lower building heights than the Example A and B site plan scenarios. |
| Development Volume | | | ✓ | The Example C site plan scenario has a lower development volume than the Example A and B site plan scenario and a more compact southeast site zone with more campus open space. |
| Architectural Character | | | ✓ | The Example C site plan scenario separates the Wellness Pavilion from the Aquatics Center and CHF. This example site plan scenario allows each building to more appropriately designed for the site and the required programming |

**Table 2-4. Trade-offs with Example Site Plan Scenarios (Continued)**

| Design Considerations | Example A | Example B | Example C | Trade-offs Associated with Example Site Plans |
|---|---|---|---|---|
| Sustainability and Wellness | ✓ | ✓ | ✓ | Each development site plan scenario is similar in offering sustainable design features. The Example C site plan scenario offers the best opportunity for natural ventilation and daylight. |
| Cost | | | | The Example B and C site plan scenarios include the cost of an automated parking structure. Additionally, the Example C site plan scenario includes the cost of a new medical office building. |

#### 2.5.2.4 Construction Activities

Given that a preliminary site development plan has not been finalized for Phase 2, the development program under Phase 2 has been evaluated programmatically. As previously described, the EIR analyzes potential construction-related impacts (e.g., ground disturbance) using conservative assumptions related to maximum building footprints and maximum building heights from each of the example site plan scenarios described above:

- Conservative disturbance footprint of 215,000 sf (4.94 acres);
- Demolition of Parking Structure (512 North Prospect Avenue);
- Demolition of Beach Cities Advanced Imagining Building (510 North Prospect Avenue);
- Development of 138,450 sf in total building area; and
- Development of a parking structure including 292,500 sf with up to 2 subterranean levels and up to 8.5 above ground levels providing 736 parking spaces (including accessible parking spaces and EV charging stations).

The ultimate site development plan developed for Phase 2 would fit within this maximum building envelope. These construction activities associated with Phase 2 of the BCHD Healthy Living Campus Master Plan would occur over a period of 28 months.

As described for Phase 1, the development application for Phase 2 submitted to the City of Redondo Beach would include a comprehensive Construction Management Plan, to be submitted for review and approval by the Redondo Beach and Torrance Building & Safety Divisions prior to the issuance of demolition, grading, or building permits. Approvals from the City of Torrance may also be required for new improvements required within the City of Torrance right-of-way (e.g., utility infrastructure improvements as well as the proposed curb cut, grading and the construction of retaining walls for the service area and loading dock entry/exit in accordance with TMC Section 92.13.12[d]). BCHD would work within standard construction hours consistent with RBMC

Section 4-24.503 and TMC Section 6-46.3.1. All construction activities would be staged within secured construction areas within or adjacent to the Project site. Construction trucks would access the site from one of the existing driveways along North Prospect Avenue. Haul trucks would exit the I-405 freeway on 190th Street or Hawthorne Avenue to 190th Street and reach the site using Del Amo Street to North Prospect Avenue. Residential streets would be avoided to the maximum extent feasible. Construction entry to the Project site would be provided along North Prospect Avenue where construction flaggers would be stationed to direct construction traffic and maintain public safety. Additionally, emergency services vehicle access points would be maintained at North Prospect Avenue and Beryl Street. Fire lanes would be maintained at all times during construction work. The ~~RBPD and RBFD~~ RBFD, RBPD, TFD, and TPD would also have access to the Project site 24 hours per day via fence-mounted lockboxes to open gates securing the Project site.

Demolition, Excavation, and Grading

Demolition activities under Phase 2 would begin with the demolition of the existing parking structure located at 512 North Prospect Avenue and demolition of the Beach Cities Advanced Imaging Building. The demolition of the existing parking structure would occur over a 1-month period involving the export of 7,000 cy of demolition debris. The demolition of the Beach Cities Advanced Imaging Building would occur over a 3-month period and would involve the export of 8,550 cy of demolition debris. Demolition debris would be exported off-site in 972 heavy truck trips. Excavation and utilities work would occur over a 1-month period and would involve the export of 11,000 cy of soil in 688 heavy truck trips. Demolition, excavation, and grading activities for Phase 2 development would require use of similar types of equipment as described for Phase 1. Excavation and hauling of earth would comply with SCAQMD rules for the control of hauling impacts, including dust and diesel emissions.

Construction

Phase 2 of construction would include up to 138,450 sf in total building area and an above-ground parking structure of up to 292,500. The building(s) and parking structure would be constructed using similar materials as described for Phase 1. However, the building(s) would likely be framed using structural steel and metal deck, unlike the RCFE Building, which would be framed with wood and/or concrete.

- Construction of the new medical office building would occur over a 6-month period and would involve 2,050 cy of concrete delivered to the Project site in 257 concrete truck trips as well as 400 tons of steel delivered in 20 truck trips.

- Construction of the Wellness Pavilion would occur over a 6-month period and would involve 1,523 cy delivered to the Project site in 184 concrete truck trips and 300 tons of steel delivered in 15 truck trips.
- Construction of the Aquatics Center and CHF would occur over a 7-month period and would involve 2,290 cy of concrete delivered to the Project site in 280 concrete truck trips as well as 350 tons of steel delivered in 18 truck trips.
- Construction of the parking structure would occur over a 12-month period and would involve 11,000 cy of concrete delivered to the Project site in 1,375 concrete truck trips.

# 3.0 ENVIRONMENTAL IMPACT ANALYSIS AND MITIGATION MEASURES

## 3.0.1 Introduction

This section of the Environmental Impact Report (EIR) describes the potentially significant environmental impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project). The EIR addresses potential environmental impacts that could result from both construction and operation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program (refer to Section 2.0, *Project Description*). The discussion of each environmental topic area analyzed within the EIR (refer to Section 1.7, *Scope of the EIR*) is subdivided into the following subsections: *Environmental Setting, Regulatory Setting*, *Impact Assessment and Methodology*, and *Project Impacts and Mitigation Measures,* and *Cumulative Impacts*.

<u>Impact Assessment Guidelines and Impact Classification</u>

The California Environmental Quality Act (CEQA) requires an EIR analysis to "*identify and focus on the significant environmental effects of a proposed project*" (CEQA Guidelines 15126.2[a] and Public Resources Code Section 21000[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change in significant."* Accordingly, the EIR analyzes the potential *"physical"* adverse effects of a project. CEQA Guidelines Section 15360 defines *"environment"* as the physical conditions that exist within the area that would be affected by a project including, but not limited to, land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The environment includes both natural and human-made conditions.

For each environmental topic area, the thresholds for determining the significance of potential impacts are identified based on Appendix G of the CEQA Guidelines, along with descriptions of methodologies used for conducting the impact analysis. For some environmental topic areas, such as air quality, greenhouse gas (GHG) emissions, noise, and transportation, the analyses of impacts are quantitative in nature and involve the comparison of potential impacts against numerical thresholds. For other environmental topic areas, such as land use and planning, the analyses of impacts are inherently more qualitative, involving the consideration of a variety of factors, such as adopted policies and regulations.

Impacts associated with the proposed Project have been classified as direct or indirect and short-term or long-term. Direct effects are caused by the implementation of the proposed Project and occur at the same time and within the same region~~al~~ as the proposed Project. Indirect effects are also reasonably foreseeable outcomes of the proposed Project, but occur farther from the Project site or later in time. Short-term impacts occur during or for a short time after implementation of a project, such as during or immediately after construction. For example, noise impacts from construction activities would be considered a short-term effect. By contrast, long-term effects occur for an extended period after implementation of a project. Operational noise during facility operations would be a long-term impact, because it would last for as long as the facility is in operation.

For the purposes of compliance with CEQA, a determination has been made regarding the significance of each adverse impact identified for the proposed Project. Thresholds of significance, the basis for which is set forth in CEQA Guidelines Section 15064.7, are identified for each environmental topic area in the *Impact Assessment and Methodology* section. These thresholds enable BCHD, as the lead agency, to determine the significance of each impact. In addition, the determination of an impact's significance may be derived from standards set by relevant Federal, State, and local agencies; knowledge of the effects of similar past projects; professional judgment; and plans and policies adopted by governmental agencies. If a potentially significant impact is identified, feasible mitigation measure(s) are required to avoid or minimize the impact to the extent feasible.

The EIR impact discussions classify impact significance levels as:

- **Significant and Unavoidable** – a significant impact to the environment that remains significant even after mitigation measures are applied;
- **Less Than Significant with Mitigation** – a significant impact to the environment that can be avoided or reduced to a less than significant level with mitigation;
- **Less Than Significant** – a potential impact that would not meet or exceed the identified thresholds of significance for the environmental topic area; and
- **No Impact/Beneficial Impact** – no impact would occur for the environmental topic area or a beneficial effect would result.

Determinations of significance levels in the EIR are made based on the thresholds of significance and the applicable provisions of CEQA and the CEQA Guidelines for each environmental topic area.

Mitigation Measures and Monitoring

Pursuant to CEQA Guidelines Section 15126.4, where potentially significant adverse environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts must also be identified and implemented.

CEQA Guidelines Section 15370 define mitigation as:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action;

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation;

(c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and

(e) Compensating for the impact by replacing or providing substitute resources or environments.

*"Feasible"* is defined as *"capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."* A lead agency must adopt mitigation measures unless findings can be made that mitigation would be infeasible or within the jurisdiction of another agency (*City of Marina v. Board of Trustees of the California State University [2006] 39 Cal.4th 341*). Mitigation measures must be fully enforceable. For public projects, in this case the proposed BCHD Healthy Living Campus Master Plan, the mitigation measures will be adopted into the plan and the project design as required by CEQA Guidelines 15126.4(a)(2).

The mitigation measures are identified as part of the analysis of each impact topic in Sections 3.1 through 3.15 of this EIR. CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a Mitigation Monitoring and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*…until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" An MMRP will be provided in Section 11.0, *Mitigation Monitoring and Reporting Program* following public review of the Draft EIR as part of the Final EIR.

### 3.0.2 Cumulative Impacts

CEQA Guidelines Section 15130(a) states that an EIR shall *"discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable."* In this context, *"cumulatively considerable"* means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and/or the effects of probable future projects (as defined by CEQA Guidelines Section 15130). The CEQA Guidelines define cumulative impacts as *"two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts."* CEQA Guidelines Section 15355 further state that the individual effects can be a result of various changes related to a single project or the collective change involved in a number of other closely related past, present, and reasonably foreseeable future projects. However, as described in CEQA Guidelines Section 15064(h)(4) it should be noted that *"[t]he mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."*

Therefore, the cumulative impact analyses in an EIR focuses on whether the impacts of a project are cumulatively considerable within the context of impacts caused by other past, present, or future projects. The determination of whether an impact is cumulatively considerable takes into consideration the severity and likelihood of the impact as well as the magnitude of the project's contribution to the cumulative impact. In some circumstances, even a minor project effect can make a substantial contribution to a cumulative impact, meaning that as a cumulative impact becomes more acute, even a small individual contribution to that impact can be considered cumulatively considerable. Cumulative impact discussions for each environmental topic area are provided in each of the respective EIR sections.

The CEQA Guidelines allow for the use of two different methods to determine the scope of projects for the cumulative impact analysis:

- **List Method** – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (CEQA Guidelines Section 15130).
- **Planning Document Method** – A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document, which has been adopted or certified, and which described or evaluated regional or area-wide conditions contributing to the cumulative impact (CEQA Guidelines Section 15130).

This EIR examines cumulative effects using the List Method. Tables 3.0-1, 3.0-2, 3.0-3, and 3.0-4 include lists of pending, approved, and recently completed projects within cities of Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach within 3 miles of the Project site. These projects, due to their proximity, are considered for their potential to result in construction and/or operational impacts that could overlap with the direct and indirect impacts associated with the proposed Project. The tables below do not include projects that are limited to the adjustment of property lines (e.g., lot line, adjustments, subdivisions, etc.) or other evaluations or assessment-type projects that do not include construction activities or physical alterations to existing facilities. These types of projects would not contribute to cumulative impacts to the surrounding environment as evaluated in this EIR. The approximate locations of projects that are in the immediate vicinity of the proposed Project are shown in Figure 3.0-1.

Cumulative impacts evaluated in this EIR would likely represent a "worst-case" scenario for the following reasons:

- Not all of the related projects described in Tables 3.0-1, 3.0-2, 3.0-3, and 3.0-4 will be approved and built. It is also possible that related projects will not be constructed or opened until after the proposed Project has been built;
- Related projects would likely be, or have been, subject to unspecified mitigation measures, which would reduce potential environmental impacts.

Regional issues regarding the supply of water and treatment of wastewater also take into account regional projections, such as those provided by the Southern California Association of Governments (SCAG) in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The cumulative analyses for air quality, GHG emissions, geology and soils, hydrology and water quality, and energy also account for cumulative development throughout the full extent of the Redondo Beach, Torrance, other neighboring cities, and beyond.

Redondo Beach

A list of all pending, approved, and recently completed projects in Redondo Beach within 3 miles of the Project site is included in Table 3.0-1.Current projects in Redondo Beach are defined as projects that are in an active planning stage, under construction, or recently completed. The cumulative list provided in Table 3.0-1 is based on the current and planned projects listed on the Redondo Beach Public Works Department website and the Redondo's Beach 5-Year Capital Improvement Program (CIP).

## Table 3.0-1. Planned, Pending, Approved and Recently Completed Public Works Projects in Redondo Beach

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ***Public Works Projects*** | | | | | |
| **1** | 2016-2017 Sewer Rehabilitation Project | Infrastructure | Multiple locations in the City of Redondo Beach | Upgrades involving rehabilitation and replacement of the City's underground sanitary sewer conveyance system. | Completed |
| **2** | 2017 Pier Parking Structure | Infrastructure | 100 W Torrance Blvd | 6,000-sf of concrete repairs to the south pier parking structure | Completed |
| **3** | Public Facilities and Storage Lot Improvements | Infrastructure | 1513 Beryl St / 546 N Gertruda Ave | Remove and replace asphalt concrete and installation of permeable pavement material | Completed |
| **4** | Palos Verdes Southbound Right-Turn Lane | Infrastructure | Palos Verdes Blvd and S PCH | Construct a new right-turn lane | Completed |
| **5** | Residential Street Rehabilitation Phase 12 | Infrastructure | Downtown Redondo Beach | Final phase of a 17-year cycle to rehabilitate City residential streets over an approximately 1,800-sf area | Completed |
| **6** | Aviation Blvd Northbound Right-Turn Lane | Infrastructure | Aviation Blvd and Artesia Blvd | Construct a new right-turn lane | Pending |
| ***5-Year CIP Projects*** | | | | | |
| **7** | Inglewood Ave Resurfacing | Infrastructure | Inglewood Ave between 190th St and Grant Ave | Resurface asphalt roadway | Completed |
| **8** | Rindge Sewer Pump Station Construction | Infrastructure | Rindge Ln at Ripley Ave | Replace pumping station | Completed |
| **9** | Flagler Lane Resurfacing | Infrastructure | Flagler Ln between Beryl St and 190th St / Anita St | Resurface asphalt roadway | Completed |
| **10** | Pier Parking Structure Repairs and Railing Rehabilitation | Infrastructure | 123 International Boardwalk | Repair parking structure | Completed |

**Table 3.0-1. Planned, Pending, Approved and Recently Completed Public Works Projects in Redondo Beach (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| 11 | PCH Northbound Right-Turn Lane at Torrance Blvd | Infrastructure | Northbound Lane S PCH at Eastbound Ln Torrance Blvd | Removal of sidewalk on PCH. And construction of a right-turn lane from PCH northbound to Torrance Blvd eastbound. Reconstruct catch basins, bus pad, sidewalk, curb and gutter, and traffic signal improvements | Completed |
| 12 | PCH Pavement Rehabilitation | Infrastructure | All of PCH within Redondo Beach | ~~Resurface asphalt roadway~~Slurry seal roadway | Completed |
| 13 | PCH Roadway, Signal, and Pedestrian Improvements | Infrastructure | All of PCH in the South Bay | Resurface asphalt roadway, upgrade signal systems, and implement Americans with Disabilities Act (ADA) improvements | Construction scheduled for FY 2022-2024 |
| 14~~13~~ | Beryl St Drainage & Street Improvements | Infrastructure | Beryl St (N Prospect Ave to Flagler Ln) | Construct street and drainage improvements. The design of the project would incorporate Living Street Design principles. | Construction scheduled for FY 2020-2021 |
| 15~~14~~ | Anita / Herondo and PCH West Bound Right-Turn Lane | Infrastructure | Anita / Herondo St and PCH | Extend the west bound dual left-turn lane from the existing 175 feet to 310 feet and extend the west bound right turn lane to approximately 510 feet | Construction scheduled for FY 2020-2021 |
| 16~~15~~ | Dominguez Park Dog Park Improvements | Public Facilities | 200 Flagler Ln | Repair and replace site amenities including benches, fencing, and landscaping | Proposed for FY 2020-2021 |
| 17~~16~~ | Dominguez Park Play Equipment, Landscape & Walkways | Public Facilities | 200 Flagler Ln | Replace deteriorated play equipment and rubber surfacing and upgrade adjacent landscape and walkways | Proposed for FY 2020-2021 |
| 18~~17~~ | Rindge Lane Resurfacing | Infrastructure | Rindge Ln (190th St to Artesia Blvd) | Resurface and rehabilitate Rindge Lane and repair and replace ramps, curbs and gutters as necessary | Construction scheduled for FY 2023-2024 |
| 19~~18~~ | Police Department Shooting Range Upgrade | Infrastructure | 19160 N Beryl St | Install a modular shooting range at the site of the current police shooting range | Design phase to occur in Fall 2020 |
| 20~~19~~ | Alta Vista Sewer Pump Station | Infrastructure | Alta Vista Park | Replace two deficient and damaged pump houses with one pump station | Construction scheduled for FY 2020-2021 |

**Table 3.0-1. Planned, Pending, Approved and Recently Completed Public Works Projects in Redondo Beach (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| **21~~20~~** | Morgan Sewer Pump Station | Infrastructure | Morgan Ln between Goodman Ave and Reynolds Ln | Replace a deficient pump station | Design phase to occur in FY 2020-2021 |
| **22~~21~~** | Portofino Way Sewer Pump Station | Infrastructure | Portofino Way | Replace a deficient pump station | Construction schedules for FY 2020-2021 |
| **23~~22~~** | Yacht Club Way Sewer Pump Station | Infrastructure | Yacht Club Way near Yacht Club Way and Hopkins Way intersection | Replace deficient pump station | Construction scheduled for FY 2020-2021 |
| **24~~23~~** | Manhattan Beach Blvd Resurfacing – Aviation Blvd to Inglewood Ave | Infrastructure | Manhattan Beach Blvd from Aviation Blvd to Inglewood Ave | This project will resurface Manhattan Beach Blvd from Aviation Blvd to Inglewood Ave | Construction scheduled for spring 2021 |
| **25~~24~~** | North Redondo Beach Bikeway Extension – Felton Ln to Inglewood Ave | Infrastructure | North Redondo Beach Bikeway from Felton Ln to Inglewood Ave | Extend North Redondo Beach Bikeway from Felton Ln to Inglewood Ave and continue the implementation of the City's Bicycle Transportation Plan | Construction planned for 2021 |
| **26~~25~~** | North Redondo Beach Bikeway Extension – Inglewood Ave Design | Infrastructure | North Redondo Beach Bikeway from Inglewood Ave to Ripley Ave | Extend North Redondo Beach Bikeway from the end of its planned extension southward along Inglewood Ave to Ripley Ave | Design phase to occur in FY 2020-2021 |
| **27~~26~~** | Torrance Blvd Resurfacing | Infrastructure | Torrance Blvd from PCH to Prospect Ave | Resurface Torrance Blvd | Construction scheduled for FY 2020-2021 |
| **28~~27~~** | Basin 3 Seawall Improvements | Infrastructure | Basin 3 | Provide critical repairs to areas of the Basin 3 seawall | Construction planned for FY 2022-2023 |
| **29~~28~~** | Basin 3 Slip Replacement | Infrastructure | Basin 3 | Replace slips of Basin 3 to preserve functionality | Construction planned for FY 2022-2023 |
| **30~~29~~** | Harbor Dredging | Infrastructure | King Harbor | Dredge King Harbor to sustain navigation functionality | Dredging to occur in 2022 |
| **31~~30~~** | Harbor Railing Replacement | Infrastructure | King Harbor | Replace approximately 2 miles of railing around the harbor | Installation to occur in FY 2020-2021 |
| **32~~31~~** | Pier Deck & Piling Structure Repairs | Infrastructure | Redondo Beach Pier | Repair pier decking and pilings | N/A |

**Table 3.0-1. Planned, Pending, Approved and Recently Completed Public Works Projects in Redondo Beach (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| 33~~32~~ | Pier Parking Structure Critical Repairs & Railing Rehabilitation | Infrastructure | Redondo Beach Pier | Structural repairs to pier railing and pier parking structure | Construction to occur in Fall 2021 |
| 34~~33~~ | Pier Restroom Improvements | Public Facilities | Basin 3 | Remodel existing men's and women's restroom | Construction to occur in FY 2020-2021 |
| 35~~34~~ | Relocation of Boat Launch | Infrastructure | Seaside Lagoon | Installation of a recreational boat launch facility within King Harbor | Construction to occur in FY 2021-2022 |
| 36~~35~~ | Sea Level Rise Improvements | Infrastructure | King Harbor | Increase height of existing concrete seawalls and breakwaters, and make other facility improvements | Construction to occur in FY 2022-2023 |
| 37~~36~~ | Sport Fishing Pier Demolition and Reconstruction | Infrastructure | Sport fishing pier located between Basin 2 and 3 | Demolition and reconstruction of the sport fishing pier structure | Construction to occur in FY 2022-2023 |
| 38~~37~~ | Aviation Park Play Equipment | Public Facilities | Aviation Park | Replace deteriorated picnic area amenities, play equipment, and rubber surfacing | Construction to occur in FY 2022-2023 |
| 39~~38~~ | General Eaton B Parkette Improvements | Public Facilities | General B Parkette Improvements | Replace landscaping and play equipment at General Eaton B Parkette | Design phase to occur in FY 2021-2022 |
| 40~~39~~ | Massena Parkette Playground Equipment | Public Facilities | Massena Parkette | Replace play equipment | Construction to occur in FY 2022-2023 |
| 41~~40~~ | Play Surface Replacement at Anderson Park & Perry Park | Public Facilities | Anderson Park and Perry Park | Replace rubber surfacing | Construction to occur in FY 2020-2021 |
| 42~~41~~ | City Hall and Police Department Window and Storefront Improvements | Public Service | 415 Diamond St | Replace windows and other amenities at Redondo Beach City Hall | Construction to occur in FY 2023-2024 |
| 43~~42~~ | Redondo Beach Performing Arts Center Replacement of Electronic Message Board | Public Facilities | 1935 Manhattan Beach Blvd | Replacement of the electronic components of the message board sign | Estimated to occur in Winter 2021 |
| 44~~43~~ | Broadcast Facility/City | Public Facilities | 415 Diamond St | Upgrade City Council Chambers facility and equipment to enhance | Construction to occur in FY 2020-2021 |

## Table 3.0-1. Planned, Pending, Approved and Recently Completed Public Works Projects in Redondo Beach (Continued)

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| | Council Chamber Upgrades | | | television broadcasting opportunities | |
| ~~44~~45 | Transit Fleet Operations Center | Public Facilities | 1953 Kingsdale Ave | Maintenance and Facility upgrades to the transit fleet operations center | Construction to occur in Spring 2021 |
| ***Planning Projects*** | | | | | |
| ~~45~~46 | - | Residential | 2008 Farrell Ave | Addition and remodel of Condominium development | Approved |
| ~~46~~47 | - | Residential | 1908 Bataan Rd | 2-unit residential condominium development | Approved |
| ~~47~~48 | - | Residential | 2117 Voorhees Ave | 2-unit residential condominium development | Approved |
| ~~48~~49 | - | Residential | 2216 Gates Ave | 2-unit residential condominium development | Approved |
| ~~49~~50 | - | Residential | 2003 Gates Ave | 2-unit residential condominium development | Approved |
| ~~50~~51 | - | Residential | 2306 Aviation Blvd | 3-unit residential condominium development | Approved |
| ~~51~~52 | - | Commercial | 221 Ave I | Operation of 2,000-sf restaurant | Approved |
| ~~52~~53 | - | Commercial | 2761 190th St | Installation of a monument sign for a church | Approved |
| ~~53~~54 | - | Commercial | 601-607 North PCH | Expansion of an existing restaurant over 2,000-sf in size | Approved |
| ~~54~~55 | - | Commercial | 1806 Artesia Blvd | Interior reconfiguration of existing music school | Approved |
| ~~55~~56 | - | Commercial | 800 South PCH | Expansion of an existing restaurant into an adjacent tenant space | Approved |
| ~~56~~57 | - | Residential | 2101 Rockefeller Ln | 2-unit residential condominium development | Approved |
| ~~57~~58 | - | Residential | 2002 Ruhland Ave | 2-unit residential condominium development | Approved |
| ~~58~~59 | - | Commercial | 2321 Hawthorne Blvd | Construction of new commercial building to operate as a coffee shop with drive-up service | Approved |
| ~~59~~60 | - | Residential | 217 South Prospect Ave | 5-unit residential condominium development | Approved |
| ~~60~~61 | - | Residential | 2608 Huntington Ln | 2-unit residential condominium development | Approved |

**Table 3.0-1. Planned, Pending, Approved and Recently Completed Public Works Projects in Redondo Beach (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ~~61~~62 | - | Residential | 190th St and Fisk Ln | 36-unit residential condominium over 2.37 acres | Approved |
| ~~62~~63 | - | Residential | 1010 Emerald St | Construction of a new single-family dwelling with an existing single-car detached garage and nonconforming driveway and reduce side yard setbacks on property | Approved |
| ~~63~~64 | - | Residential | 2520 Curtis Ave | 2-unit residential condominium development | Approved |
| ~~64~~65 | - | Residential | 2736 Spreckels Ln | Addition to an existing single-family residence connecting to the detached garage on the property | Approved |
| ~~65~~66 | - | Residential | 2314 Huntington Ln | 2-unit residential condominium development | Approved |
| ~~66~~67 | - | Residential | 1705 Belmont Ln | 2-unit residential condominium development | Pending |
| ~~67~~68 | - | Residential | 519 N Irena Ave | 2-unit residential condominium development | Pending |
| ~~68~~69 | | Residential | 2216 Bataan Rd | 2-unit residential condominium development | Pending |
| ~~69~~70 | | Residential | 1710 Clark Ln | 2-unit residential condominium development | Pending |
| ~~70~~71 | | Residential | 2623 Voorhees Ave | 2-unit residential condominium development | Pending |
| ~~71~~72 | | Commercial | 1900 South PCH #103 | Operation of a tutoring center within an existing commercial building | Pending |
| ~~72~~73 | | Residential | 2317 Vanderbilt Ln | 3-unit residential condominium development | Pending |
| ~~73~~74 | | Residential | 2217 Dufour Ave | 2-unit residential condominium development | Pending |
| ~~74~~75 | | Residential | 2304 Harriman Ln | 2-unit residential condominium development | Pending |

Note: Project locations depicted in Figure 3.0-1 are highlighted in blue within Table 3.0-1 and are located near the Project site.
Source: City of Redondo Beach 2020a, 2020b, 2020c, 2020d

The 5-Year CIP is a multi-year planning and budget document that describes proposed infrastructure and facility improvements which frequently take several years to fund, design, and build. This City-wide cumulative list is primarily utilized for assessment of construction-related cumulative impacts (e.g., noise and construction-related traffic and access) and for more regional issues that extend beyond the immediate vicinity such as air quality and GHG emissions. Projects listed in the 5-Year CIP include both site-specific projects and projects that would be implemented City-wide or across multiple locations within the City. The 5-Year CIP is divided into a proposed Fiscal Year (FY) 2020-2021 CIP and a funding plan for FY 2024-2025. The FY 2020-2021 CIP places emphasis on the City-wide rehabilitation of existing street, sewer, park, and public facility infrastructure. Most of the City's capital funding is allocated to various City-wide street improvement projects. The sewer projects recommended for funding include City-wide continuation of the Sanitary Sewer Facilities Rehabilitation Project. Funded drainage projects include ongoing municipal stormwater quality permit obligations, such as meeting the contractual requirements of the recently adopted Enhanced Watershed Management Program, implementation of the City-wide Drainage Improvement Project, Green Street Improvements, Santa Monica Bay Near/Offshore Debris Total Maximum Daily Load projects. Additionally, funding for the reconstruction of antiquated storm drainpipes is proposed in FY 2020-2021. City-wide street improvements included in the 5-Year CIP include implementation of the Redondo Beach Bicycle Transportation Plan, curb ramp improvements, slurry seal program, sidewalk, curb, and gutter maintenance, residential street rehabilitation, sidewalk improvements and repairs, traffic calming improvements, and upgrades to the traffic signal communications and network system. City-wide Public Facility Projects include additional grant funding for transit fleet improvements, lighting replacements along park walkways, an assessment of City-wide parkette retaining wall integrity, an assessment of Community Services Department Relocation, and senior center heating, ventilation, and air conditioning (HVAC) improvements. While capital improvement projects would not result in long-term development, depending on their timing, these projects could contribute to temporary, construction related air emissions, noise, and traffic that could affect the surrounding communities. Additionally, depending on timing, these projects may also affect access to the Project site (e.g., road re-surfacing resulting in temporary closure or detours).

Torrance

A list of all pending, approved, and recently completed projects in ~~Redondo Beach~~Torrance within 3 miles of the Project site is included in Table 3.0-2. In addition to site-specific CIP projects, the City of Torrance has also included funding for CIP projects that would be implemented City-wide such as annual residential and arterial pavement improvements, sidewalk improvements and repairs, traffic signal upgrades installation of new Low Impact Development (LID) amenities, installation of catch basin filters within basins in the Dominguez Channel, installation of new street lights and an underground serviced street lighting system, miscellaneous water main replacements, miscellaneous sewer main improvements, upgrades to the Torrance Supervisory Control and Data Acquisition, update to the Torrance Sewer System Master Plan, and expansions to the Torrance stormwater basin system. While capital improvement projects would not result in long-term development, depending on their timing, these projects could contribute to temporary, construction related air emissions, noise, and traffic that could affect the surrounding communities. Additionally, depending on timing, these projects may also affect access to the Project site (e.g., road re-surfacing resulting in temporary closure or detours).

Hermosa Beach

A list of all pending,~~,~~ approved, and recently completed projects in Hermosa Beach within 3 miles of the Project site is included in Table 3.0-3. In addition to site-specific CIP projects, the City of Hermosa Beach has also included funding for CIP projects that would be implemented City-wide or at multiple locations within the City. City-wide CIP projects include annual street improvements, street improvements at various locations, annual striping improvements, storm drain improvements, sewer improvements, and accessibility improvements. The CIP also includes programmatic and assessment projects. Such assessment projects include the Hermosa Avenue Greenwich Village street realignment assessment, a City-wide sea level rise risk assessment, a City-wide park master plan, a greenbelt accessible path assessment, a library community project assessment, and a community theater needs assessment, and a parking structure structural assessment. Assessment, evaluation, or programmatic based CIP projects were not included in Table 3.0-3. Due to the nature of these assessments, no construction activities or other physical alterations to exiting conditions would occur and therefore potential impacts associated with these projects would not contribute to cumulative impacts.

## Table 3.0-2. Planned, Pending, Approved, and Recently Completed Projects in Torrance

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ***Major Projects*** | | | | | |
| ~~75~~76 | - | Housing, commercial, and infrastructure | Carson St and Del Amo Circle Dr | Mixed use development of a senior housing village, an executive stay hotel, and parking structure | Completed |
| ~~76~~77 | - | Residential | 6160 PCH | New 5-unit, 2-story, multiple family residential building with lower level parking | Completed |
| ~~77~~78 | - | Commercial | 23332 Hawthorne Blvd | 36,000-sf commercial building and division of a lot | Completed |
| ~~78~~79 | - | Day care | 21321 Hawthorne Blvd | Construction of a new daycare facility in conjunction with at previously approved precision plan | Completed |
| ~~79~~80 | - | Residential Community | 20411 Earl St | Zone change in conjunction with construction of a 25-multiple family residential community | Approved |
| ~~80~~81 | - | Senior Living Apartments, commercial and parking structure | Northeast corner of Carson St and Del Amo Circle Dr | Mixed-use development composed of a senior housing village, an executive stay hotel, and a parking structure | Approved |
| ~~81~~82 | - | Medical Office | 20528 Hawthorne Blvd | Redevelop a property as 3-story medical office | Approved |
| ~~82~~83 | - | Commercial | 20020 Hawthorne Blvd | Construct a new drive-through restaurant within existing shopping center | Approved |
| ~~83~~84 | - | Commercial | 23000 Hawthorne Blvd | Demolition of an existing retail store and construction of a 3,600-sf drive through restaurant | Approved |
| ~~84~~85 | - | Industrial | West side of Prairie Ave approximately 520 feet south of 190th St | Develop a 430,000-sf industrial/warehouse complex | Approved |
| ***Capital Improvement Projects*** | | | | | |
| ~~85~~86 | Miscellaneous Water Main Improvements | Infrastructure | Artesia Blvd between the railroad and Prairie Ave | Replace water lines | Under Construction |

**Table 3.0-2. Planned, Pending, Approved, and Recently Completed Projects in Torrance (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ~~86~~87 | North Torrance Well Field Project, Phase III | Infrastructure | McMaster Park | Construction for new water infrastructure | Under Construction |
| ~~87~~88 | Torrance Transit Park and Ride Regional Terminal | Infrastructure | 465 Crenshaw Blvd | Construct a new transit terminal over a 5-acre parcel | Under Construction |
| ~~88~~89 | PCH at Hawthorne Blvd Intersection Improvement Project | Infrastructure | Hawthorne Blvd and PCH | Provide three through lanes, dual left turn lanes, and dedicated right-turn lanes in all four directions | Pending |
| ~~89~~90 | Sepulveda Blvd Rehabilitation | Infrastructure | Sepulveda Blvd from Hawthorne Blvd to Western Ave | Pavement rehabilitation | Pending |
| ~~90~~91 | Yukon Ave Pump Station | Infrastructure | Yukon Ave where it crosses I-405 | Replace pump station | Pending |
| ~~91~~92 | 182nd St / Crenshaw Blvd Operation Improvements | Infrastructure | I-405 at Crenshaw Blvd and 182nd St | Improve I-405 mainline and off ramps | Under Design |
| ~~92~~93 | Anza Ave Rehabilitation | Infrastructure | Anza Ave between Sepulveda Blvd and Del Amo Blvd | Construct roadway improvements including pavement, curb, gutter, and sidewalk improvements | Under Design |
| ~~93~~94 | Del Amo 5 Relief Sewer | Infrastructure | Hawthorne Blvd between Sepulveda Blvd and Carson St | Upsize existing sewer main | Under Design |
| ~~94~~95 | Del Amo Storm Drain Channel | Infrastructure | South side of Del Amo Blvd and 600 feet east of Van Ness Ave | Construct reinforced concrete box storm drain system | Under Design |
| ~~95~~96 | Prairie Ave Bridge Rehabilitation | Infrastructure | Prairie Ave and railroad | Rehabilitate existing bridge | Under Design |

Note: Project locations depicted in Figure 3.0-1 are highlighted in blue within Table 3.0-2 and are located near the Project site.
Sources: City of Torrance 2020a, 2020b.

## Table 3.0-3. Planned, Pending, Approved, and Recently Completed Projects in Hermosa Beach

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ~~96~~97 | Transpacific Submarine Fiber Optic Cable Systems 2016-2017 | Communications Infrastructure | 25th St and Neptune Ave | Submarine cables connecting communications between the U.S. and Southeast Asia | Completed |
| ~~97~~98 | Skechers Design Center and Offices | Office Buildings | 2851, 2901, 3001, and 3125 PCH; 305, 309, and 317 S Sepulveda Blvd; 1050 Duncan Ave; 330 S Sepulveda Blvd | 120,000-sf design center and executive offices | Under Construction |
| ~~98~~99 | Hope Chapel / Lazy Acres Supermarket | Mixed-Use | 2420 PCH | 30,000-sf natural and organic food supermarket | Completed |
| ~~99~~100 | 70 Tenth St Motel Development | Commercial | 70 10th St | Development of a 4,500-sf, six-unit commercial motel | Approved |
| ~~100~~101 | RTI Transpacific Fiber-Optic Cables | Communications Infrastructure | 6th St (Option A) or 10th St (Option B) between Hermosa Ave Manhattan Ave | Install a cable landing site to connect with an existing power feed equipment facility | On Hold |
| ~~102~~103 | Strand and Pier Hotel | Restaurant, retail, and hotel | 11, 19, and 21-25 Pier Ave; 1250, 1272, & 1284 The Strand; and 20, 30, & 32 13th St | Construction of a 155,000-sf mixed-use hotel building | On Hold |
| ~~103~~104 | Fire Station 100 Construction | Public Service | 540 Pier Ave | Remodel and renovate existing fire station | Completed |
| ~~104~~105 | Parking Lot D (CIP 682) | Parking lot | Manhattan Ave and 14th St | Redevelop a public parking lot | Pending |
| ~~105~~106 | Clark Building Renovations | Public Facilities | 861 Valley Dr | Renovate the existing Clark Building | Under Design |
| ~~106~~107 | City Yard Project (CIP 615) | Public Facilities | 555 6th St | Construction of a new City Yard | Pending |
| ~~107~~108 | Parking Lot A (CIP 695) | Infrastructure | 1101 Hermosa Ave | Improve existing parking lot and upgrade to meet ADA standards | Under Design |

**Table 3.0-3. Planned, Pending, Approved, and Recently Completed Projects in Hermosa Beach (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ~~08~~109 | Downtown Hermosa Beach Temporary Lane Configuration | Public Facilities | Hermosa Ave between 8th St and 14th St and Pier Ave between Hermosa Ave and Valley Dr | Temporary closure of driving lanes to facilitate more outdoor dining and retail areas, addition of Class 2 bike lanes and ADA-accessible parking spots, to provide outdoor dining or shopping space during the COVID-19 pandemic | Approved |
| ~~109~~110 | Hermosa Ave Sewer Lining project | Infrastructure | Intersection of 6th St and Hermosa Ave | Sewer improvements | Project Closeout |
| ~~110~~111 | Hermosa Ave "Green Street" Project (CIP 164) | Infrastructure | Hermosa Ave between Herondo St and 4th St (possible extension to 6th St) | Implement Low Impact Development (LID) and green infrastructure on Hermosa Ave from 4th St to Herondo Ave, which will include a variety of green street design element | Under Design |
| ~~111~~112 | 10th St and Ardmore Repaving Project | Infrastructure | Intersection of 10th St and Ardmore | Repavement of roadway | N/A |
| ~~112~~113 | Concrete Bus Pad Landings | Infrastructure | Hermosa Ave | N/A | N/A |
| ~~113~~114 | Crosswalk restriping and Install Flashing Beacons | Infrastructure | Hermosa Ave (at 4th, 6th, 19th, 24th, and 25th St intersections) and at Herondo St and Monterey Blvd and the crossing in front of Clark Building on Valley Dr | Implement rectangular rapid flashing beacons and other measures at several uncontrolled pedestrian crossings | Under Design |

**Table 3.0-3. Planned, Pending, Approved, and Recently Completed Projects in Hermosa Beach (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ~~114~~115 | Pacific Coast Highway Traffic Improvements (CIP 112-160) | Infrastructure | Aviation Blvd / 10th St and PCH; Pier Ave / 14th St and PCH | Sidewalk repairs, ADA compliant curb ramps, additional crosswalk striping, and traffic signal modification | Underway |
| ~~115~~116 | Traffic Safety Demonstration Project | Infrastructure | Prospect Ave | Evaluation of existing traffic safety concerns along Prospect Ave and test and evaluate traffic calming and bicycle enhancements proposed the City's Bicycle Master Plan and the Safe Routes to School Program | Under Development |
| ~~116~~117 | Strand Bikeway and Walkway Improvements at 35th St (CIP 188) | Infrastructure | The Strand at 35th St | Improve bikepaths and walkway at the Strand at 35th St | Under Design |
| ~~117~~118 | Prospect Ave Curb Ramps (CIP 601 and 698) | Infrastructure | Prospect Ave | improvements and relocation of sidewalks, curb ramps and obstructions along Prospect Ave in order to comply with the ADA | Under Design |
| ~~118~~119 | Municipal Pier Structural Assessment and Repairs (CIP 660 629) | Infrastructure | Hermosa Beach pier | Electrical repairs and repairs of the municipal pier structural elements including the piles, pile caps, deck and the lifeguard storage room | Pending |
| ~~119~~120 | Emergency Operation Center | Public Facilities | N/A | Improvements to the City's | Under Design |

**Table 3.0-3. Planned, Pending, Approved, and Recently Completed Projects in Hermosa Beach (Continued)**

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| | Renovations (CIP 684) | | | Emergency Operation Center | |
| ~~120~~121 | Street Beach Restroom Construction (CIP 692) | Public Facilities | 14th St | Construct a new beach restroom facility along 14th St | Under Design |
| ~~121~~122 | Police Station Improvements (CIP 696) | Public Facilities | 540 Pier Ave | Improve security measures, restrooms, report writing room, evidence and property room at existing police station | Pending |
| ~~122~~123 | City Parks Restrooms and Renovations (CIP 669) | Public Facilities | 1102 6th St; 1870 Prospect Ave; 425 Valley Dr; 861 Valley Dr | Construct new and improve existing park bathrooms | Pending |
| ~~123~~124 | Council Chambers Audiovisual Improvements (CIP 672) | Public Facilities | Council Chambers | Replace audio visual equipment in the Council Chambers | Pending |

Note: Project locations depicted in Figure 3.0-1 are highlighted in blue within Table 3.0-4 and are located near the Project site. The Skechers Design Center and Offices Project is located across three sites, the latter two of which are located in the City of Manhattan Beach.
Sources: City of Hermosa Beach 2020a, 2020b, 2020c, 2020d, 2020e, 2020f.

Manhattan Beach

A list of pending, approved, recently constructed, and projects in Manhattan Beach within 3 miles of the Project site is included in Table 3.0-4. In addition to these projects the City have has adopted a number of ordinances (e.g., Ordinance No. 19-0007, amending the Manhattan Beach Municipal Code to strengthen the ban of short-term rentals, without exception). However, no construction would occur directly as a result of these ordinances and therefore potential impacts would not contribute to cumulative impacts associated with the proposed Project.

## Table 3.0-4. Planned, Pending, Approved, and Recently Completed Projects in Manhattan Beach

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| ***Archived Projects*** | | | | | |
| ~~124~~125 | Gelson's Market | Mixed-Use Commercial Building | 707 and 801 N Sepulveda Blvd | Redevelopment of a vacant automotive dealership/repair facility at 707 N Sepulveda Blvd into a food and beverage market with a secondary commercial building | Completed |
| ***Discretionary Projects Under Review*** | | | | | |
| ~~125~~126 | - | Residential | 116 16th St | 2,140-sf residence on 2,700-sf lot | Approved |
| ***CEQA Notices*** | | | | | |
| ~~126~~127 | - | Restaurant | 1142 and 1144 Manhattan Ave | Use Permit Amendment to expand the floor space of the existing Manhattan Beach Post into the adjacent space | Approved |
| ~~127~~128 | - | Commercial Building | 1100 N Sepulveda Blvd | Master Use Permit to construct a new 4,920-sf commercial building with a personal improvement service and a restaurant | Approved |
| ~~128~~129 | - | Commercial Building | 1120 N Sepulveda Blvd | Master Use Permit to construct a new 4,650-sf commercial building with a credit union and a restaurant | Approved |
| ~~129~~130 | - | Mixed-Use Hotel and Residential | 325 12th Place | Use permit for a mixed-use development consisting of a one-room hotel facilities on the first floor while maintaining the second floor as a residential use | Approved |

Note: Project locations depicted in Figure 3.0-1 are highlighted in blue within Table 3.0-4 and are located near the Project site.
Source: City of Manhattan Beach 2020.

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**Cumulative Projects in the Cities of Redondo Beach, Torrance, and Hermosa Beach**

**FIGURE 3.0-1**

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## 3.1 AESTHETICS AND VISUAL RESOURCES

This section of the Environmental Impact Report (EIR) discusses the potential environmental effects of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) on aesthetics and visual resources as defined by the California Environmental Quality Act (CEQA), but with consideration of the regulations, policies, and design guidelines of the City of Redondo Beach and City of Torrance. This analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x, architects and visual simulation specialists, for the Phase 1 preliminary site development plan as well as representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. These photosimulations and representative views were reviewed in the context of the development standards under the Redondo Beach and Torrance General Plans and municipal codes. Additionally, based on the comments received during the 30-day public scoping period, this discussion also includes an analysis of potential impacts related to shading of adjacent shadow-sensitive uses. A shade and shadow study was prepared to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M). Under CEQA, aesthetic impacts are qualitative in nature, and generally occur where physical change would conflict with adopted development standards and would substantially degrade the visual character or quality of public views of the site and its surroundings.

### 3.1.1 Environmental Setting

Definitions of Visual Resources

Most communities identify scenic resources as important assets through designation of scenic vistas or significant visual resources in the General Plan; however, specific valued scenic resources vary by community or the particular urban or rural context. For example, in an urban setting, scenic resources can be unique or architecturally recognized buildings as well as important features that contribute to community character and identity, such as street trees, plazas, parks, open space, and public art.

The natural environment plays an important role in defining the visual setting, even for an urban community. In such cases, regionally recognized natural features may contribute to an urban community's aesthetic character and visual quality, including but not limited to:

- Mountain peaks or ridgelines;
- Oceans or other water bodies;
- Beaches and dunes;

- Bluffs or cliff faces;
- Large expanses of open sky open or green spaces of scenic value; and
- Unique geologic features or formations.

In an urban context, view corridors often extend along city streets and may include foreground views of street trees, architecturally notable structures, and the urban streetscape backed by more distant views of the ocean or mountains.

Visual Resources within the Vicinity of the Project Site

Redondo Beach has a wide range of visual resources including views of the Pacific Ocean and wide sandy beaches along the coast, views of the Palos Verdes hills to the south, views of the San Gabriel Mountains to the east, and panoramic views of the South Bay and inland region from highpoints within the City. The Redondo Beach General Plan Parks and Recreation Element calls for the preservation and enhancement of unique and valuable community resources including significant scenic and visual resources (see Policy 8.2a.8 in Table 3.1-2), but does not identify any specific scenic vistas or scenic view corridors within the City. However, areas with scenic qualities (e.g., distant scenic views of the ocean or mountains) in Redondo Beach include King Harbor, the Redondo Beach Pier, Hopkins Wilderness Park, and other high points of the City that provide wide-ranging panoramic views.

*Hopkins Regional Park, which is located approximately 2 miles south of the campus, is a 11-acre park~~ing~~ that includes natural vegetation, streams, campground, and day use facilities. The park provides scenic panoramic views of the Palos Verdes hills to the south.*

The rolling topography of Torrance creates many scenic vistas throughout the City. The distant San Gabriel Mountains are visible from the hillsides along the City's western and southern boundaries. Additionally, the hillsides of the Riviera neighborhood provide expansive views of the Pacific Ocean. The Torrance General Plan Community Resource Element has designated scenic view corridors along Torrance Boulevard between Madrona Avenue and Western Avenue, along Engracia Avenue and Marcelina Avenue, and further south within the Palos Verdes hills.

The Project site is located approximately 1 mile east of the Pacific Ocean, along the border of Redondo Beach to the west and Torrance to the east. The rolling topography and the low-rise development immediately adjacent to the Project site block distant views of the ocean from this

location; however, distant views of the Palos Verdes hills are available from some portions of the site to the south. The Project site is bounded by North Prospect Avenue to the southwest, Diamond Street to the southeast, Flagler Lane and Flagler Alley to the east, and Beryl Street and existing commercial development to the north. The close-up views of urban and suburban development provided along these roadways are described in detail below:

*North Prospect Avenue*

North Prospect Avenue is a north-south street with four vehicle lanes separated by a raised center median. The sidewalk along the eastern side of the street is approximately 8 feet wide and is interrupted by wooden utility poles and overhead utilities as well as streetlights. There is a small frontage road along the west side of the street providing access to the 1- to 2-story single-family homes between Diamond Street to the south and Beryl Street to the north. This frontage road is separated from North Prospect Avenue by a large 6- to 8-foot-tall hedge, which obscures views of the campus. A similar frontage road is located on the eastern side of the street, between Diamond Street and Del Amo to the south. The residences along North Prospect Avenue include a variety of architectural styles (e.g., American craftsmen, ranch-style, modern, and colonial), but are generally less than 2 stories tall. The only exception in the immediate vicinity of the campus is the four-story multi-family residence on the corner of North Prospect Avenue and Beryl Street and the campus itself. Views from North Prospect Avenue generally include a rolling topography with low-rise development, landscaped trees and shrubbery, and open sky.

*Immediately across from the campus, single family residential homes are set back from North Prospect Avenue along a small frontage road separated by a 6- to 8-foot-tall hedge.*

*Beryl Street is most narrow along its border with the Dominguez Park. This portion of Beryl Street provides two vehicle lanes, Class II (i.e., striped) bicycle lanes, and sidewalks interspersed with mature trees.*

*Beryl Street*

Beryl Street is a four-lane road that runs north-south from its northern terminus at 190th Street and then east-west along the eastern and southern borders of Dominguez Park before turning northeast-southwest at North Prospect Avenue until its southern terminus at North Harbor Drive. Beryl Street runs in an east-west direction adjacent to the Redondo Village Shopping Center and the vacant Flagler Lot. Beryl Street provides two eastbound lanes, one westbound lane, and a center turn lane for vehicles entering and exiting the Redondo Village Shopping Center. East of Flagler Lane, Beryl Street provides two vehicle lanes and narrower, approximately 6-foot-wide pedestrian sidewalks along both sides of the street from Flagler Lane to 190th Street. On the north side of the road along the southern boundary of Dominguez Park, Beryl Street supports bronze loquat trees (*Eriobotrya deflexa*). Utility lines also border the north side of the street. West of Flagler Lane, there are no bicycle lanes along either side of Beryl Street. Various street trees line both sides of the roadway, including bronze loquat trees, Indian laurel fig trees (*Ficus macrocarpa*), and Saint Mary magnolias (*Magnolia grandiflora*). Beryl Street supports a variety of single-family and multi-family residential, commercial (e.g., Redondo Village Shopping Center, Redondo Shores Shopping Center), and public institutional uses (e.g., Dominguez Park, Towers Elementary School). Beryl Street provides views of the developed hilly landscape and open sky. Views of the marina are present where Beryl Street becomes Portofino Way at its intersection with Harbor Drive; however, the marina is not visible within the immediate vicinity of the Project site.

*Flagler Lane*

To the northeast, the Project site is bounded by Flagler Lane, a two-lane road that widens from 26 feet to approximately 62 feet along the western border of Dominguez Park between Anita Street and Beryl Street to provide a center left-turn lane and on-street parking. Flagler Lane includes approximately 8-foot-wide pedestrian sidewalks. It supports mostly low-density multi-family residential uses with few public institutional uses (e.g., Dominguez Park, Jefferson Elementary School) and a commercial plant nursery at the southeast corner of Flagler Lane and 190th Street. These buildings vary in scale, ranging from 1 to 4 stories. Between Beryl Street and Towers Street,

*Flagler Lane follows the hilly topography in the area. The intersection of 190th Street & Flagler Lane provides distant wide-ranging panoramic views of the campus against the backdrop of the Palos Verdes hills.*

Flagler Lane supports single-family residences within the City of Torrance adjacent to the east of the Project site. Adjacent to the north of the Project site, Flagler Lane supports medium-density multi-family residential buildings to the west and Dominguez Park to the east. Within Dominguez Park are two historic structures: the Morrell House listed in the National Register of Historic Places (NRHP), and the Queen Anne House locally designated by the City of Redondo Beach (see Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Large electrical towers and power lines run east-west across Flagler Lane, immediately south of 190th Street. Other views along Flagler Lane include developed rolling hills and the open sky above.

*Flagler Alley*

Flagler Alley is an approximately 15-foot-wide and 500-foot-long public alleyway that provides two-way northbound-southbound connectivity between Flagler Alley to the north and Diamond Street to the south. Flagler Alley is closed off to vehicular travel by an existing wooden post roadblock at the southern terminus of Flagler Lane and a chain-link fence at the northern terminus of Diamond Street. No formal pedestrian or bicycle facilities exist along Flagler Alley; however, this alleyway is generally used by pedestrians and bicyclists traveling to and from Dominguez Park and Towers Elementary School. Views are channelized along the alleyway. A steep slope supported by low-lying vegetation, trees, and wooden supporting walls creates a barrier between the alley and the eastern perimeter of the campus. A concrete wall separates the alley from the backyards of the single-family residences to the east in Torrance. Wooden utility poles and electrical lines extend along the pedestrian sidewalk on the eastern side of the alley. Views of the open sky are generally limited due to the steep slope and hillside vegetation. No lighting is provided along the alleyway.

*Flagler Alley provides views of the vegetated slope along the eastern boundary of the Project site for pedestrians and bicyclists traveling along the alleyway.*

*Diamond Street*

To the southeast, the Project site is bounded by Diamond Street~~,~~. Northeast of North Prospect Avenue, Diamond Street is a two-lane cul-de-sac with center median divider providing access to six single-family residences. Views of the Project site from the residences along the Diamond Street cul-de-sac – namely the medical office buildings located at 510 North Prospect Building and 512 North Prospect Building – are largely obstructed by existing trees and vegetation along the Project sites southeastern slope. Southwest of North Prospect Avenue, Diamond Street is a three-lane roadway with one lane in each direction and a center left-turn lane. Diamond Street includes approximately 5-foot-wide pedestrian sidewalks lined with mature eucalyptus (*Eucalyptus* spp.) and palm trees. Diamond Street supports single-family residential, low-density multi-family residential, and ~~several schools, including the Redondo Beach Learning Academy, Redondo Union High School, and Redondo Beach High School~~Redondo Union High School. Due to the rolling topography and large street trees, intermittent views of the open sky and Pacific Ocean are visible from Diamond Street southwest of North Prospect Avenue.

*The Pacific Ocean is partially visible from segments of Diamond Street (west of North Prospect Avenue), which varies in elevation.*

*The pedestrian environment in the Project vicinity is characterized by relatively narrow (i.e., 5 to 8 feet wide) pedestrian sidewalks that are interrupted by wooden utility poles, pedestrian crosswalks at intersection, and the pedestrian- and bicycle-only Flagler Alley immediately east of the Project site.*

In summary, the visual character in the vicinity of the Project site is dominated by single-family and multi-family residential buildings, scattered with schools, parks, neighborhood-serving

commercial uses (e.g., restaurants, grocery stores, etc.), and surface parking lots. Taller buildings near the Project include a 4-story multi-family residential ~~buildings~~building between Beryl Street and Agate Street. ~~These structures~~This structure generally extends up to 52 feet in height. Additionally, street trees along Beryl Street and Flagler Lane/Flagler Alley and the developed hilly topography add to the visual character of the vicinity and can partially obstruct views of the Project site from the residential units in these surrounding neighborhoods.

Sidewalks on North Prospect Avenue, Beryl Street, Flagler Lane, Flagler Alley, and Diamond Street bordering the Project site range between 5 to 8 feet wide and generally provide adequate unobstructed passage for pedestrians. Beryl Street supports intermittent street trees, including bronze loquat trees, Indian laurel fig trees, and Saint Mary magnolias, up to 20 feet tall. Large mature trees line Flagler Lane and Flagler Alley along the Project site frontage, with average heights of approximately 20 to 25 feet. In the vicinity of the proposed Project, parallel parking is allowed on both sides of Beryl Street and the east side of Flagler Lane and Diamond Street. These on-street parking spaces create buffers between vehicular traffic and pedestrians using sidewalks on these streets, contributing to a comfortable pedestrian environment.

Project Site

The Project site has approximately 765 feet of frontage along North Prospect Avenue, 150 feet of frontage along Beryl Street, 450 feet of frontage along Flagler Lane, 500 feet of frontage along Flagler Alley, and 230 feet of frontage along Diamond Street. The Project site is currently occupied by 1- to 5-story buildings and surface parking lots. Existing development includes the Beach Cities Health Center and an attached maintenance building located at 514 North Prospect Avenue, two medical office buildings located at 510 and 520 North Prospect Avenue, and a parking structure with 3 above ground levels located at 512 North Prospect Avenue (refer to Figure 2-3). The Beach Cities Health Center and two medical offices face North Prospect Avenue, and are accessed from three driveways – a central driveway and two secondary driveways along North Prospect Avenue. A subterranean parking structure is also located below the western portion of the campus with an entrance near the central driveway off of North Prospect Avenue. The buildings on the Project site are similar in terms of architectural design, colors, style, and landscaping, with the exception of the above ground parking structure. For example, the external façades of the Beach Cities Health Center and medical office buildings are finished in white paint with black/blue-tinted windows that form horizontal stripes across the building façades. The North Prospect Avenue frontage is lined with landscaped grass, short shrubs, and hedges interspersed with mature trees.

The Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) is the northernmost building on campus, which is set back approximately 120 feet from the

pedestrian sidewalk along North Prospect Avenue. The structure is an improved 3-story medical office building with a white façade and tinted black windows. A sign across the front of the building reads *"Providence Little Company of Mary Medical Institute"* in large blue letters. Above the first floor of the building, a blue *"Pharmacy"* sign and red *"Urgent Care"* sign are located on either side of the main entrance, which faces North Prospect Avenue. The building has approximately 200 feet of frontage along North Prospect Avenue and is landscaped with trees along the north and west sides of the building facing the interior of the campus.

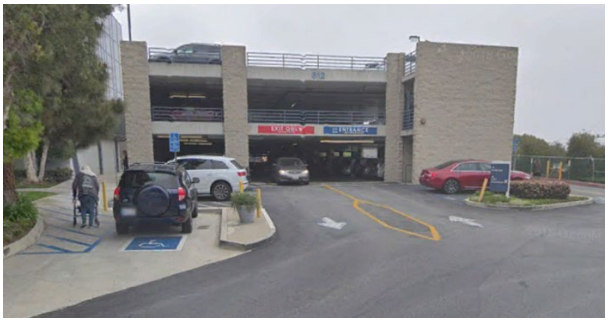
The Beach Cities Health Center (514 North Prospect Avenue) is set back approximately 130 feet from the pedestrian sidewalk on North Prospect Avenue near the central driveway. The 5-story structure and associated maintenance building are both finished with white paint. Tinted black/blue windows create horizontal stripes across the building façade. The south tower of the building includes balconies that face North Prospect Avenue to the west. Palm trees of varying heights border this portion of the building. The fourth and uppermost floor of the south tower includes a trellis and outdoor patio that also faces North Prospect Avenue to the west. Atop the south tower, a metal parapet structure (i.e., elevator shaft) reaches up to a height of 76 feet above the existing campus ground level. The main entrance to the Beach Cities Health Center is covered by a tinted glass arched walkway. Large signs that read *"Beach Cities Health Center"* and *"Silverado"* run across the western façade of the building. Manicured grass and mature trees intermittently border the remainder of the building.

The Beach Cities Advanced Imaging Building (510 North Prospect Avenue), located adjacent and immediately south of the Beach Cities Health Center, is the nearest campus building to North Prospect Avenue with a setback of approximately 25 feet from the pedestrian sidewalk. The Beach Cities Advanced Imaging Building is a V-shaped building with an interior paved courtyard. Similar to the Providence Little Company of Mary Medical Institute Building and Beach Cities Health Center, the 3-story building is also painted white with black/blue-tinted windows that extend horizontally across the building façade. The portion of the building that faces the interior

*The white façade with tinted black windows of the Beach Cities Health Center and other medical use buildings on the campus are distinctive feature unique to the campus.*

of the campus (i.e., not visible from North Prospect Avenue) is entirely covered with black tinted windows. Manicured grass and mature trees border western, southern, and eastern sides of the building fronting North Prospect Avenue.

The above ground parking structure (512 North Prospect) is attached to the north side of the Beach Cities Advanced Imaging Building and is located immediately east of the Beach Cities Health Center south tower and south of the north tower. The parking structure has three above ground levels and, which are supported by vertical columns of tan concrete bricks and blue horizontal metal railings. The sides of the structure provide screening for vehicle headlights, but are otherwise open to the outside.



*The above ground parking structure is the only building on the campus that is not finished in white paint.*

As described in further detail below, the existing topography of the campus as well as the height, style, and color of the existing buildings on the campus, make it visually distinct from the surrounding low-rise suburban development. The former South Bay Hospital was originally constructed in 1958 and as such, this visual distinction has been present for over 60 years throughout the development of residential uses over the years.

Existing Public Views of the Project Site

Public views of the Project site are generally confined to those available from immediately adjacent streets, sidewalks, and Dominguez Park. Views from streets even one block away are obscured by intervening structures. For example, ~~views from Sunnyglen Park are completely blocked by intervening 1- to 2-story single family residences and neighborhood serving commercial development~~views of the existing campus from Sunnyglen Park are partially or completely blocked in some locations (e.g., at the northwest corner of the park) by intervening 1- to 2-story single family residences and neighborhood serving commercial development. Views of the existing buildings and surface parking lots on-site from North Prospect Avenue, Beryl Street,

*Views of the existing development on the campus from the public road at the northeast corner of Sunnyglen Park are obstructed by existing residential development and landscaping.*

Dominguez Park, Flagler Lane, and Diamond Street are generally uninterrupted and only sometimes partially obscured by street trees, other landscaping, utility infrastructure (e.g., wooden poles and electrical lines), and traveling cars.

*The Project site is visible from several points along Flagler Lane including from its intersection with 190th Street (left) and from Dominguez Park (right) directly northeast of the Project site.*

Views of the Project site from public areas include Dominguez Park, North Prospect Avenue, Beryl Street, Flagler Lane, Flagler Alley, Diamond Street, and the residential neighborhood to the east of the site in Torrance (e.g., Towers Street, Tomlee Avenue, etc.) (see Figure 3.1-1). The 765 feet of frontage along North Prospect Avenue offers the most complete and extensive views of the Project site between the north driveway looking south and Diamond Street looking north. The Beryl Street and Flagler Lane frontages also provide views across the Project site by motorists, bicyclists, and pedestrians. The Project site is partially visible from two historic buildings (i.e., the Morrell House and the Queen Anne House) at Dominguez Park, along Flagler Lane. The Hibbard House at 328 North Gertruda Avenue and a house at 820 Beryl Street are historic architectural resources located approximately 0.43 miles and 0.23 miles from the Project site, respectively (see Section 3.4, *Cultural Resources and Tribal Cultural Resources*); however, the Project site is not visible from these landmarks.

Views of the Project site from identified representative views, which were selected in coordination with the City of Redondo Beach, are further described below. The locations of these representative views are shown in Figure 3.1-1.

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**Representative View Locations**

**FIGURE 3.1-1**

*Representative View 1: Tomlee Avenue (Facing West)*

This represents a west-facing view of the Project site from the residential neighborhood within Torrance. This specific viewpoint is located approximately 230 feet to the east of the campus along Tomlee Avenue. Several of the 1- and 2-story single family homes along Tomlee Avenue abut an approximately 8- to 10-foot-tall concrete wall that forms Flagler Alley to the west. Views of the Project site from the public realm in this location are limited due to the intervening single-family homes and associated landscaping in the foreground and the eastern slope of the campus. The upper levels and rooftop projections of the North Tower and South Tower of the Beach Cities Health Center are visible from this location. Open sky is visible above the rooftop of the single-family residences and Beach Cities Health Center.

*Representative View 1: Tomlee Avenue (Facing West)*

*Representative View 2: Flagler Lane & Towers Street Intersection (Facing West)*

Similar to Representative View 1, this view also represents a west-facing view of the Project site from the intersection of Flagler Lane and Towers Street within the single-family residential neighborhood to the east of the campus in Torrance. This view was selected because it represents the view of the steep grade, retaining walls, and landscaped vegetation along the eastern border of the Project site, which is visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street. Given the central location of the Beach Cities Health Center and the two medical offices, none of the existing buildings on the campus are visible from this location. The only visible buildings are residential development along Beryl Street, including the 4-story multi-family residential building located at the intersection of Beryl Street & Flagler Lane along the north (i.e., right) side of the view. Views of the open sky above the steep slope are

interrupted by tall trees on the hillside and a couple of lamp posts providing security lighting in the adjacent BCHD surface parking lot. At the bottom of the vegetated slope is a chain link fence and a concrete brick retaining wall along the west side of Flagler Lane. A streetlight illuminates the intersection of Flagler Lane & Beryl Street on the east (i.e., right) side of this view. Additionally, the street sign for the Flagler Lane & Towers Street intersection as well as a *"No Parking"* sign are also visible in the foreground.

*Representative View 2: Flagler Lane & Towers Street Intersection (Facing West)*

*Representative View 3: Flagler Lane & Beryl Street Intersection (Facing Southwest)*

This represents a southwest-facing view of the Project site as seen by motorists, bicyclists, and pedestrians along Beryl Street at its intersection with Flagler Lane. This location affords a view of the vacant Flagler Lot in the foreground, which is bordered by a black wrought iron fence along the western, northern, and eastern borders of the lot. The northern portion of the lot is covered with gravel and is level with Beryl Street; however, the southern portion of the lot supports grass and weedy vegetation and slopes up by approximately 30 feet to the elevation of the campus. The southern perimeter of the vacant Flagler Lot, which borders the northern surface parking lot on campus, is lined with bushy trees that block views of the parked cars and lower levels of the Beach Cities Health Center and Providence Little Company of Mary Medical Institute Building. Views of the Beach Cities Health Center are also partially blocked by landscaped trees surrounding the building. However, the upper levels of the Beach Cities Health Center and Providence Little Company of Mary Medical Institute Building are visible in the background from this location. The eastern façade of Redondo Village Shopping Center and associated surface parking lot can be seen

along the west (i.e., right) side of this view. Flagler Lane and the vegetated slope along the eastern border of the Project site can be seen along the eastern (i.e., left) side of this view. Views of the Project site, including the campus and the vacant Flagler Lot, are interrupted by electrical lines, wooden utility poles, the green security lights within the commercial parking lot, and the traffic signal light at the southwest corner of the Flagler Lane & Beryl Street intersection.

*Representative View 3: Flagler Lane & Beryl Street Intersection (Facing Southwest)*

*Representative View 4: Beryl Street & Harkness Lane Intersection (Facing South)*

This view represents a south-facing view of the surface parking lot and commercial uses at the Redondo Village Shopping Center, with the Beach Cities Health Center and Providence Little Company of Mary Medical Institute Building visible in the background due to the higher elevation of the campus. This view is located at the intersection of Beryl Street & Harkness Lane, approximately 290 feet north of the Project site. The roadway and pedestrian crosswalks at the intersection are visible in the foreground. The mid-ground provides views of the commercial uses at the Redondo Village Shopping Center, including a Vons grocery store, and associated surface parking lot, which is full of parked cars as is typical during the daytime and evening hours. Views of the shopping center and parking lot are interrupted by streetlights along the southern sidewalk of Beryl Street. The commercial shopping center is a 1-story structure covered with tan bricks and concrete and an orange tile roof. Large windows and colorful signs make up the front façade of many of the commercial uses within the shopping center. The parking lot is interspersed with green

security lights. Street trees up to 25 feet in height are interspersed within the vegetated medians throughout the parking lot.

*Representative View 4: Beryl Street & Harkness Lane Intersection (Facing South)*

*Representative View 5: North Prospect Avenue and Central Driveway Intersection (Facing Northeast)*

This location provides a northeast-facing view of the Project site from North Prospect Avenue at its intersection with the central driveway into the campus. The Beach Cities Health Center, Beach Cities Advanced Imaging Building, and the Providence Little Company of Mary Medical Institute Building are visible across this view. Views of the buildings are partially obstructed by the landscaped trees. Along the foreground of the view, the roadway intersection is visible with one pedestrian crosswalk across North Prospect Avenue. Traffic signal and streetlights are visible at the corners of this intersection along the Project site boundary. Wooden utility poles on the pedestrian sidewalk of North Prospect Avenue support power lines that run above the east side of

*Representative View 5: North Prospect Avenue and Central Driveway Intersection (Facing Northeast)*

the street. Views of the open sky are limited from this view due to the height of the existing buildings, large trees, streetlights, and overhead powerlines.

*Representative View 6: Flagler Lane & 190th Street Intersection (Facing South)*

This view represents a south-facing view of the Project site from the intersection of Flagler Lane and 190th Street. Although this view is located approximately 1,155 feet north of the Project site with intervening structures and vegetation, this location affords a distant, relatively unobstructed view of the Beach Cities Health Center and Providence Little Company of Mary Medical Institute Building. This is due in part to the elevation of the viewing location as well as the elevation of the campus and the height of the existing buildings on the campus. (While other distant views are available – including the view from Prospect & 190th Street – these views are partially obstructed by existing development.) The majority of the distinctive white campus buildings with black/blue tinted windows are visible below the ridgeline of the Palos Verdes hills in the background. The Palos Verdes hills are visible, uninterrupted across nearly the entire field of vision. Additionally, blue sky is visible above the Palos Verdes ridgeline, but is interrupted by several power lines crossing east-west immediately south of the view. Flagler Lane is visible in the foreground with cars parked parallel along the west side of the street and diagonally along the east side of the street. At the southwest corner of the Beryl Street and 190th Street intersection, a commercial plant nursery provides an abundance of green vegetation on the west (i.e., right) side of the foreground. Additionally, one electrical line runs north-south along the west side of Flagler Lane. The eastern (i.e., left) side of the view is framed with a chain-link fence on the east side of Flagler Lane, as well as green trees and other vegetation.

*Representative View 6: Flagler Lane & 190th Street Intersection (Facing South)*

Light and Glare

Light impacts occur during the evening and nighttime hours and can have adverse effects if they affect views. Glare is largely a daytime phenomenon, occurring when sunlight is reflected off highly polished surfaces or objects (e.g., windows, windshields, etc.), light-colored surfaces, or by vehicle headlights on adjacent roadways. Excessive glare not only restricts visibility but can also increase the ambient heat reflectivity in each area.

The Project site is located in an area with nighttime lighting characteristic of urban and suburban settings, including interior building illumination, streetlights, exterior security lighting, and vehicle lights. Adjacent commercial and residential buildings include both indoor and outdoor illumination of façades, along with indoor illumination of windows, balconies, and exterior lighting fixtures. Indoor lighting is generally confined within the existing buildings and does not spill into the public realm. Outdoor lighting sources include exterior light fixtures, which range from small fixtures from nearby residences to illuminated signs for the Vons and Shell gas station north of the site. Streetlights illuminate the sidewalks along both sides of North Prospect Avenue, the south side of Beryl Street, the east side of Flagler Lane, and the raised center media on Diamond Street.

Sources of nighttime light on the Project site include the security lighting on-site located around the perimeter of the north and west surface parking lots as well as the above ground parking structure at 512 North Prospect Avenue. Direct light from vehicle headlights within the surface parking lots located on the Project site also create light sources at the Project site and surrounding uses. However, due to the Beach Cities Health Center's hours of operation (i.e., 9:00 a.m. to 5:00 p.m.) nighttime lighting from vehicles is limited at the Project site.

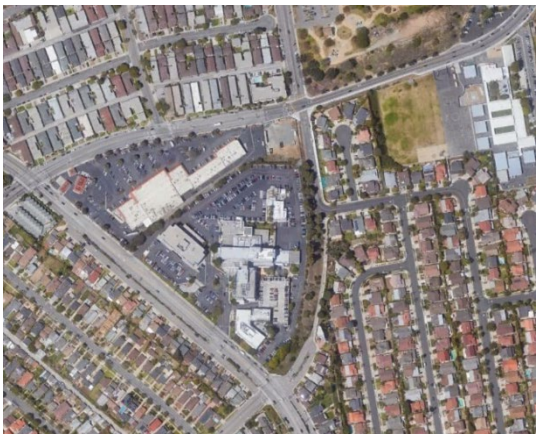
Potential sources of glare at the Project site include the windows and façades of light-colored structures on the Project site. For example, the Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building generate glare at certain viewing locations due to reflective glass surfaces on all sides of the buildings.

Land uses that are typically sensitive to excess light and glare include residential uses, parks, senior housing, and other types of uses where excessive light and glare may disrupt sleep or other activities. In addition, light and glare may interfere with the vision of drivers. Existing light-sensitive receptors in the area include nearby residences, including single-family residences along North Prospect Avenue, Flagler Lane, Flagler Alley, and Diamond Street, and multi-family residences along Beryl Street. Dominguez Park to the northeast of the Project site could also be considered a sensitive receptor to light and glare generated from the Project site.

*The Beach Cities Advanced Imaging Building is a source of illumination and glare due to the reflectivity of its glassy façade; however, this portion of the building faces the interior of the Project site and is not directly visible from North Prospect Avenue or Diamond Street below.*

Shadow-Sensitive Uses in Project Vicinity

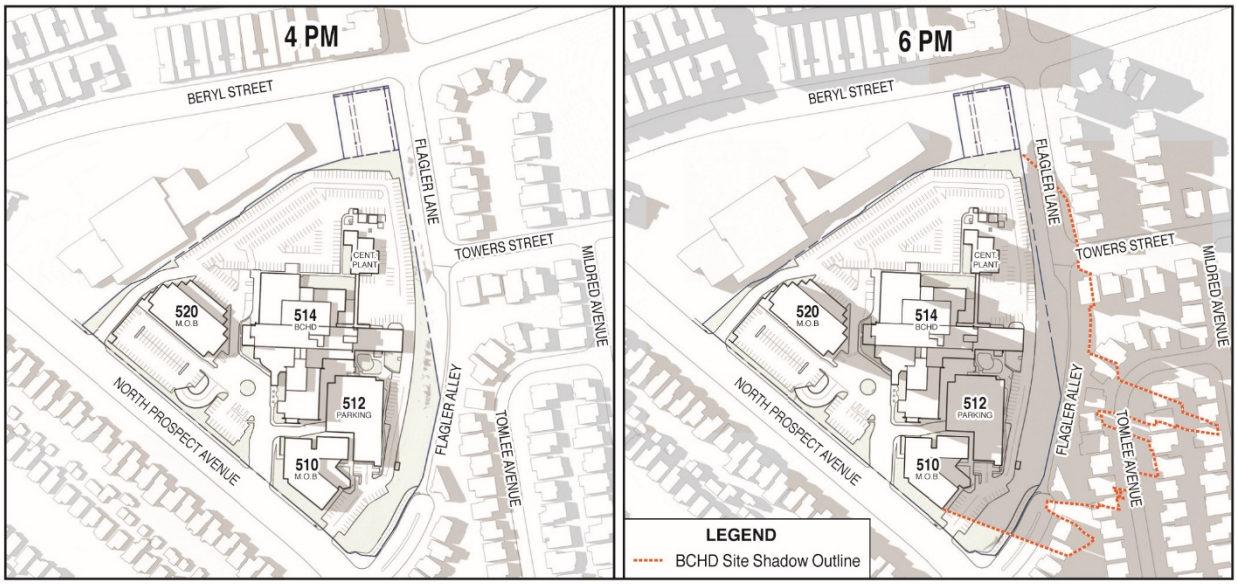
Uses may be considered sensitive to shade and shadow effects if they require or are otherwise dependent on sunlight for regular function, comfort, or commerce. Land uses and operations sensitive to the effects of shading include, but are not necessarily limited to, residential, recreational, and institutional (e.g., schools, nursing homes, etc.), as well as some public outdoor spaces, such as parks, restaurants with outdoor seating areas, plant nurseries, and existing solar collectors. The consequences of shadows on land uses may be positive, including cooling effects during warm weather, or negative, such as shading of exterior patios, the loss of natural light access, solar access energy generation purposes, or the loss of warming influences during cool weather. While some incidental shading on shadow-sensitive uses is commonly acceptable to provide relief from the sun, shading that occurs over extended periods of time can be considered a detriment.



*The Project site is surrounded by shadow-sensitive residential uses, such as the residences immediately east of the Project site and Towers Elementary School within Torrance.*

The proposed Project site is located near several shadow-sensitive uses, including the adjacent single- and multi-family residences along North Prospect Avenue, Beryl Street, Flagler Lane, Tomlee Avenue, and Diamond Street. These residential uses feature windows and balconies allowing natural lighting of indoor living spaces and private individual outdoor living spaces. Dominguez Park located adjacent to and northeast of the Project site, and Towers Elementary School, located approximately 300 feet east of the Project site, are also considered shadow-sensitive uses. The nearest solar collectors to the Project site are the small solar panels atop a few residences in the Torrance neighborhood, located to the east as near as approximately 200 feet from the Project site, and in the Redondo Beach neighborhood to the southwest, approximately 475 feet from the Project site. No existing solar collectors are located within the immediate vicinity of the Project site.

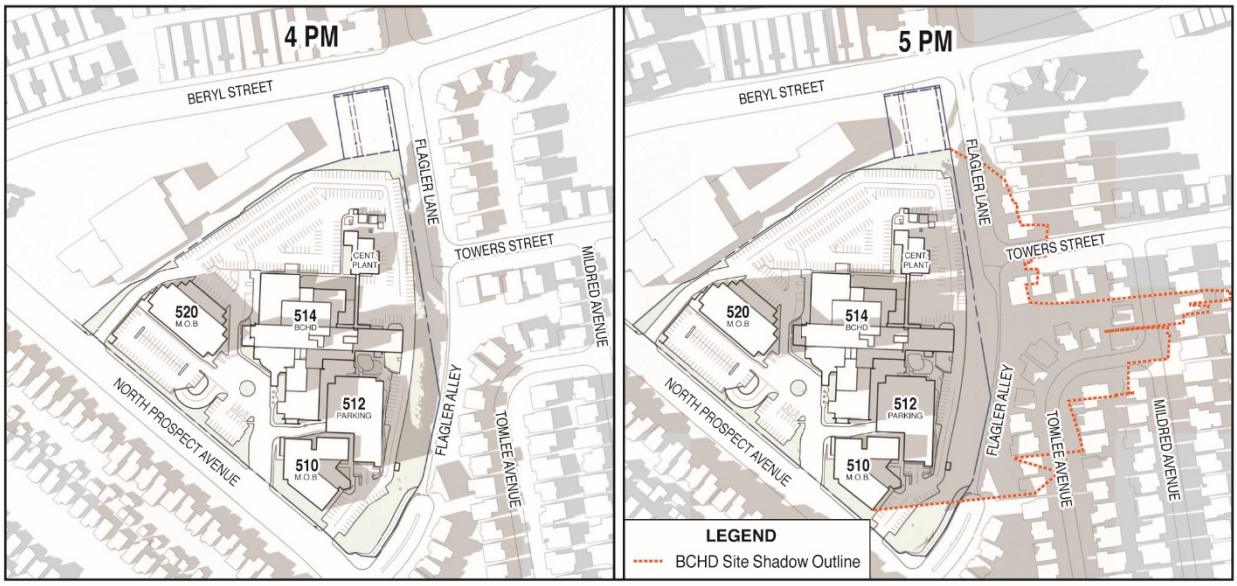
As depicted in the shade and shadow study prepared for the proposed Project (see Appendix M), the 5-story Beach Cities Health Center, which is the tallest building on campus, casts the greatest amount of shade on the shadow-sensitive residences to the east and north of the Project site. This shading primarily occurs in the evenings (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter) and generally affects the rows of single-family residences nearest the Project site. The shadows are longest during the Winter during which time the Beach Cities Health Center also casts shade over Towers Elementary; however, this shading occurs at 4:00 p.m. or later, after the students are dismissed from class. Additionally, the sun sets near 5:00 p.m. during the Winter making the total duration of the maximum shading less than 1 hour.




wood.

**Existing Summer Solstice**

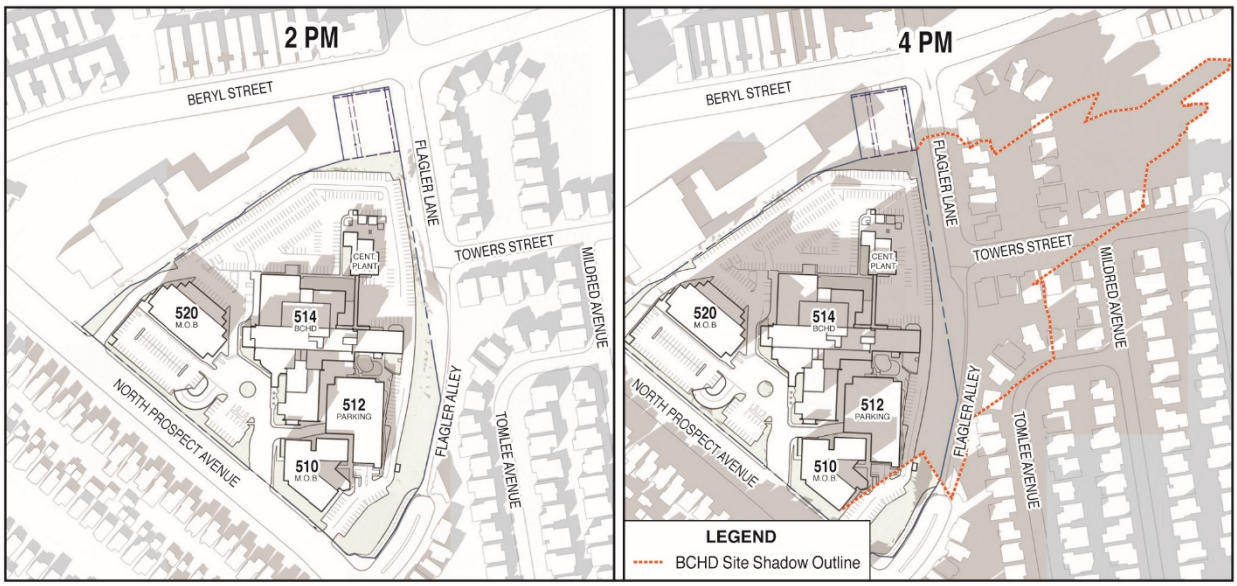
**FIGURE 3.1-2**




wood.

**Existing Fall Equinox**

**FIGURE 3.1-3**




wood.

**Existing Winter Solstice**

**FIGURE 3.1-4**

### 3.1.2 Existing Regulatory Setting

State Policies and Regulations

*Caltrans Scenic Highway Program*

The California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public rights-of-way that traverses an area of exceptional scenic quality. Suitability for designation as a State Scenic Highway is based on vividness, intactness, and unity. The Pacific Coast Highway, located approximately 0.5 miles to the west of the Project site, is eligible for State Scenic Highway designation; however, it is not currently designated as scenic by the State (Caltrans 2019).

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Land Use Element*

The portion of the Project site within Redondo Beach is designated P (Public or Institutional) land use within the Redondo Beach General Plan (City of Redondo Beach 2008). Because this designation allows a variety of land use types with a variety of characteristics, the Redondo Beach General Plan Land Use Element does not establish specific development standards for Public or Institutional land uses. Rather the Land Use Element defers establishment of specific development standards for the Public/Institutional designation to the Conditional Use Permit (CUP) process in the Redondo Beach Zoning Ordinance (Redondo Beach Municipal Code [RBMC] Section 10-2.100; see *Redondo Beach Zoning Ordinance* below). However, goals and policies within the Land Use Element relate to aesthetics, visual character, and visual quality. The most pertinent goals and policies are provided below, and consistency with these goals and policies is analyzed in Section 3.10, *Land Use and Planning*.

Goal 1K: Provide for public uses which support the needs and functions of the residents and businesses of the City.

Goal 1N: Ensure a high quality of the City's built environment, architecture, landscape, and public open spaces and sidewalks.

Objective 1.46: Provide for the continuation of existing and expansion of governmental administrative and capital, recreation, public safety, human service, cultural and educational, infrastructure, and other public land uses and facilities to support the existing and future population and development of the City.

Policy 1.46.4 Establish standards for the City and coordinate with other public agencies to ensure that public buildings and sites are designed to be compatible in scale, mass, character, and architecture with the existing buildings and pertinent design characteristics prescribed by this Plan for the district or neighborhood in which they are located.

Policy 1.46.5 Require, where the City has jurisdiction, that public sites be designed to incorporate landscaped setbacks, walls, and other appropriate elements to mitigate operational and visual impacts on adjacent land uses.

Objective 1.53: Attain residential, commercial, industrial and public buildings and sites which convey a high-quality visual image and character.

Policy 1.53.6 Require that on-site parking structures be designed as an integrated component of the building's architectural design character; including the incorporation of elements which continue and reinforce the architectural design of the primary structure and convey the visual *"sense"* of an occupied building (use of windows, arcades, overhangs, entries, recessed walkways, spandrels, articulated columns and rooflines, and other elements).

Policy 1.53.10 Require that all building facades visible from public streets and abutting properties be designed to continue the architectural character established for the street facing elevations.

Policy 1.53.11 Require that air conditioning and other mechanical equipment located on the rooftop of a structure be visually screened from public viewing areas and adjacent residential properties.

~~*Redondo Beach General Plan Parks and Recreation Element*~~

~~The Redondo Beach General Plan Parks and Recreation Element sets forth policies and implementation measures to enhance the unique characteristics of the City and its coastline. Such policies support ongoing maintenance and facilitate expansion and improvement of parkland, recreational facilities, and programs.~~

~~Policy 8.2a.8 Preserve and enhance unique and valuable community resources as part of the planning and development of parks and recreation areas. Such resources include significant scenic and visual~~

~~resources; cultural/historic resources; and natural resources such as water features, wildlife habitats, and native vegetation.~~

*Redondo Beach Zoning Ordinance*

The Redondo Beach Zoning and Land Use Code (RBMC Section 10-2.100 through Section 10-2.2520) sets forth specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, sign regulations, and open space and setback requirements. The official districting map for the Zoning and Land Use Code designates the Project site as being zoned as Community Facility (P-CF). The Redondo Beach Zoning and Land Use Code does not include specific development standards for buildings within the P-CF zoning district. Rather, the ordinance establishes that development standards for the Floor Area Ratio (FAR), building height, number of stories, and building setbacks shall be determined subject to Planning Commission Design Review.

As required by RMBC Section 10-2.2502, Redondo Beach Planning Commission Design Review is required for all new construction, additions, or remodel of an existing building in all zones except Waterfront (W) and Catalina Corridor (CC). As required by the Planning Commission Design Review, projects within the City would be required to meet the City's standards regarding site design and architecture. As stated, the purpose of the Planning Commission Design Review is *"to ensure compatibility, originality, variety, and innovation in the architecture, design, landscaping, and site planning of developments in the community. The provisions of this section will serve to protect property values, prevent the blight and deterioration of neighborhoods, promote sound land use, encourage design excellence, and protect the overall health, safety, and welfare of the City."*

*Redondo Beach Municipal Code*

RBMC Section 10-2.622 includes maximum height limits along with other development standards for the C-2 zone designation that applies to the vacant Flagler Lot. Development standards in the C-2 zone allow for a baseline maximum building height of 30 feet. Development standards in the C-2 zone also require that the maximum density or intensity of development adheres to a FAR of 0.5.

The RBMC does not specify building heights or FARs for development standards of P-CF zoned parcels, such as the existing campus. However, any proposed facilities on P-CF zoned parcels are subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116).

Other sections of the RBMC address the views of construction and parking lot light:

Section 9-1.16: Every holder of a building permit or demolition permit shall completely enclose by fencing the construction site which is the subject of the permit prior to the start of demolition or construction, provided, however, the Chief Building Officer or his or her designee may waive this requirement whenever the terrain, size of the lot, location of neighboring lots, scope of construction or demolition or one or more other factors make it infeasible or unnecessary to completely enclose the construction site by fencing. Any waiver of this provision shall be in writing.

Section 10-~~5~~2.1530: Mechanical equipment and utilities, with the exception of solar heating panels, shall be architecturally screened from view. Roof-top mechanical equipment and appurtenances to be used in the operation or maintenance of a building shall be installed so as not to be visible from any point at or below the roof level of the subject building. This requirement shall apply in construction of new buildings, and in any alteration of mechanical systems of existing buildings that results in significant changes in such roof-top equipment and appurtenances. The features so regulated shall in all cases be either enclosed by outer building walls or parapets, or grouped and screened in a manner architecturally compatible with the building. Minor features not exceeding one foot in height shall be exempted from this regulation, except that such minor features shall be of a color that minimizes glare and blends in with the building.

Section 10-~~5~~2.1706(c)(10)(c): ~~For new developments, with parking areas with three (3) or more parking spaces~~ The light source shall not be visible from the street or surrounding residential properties and the lighting shall be reflected away from adjacent residential premises.

In addition, tree protection and maintenance measures are provided in RBMC Section 10-~~5~~2.1900, which constitutes Redondo Beach's Landscaping Regulations:

Section ~~10-5.1900(b)(2)(g)~~10-2.1900(b)(2)(g): Turf (grass) area (excluding parkways between the public sidewalk and street) shall not exceed twenty (20%) percent of the total landscape area for nonresidential developments, except that higher percentages may be permitted when turf is an essential part of the development such as for playing fields for schools or parks, or integral

to the design of the project as determined through the applicable design review procedures.

Section ~~10-5.1900(c)(3)(f)~~10-2.1900(d): Street tree species, size, spacing, and planting standards shall be subject to approval of the Superintendent of Parks. The Superintendent of Parks shall select street trees taking into consideration the following criteria: that the selected tree as proposed to be located will not harm public sidewalks, streets, and infrastructure; that the tree is consistent with water conservation objectives; that the tree requires low maintenance and no pesticides; that the tree will enhance the visual character and identity of City streets; and that the tree complements appropriate existing street trees. Appropriate street trees include, but are not necessarily limited to, trees included in the City of Redondo Beach List of Recommended Trees and Water Conserving Plants. No existing street tree shall be removed without the approval of the City.

City of Torrance Local Plans and Regulations

*Torrance General Plan Land Use Element*

The eastern portion of the Project site is located within the City of Torrance right-of-way that extends approximately 26-feet from the edge of the paved Flagler Lane. Many goals and policies within the Torrance General Plan Land Use Element relate to aesthetics, visual character, and visual quality (City of Torrance 2005). The most pertinent goals and policies are provided below. Consistency with these goals and policies is analyzed in Section 3.10, *Land Use and Planning*.

Policy LU.2.1 Require that new development be visually and functionally compatible with existing residential neighborhoods and industrial and commercial areas.

Policy LU.2.2 Encourage the transition of incompatible, ineffective, and/or undesirable land uses to land uses that are compatible and consistent with the character of existing neighborhoods.

Policy LU.3.1 Require new development to be consistent in scale, mass and character with structures in the surrounding area. For distinct neighborhoods and districts, consider developing design guidelines that suit their unique characteristics. Create guidelines that offer a wide spectrum of choices and that respect the right to develop within the context of existing regulations.

Policy LU.5.1 Require that new residential development be visually and functionally consistent in scale, mass, and character with structures in the surrounding neighborhood. Encourage residential development that enhances the visual character, quality, and uniqueness of the City's neighborhoods and districts.

*Torrance General Plan Community Resources Element*

The Torrance Community Resources Element combines three elements that were included as separate elements in the previous Torrance General Plan: the Conservation, Open Space, and Parks and Recreation Elements, which have similar threads, such as the provision and conservation of community and natural resources. The Torrance Community Resources Element sets forth goals, objectives and policies that build on current recreation, social services, and resource conservation programs. Policies focus on the preservation and management of open space, providing parks, recreation, and community facilities for all residents, historic preservation, natural resource conservation, preservation of scenic resources, managing energy resources.

Policy CR.1.1 Continue to evaluate the environmental impact of public and private projects on properties that have significant open space value.

Policy CR.~~2.1~~1.2 Require the provision of on-site open space in new developments.

Policy CR.3.4 Zone publicly and privately owned outdoor recreational open space in a manner that preserves such properties for open space use.

Policy CR.3.6 Require greater creativity and flexibility in the design of residential developments to encourage the provision of more usable on-site open space.

Objective CR.4: To ~~preserve scenic vistas wherever possible~~create and maintain open space as an aesthetic enhancement within the urban environment.

Policy CR.4.2 Require that developers and property owners improve their properties by providing landscaping and similar aesthetic treatments along roadways.

Policy CR.4.3 Encourage planting of new trees, and preserve existing street trees in residential neighborhoods.

Objective CR.19: To ~~create and maintain open space as an aesthetic enhancement within the urban environment~~preserve scenic vistas wherever possible.

Policy CR.19.1 Make the preservation of scenic vistas an integral factor in land development decisions.

Objective CR.20: To minimize sources and adverse effects of light pollution.

Policy CR.20.1 Establish regulations for private lighting that minimize or eliminate light pollution, light trespass, and glare (obtrusive light).

Policy CR.20.2 Require that nonresidential uses adjacent or near residential neighborhoods provide shielding or other protections from outdoor lighting and lighted signage.

*Torrance Municipal Code*

The Torrance Municipal Code (TMC) addresses outside equipment and lighting:

Section 92.30.2: All roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls of any building shall be completely screened from public view with materials compatible with the main buildings on the subject property. Such equipment or screening material shall be constructed in such a manner that noises emanating from the roof or wall appurtenances shall not be audible beyond the property lines of the subject property.

Section 92.30.5: All lighting on the subject property shall be constructed in such a manner that glare shall be directed away from all surrounding residential land uses.

In addition, tree protection and maintenance measures are provided in Section 75.1.1 through 75.2.7, which constitutes Torrance's Tree Ordinance:

Section 75.1.5(a): No person may cut, trim, remove, prune, plant, injure or interfere with any tree upon any street, park, alley or public place of the City without first obtaining a permit from the Public Works Director. The permit will be valid for thirty (30) days.

Section 75.1.11: During the erection, repair, alteration or removal of any building, house or structure in the City, no person in charge of such work shall leave any tree, shrub or plant in any street, park, boulevard, alley or public place of the City in the vicinity of such building or structure without good and

sufficient guards or protectors as shall prevent injury to such tree, shrub or plant arising out of or by reason of the erection, repair, alteration or removal.

*Torrance Street Tree Master Plan*

As described in Section 3.3, *Biological Resources*, the Torrance Street Tree Master Plan, adopted in April 2015, was created to enhance and preserve the City's trees by having a set list of recommended trees that would best fit each area of the City. The Torrance Street Tree Planting Matrix (2015) provides the following tree species recommendations for Beryl Street and Flagler Lane:

Beryl Street:

- Indian Laurel Fig (*Ficus microcarpa*)
- Saint Mary Magnolia (*Magnolia grandiflora*)
- Bronze Loquat (*Eriobotrya deflexa*)
- Toyon (*Heteromeles arbutifolia*)

Flagler Lane:

- Strawberry Tree (*Arbutus unedo*)
- Hong Kong Orchid Tree (*Bauhinia blakeana*)
- Chinese Fringe Tree (*Chionanthus retusus*)

### 3.1.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on aesthetics if:

a) The project would have a substantial adverse effect on a scenic vista;

b) The project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway;

c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?; and/or

d) The project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The CEQA Guidelines do not provide thresholds with respect to shade and shadow impacts. Pursuant to CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An iron-clad definition of a significant effect is not always possible because the significance of an activity may vary with the setting.

The CEQA Guidelines do not provide thresholds with respect to shade and shadow impacts. Neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. However, as set forth in the City of Los Angeles CEQA Thresholds Guide (2006), a project would normally be considered to have a significant shade and shadow impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October). For purposes of identifying shadow sensitive land uses, the City of Los Angeles CEQA Thresholds Guidelines (2006), states that *"facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors."* These land uses are termed *"shadow-sensitive"* because sunlight is important to function, physical comfort of commerce.

CEQA case law has established that only public views, not private views, need be analyzed under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah (1991)* 2 Cal. App. 4th 720, the court determined that "*we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in Topanga Beach Renters Assn. v. Department of General Services (1976) 58 Cal.App.3d 188, '[all] government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general*." Similarly, in Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal. App.4th 477, the court upheld an EIR's determination that impacts on public views would be significant, but impacts on private views were not significant. Additionally, in 2018, Appendix G of the CEQA Guidelines was updated to clarify~~ing~~ that impacts to public (not private) views may be significant under CEQA. As such,

effects on private views are not considered under CEQA (Public Resources Code [PRC] Section 21082.2).

A number of public scoping comments addressed the issue of privacy for adjacent residential areas. While CEQA requires an assessment of impacts to public views, the following discussion is provided for informational purposes in response to these comments. The existing campus, which was originally developed in 1958, currently provides views across the residential neighborhood to the east as a result of the existing topography (i.e., the campus ground level is approximately 30 feet higher than the ground level in the adjacent Torrance neighborhood). Many of the backyards in the first row of houses adjacent to the campus are visible from the fourth and uppermost floor of the Beach Cities Health Center under existing conditions. As described in Section 1.0, *Introduction*, the RCFE Building would be sited along the northern perimeter of the campus behind the Redondo Village Shopping Center. This siting reduces the proposed building frontage along the eastern boarder of the campus adjacent to the Torrance residential neighborhood. While residential areas would still be visible from some areas of the campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the sixth and uppermost floor of the RCFE Building to the nearest offsite residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

*The Project site is located immediately adjacent to single family ~~residents~~ residences within the Torrance neighborhood to the east. The backyard of these residences – particularly the first row of houses – is visible from the existing campus.*

*Screened-Out Threshold(s):*

- Threshold (b) (*Scenic Highways and Local Scenic Corrido*rs). There are no State-designated scenic corridors that may be affected by the proposed Project. The nearest designated scenic highway is the Mulholland Highway, located approximately 20 miles to the northwest (Caltrans 2019). The nearest eligible highway is a portion of Pacific Coast Highway located approximately 23 miles north of the Project site. Due to the distance of the Project site from these existing and eligible State scenic highways, the proposed Project would not affect any scenic resources such as trees, rock outcroppings, or historic buildings

within a State scenic highway. Therefore, for the reasons stated above and as discussed in Section I, *Aesthetics* of the Initial Study (IS), this issue is not further analyzed in the EIR. Potential impacts related to landscaping are discussed in Impact VIS-2 and potential impacts associated with historic structures are discussed in Impact CUL-1.

Methodology

This analysis is based on multiple visual reconnaissance surveys of the Project site and the surrounding vicinity, which included extensive photography of existing visual resources (e.g., buildings, landscaping, and view corridors, etc.). The analysis addresses the relationship of the Project site to the surrounding community, and the existing local policy framework for protecting visual resources. Field notes and photographs of existing visual resources of the Project site and vicinity are used to support this analysis. This information was utilized to identify important visual resources present on the Project site and in the surrounding vicinity.

*Scenic Resources and Visual Character*

This analysis focuses on changes to public views and depends upon the sensitivity of the resource, viewing conditions (e.g., angle of view, distance, and primary viewing directions), and the degree of change and visual contrasts to surroundings. These could include substantially or entirely obstructing scenic views or changes to other visual resources such that they may no longer appear characteristic of the Project site.

To evaluate potential changes to visual resources, representative views were identified with input from the City of Redondo Beach. Views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity (refer to Section 3.1.1, *Environmental Setting* and Figure 3.1-1). Each representative view was photographed to establish the existing visual condition from the selected public location. Photosimulations of the Phase 1 preliminary site development plan 3D model were prepared from each representative view to provide a *"before and after"* representation for analysis. The representative analysis focuses on changes from existing conditions as they would be experienced by motorists, bicyclists, and pedestrians from the public realm.

The base photography and photosimulations at each representative viewing location were independently prepared by VIZf/x. VIZf/x used a Nikon d7100 camera with a 35-millimeter lens giving the closest approximation to the human eye. The source image is comprised of between 8 and 10 vertical renderings captured from a tripod and stitched together to create the source base image. Each rendering is 25 percent of what the actual 35-millimeter lens captures, which minimizes any curvature to the architecture and reduces distortion.

Given the programmatic nature of the Phase 2 development program under the proposed Project, the photosimulations of the proposed Project are limited to the Phase 1 preliminary site development plan. Potential effects on the visual character of the Project site and surrounding areas following implementation of the Phase 2 development plan are described qualitatively.

*Consistency with Applicable Regulations and Policies Governing Scenic Quality*

The analysis focuses on changes from existing conditions as they would be experienced by the public realm in the surrounding vicinity. As feasible, this assessment quantifies and/or qualitatively describes the potential changes to visual resources (i.e., change in building heights, setbacks, and distances) to determine if they constitute significant adverse impact (e.g., degradation of visual character).

A comprehensive analysis of policy consistency has also been prepared to describe the proposed Project in the context of the applicable goals and policies of the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~; Redondo Beach Residential Design Guidelines; and the Torrance General Plan Land Use Element and Community Resources Element. Based on a comparison of the proposed Project with these goals, policies and regulations, it was determined whether the proposed Project would conflict with the objectives of these regulations and plans. A proposed Project that does not implement a particular policy or regulation, would not necessarily result in a conflict or an impact. Many of these programs must be implemented by the City of Redondo Beach and/or the City of Torrance over time, and over a broad area; therefore, the focus of the consistency analysis is to ensure that proposed development projects do not preclude the implementation of relevant plans and policies. Further, if a conflict is identified in association with the proposed Project, under CEQA the conflict would only equate to a significant impact if precluding implementation of a given policy or regulation would result in a reasonably foreseeable significant adverse physical effect on the environment.

*Light and Glare*

The analysis of light and glare reviews the new sources of light and glare that would be introduced under the proposed Project and determines whether this light and glare would substantially affect views. A key element in this assessment methodology involves consideration of the existing light and glare standards in the Redondo Beach Residential Design Guidelines, RBMC, and TMC.

*Shade and Shadows*

Shadow length and bearing are dependent on the location of a site, which determines the angle of the sun relative to the Project site. In the Los Angeles basin, the maximum shadow a building can

cast is usually equivalent to three times its height during the Winter Solstice (City of Los Angeles 2006). The potential for off-site shadow effects is dependent on the length of shadows created by a building, and the distance between the building and the nearest shade-sensitive land uses.

Shade and shadow simulations were prepared for the proposed Project using a computer-generated 3D model to identify the height and bulk of proposed building elements, mapping the *"footprint"* (i.e., location, shape, and size) of the Project site, and then calculating and diagramming the shadows that would be cast by the building components during the most extreme, or conservative, conditions given the existing topography and the surrounding development. (see Appendix M). The Project site was modeled using the survey provided by DENN Engineers while the surrounding neighborhood was generated using data from the OpenStreetMap library. These two sources provided the most accurate representation of the site while capturing the wider context to depict how the proposed construction would affect the surrounding neighborhood. The shade and shadow studies were generated in Autodesk Revit 2020 sun lighting utilizing geocoordinates for accuracy.

The analysis simulates shadows for the Summer Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 6:00 p.m., for the Autumnal (Fall) Equinox at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., 4:00 p.m., and 5:00 p.m., and for the Winter Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 4:00 p.m. By modeling shadows for the Autumnal Equinox and the Summer and Winter Solstices, it is possible to see and analyze the worst and best-case scenarios of future shadow effects.

The maximum height of the proposed mixed-use buildings on the Project site would be up to 103 feet above ground level and 133.5 feet above the vacant Flagler Lot below. This height would cast shadows on adjacent and vicinity buildings and public streets, including shadow-sensitive structures. Shadows created by the proposed Project are modeled for both Summer and Winter Solstices, which are the longest and shortest days of the year, respectively, as well as the Autumnal Equinox, of which the days and nights are of equal duration.

### 3.1.4 Project Impacts and Mitigation Measures

Impact Description (VIS-1)

*a) The project would have a substantial adverse effect on a scenic vista*

**The proposed Residential Care for the Elderly (RCFE) Building included in the Phase 1 preliminary development plan would interrupt public view of the Palos Verdes hills from ~~the highpoint at~~ the intersection of 190th Street ~~and~~ &**

**Flagler Lane. However, a reduction in the height of the building would reduce this impact to *less than significant with mitigation*.**

Implementation of the Phase 1 preliminary site development program would result in the construction of a 6-story RCFE Building that would replace the existing 5-story Beach Cities Health Center and attached 1-story maintenance building. The proposed RCFE Building, which would be the tallest building included in the proposed Project, would rise to a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below (refer to Figure 2-6). This would make the RCFE Building the third tallest building in the Beach Cities, and taller than all but three buildings in Torrance (refer to Table 3.1-1).

As previously described, the Redondo Beach General Plan does not identify any scenic vistas or any scenic view corridors within the City. Similarly, the Project site is not located within any of the scenic view corridors identified in the Torrance Community Resources Element (e.g., Torrance Boulevard). The rolling topography and the surrounding low-rise development ranging from 1 to 4 stories generally block distant views of the Project site; however, a distant view of the Project site is provided from Representative View 6, which remains primarily uninterrupted from intervening buildings and landscaped vegetation. Representative View 6 provides a wide-ranging panoramic view of Redondo Beach and the surrounding skyline including the Palos Verdes hills to the south. Although views of the Palos Verdes hills are not designated as a scenic vista by Redondo Beach or Torrance, the ridgeline has scenic qualities and is an important visual feature in the South Bay. For example, the City of Hermosa Beach has identified the long-range views of the Palos Verdes Peninsula as an important scenic vista in the Final EIR for PLANHermosa (State Clearinghouse [SCH] No. 2015081009).

## Table 3.1-1. Buildings Within the Beach Cities and Torrance Over 70 Feet in Height

| Building | Number of Stories | Building Height | Year Built |
|---|---|---|---|
| ***Redondo Beach*** | | | |
| Ocean Plaza | 10 | 122 | 1974 |
| Delphi Apartments | 9 | 110 | 1973 |
| Apartments at King Harbor | 6 | 73 | 1973 |
| 230 South Catalina Avenue | 6 | 73 | 1974 |
| 510-520 The Village | 6 | 73 | 1980 |
| 140 The Village | 6 | 73 | 1980 |
| 130 The Village | 6 | 73 | 1980 |
| 120 The Village | 6 | 73 | 1980 |
| 110 The Village | 6 | 73 | 1980 |
| 200 South Catalina Avenue | 6 | 73 | 1972 |
| The Sand Castle | 6 | 73 | 1971 |
| ***Manhattan Beach*** | | | |
| Westdrift Manhattan Beach | 7 | 85 | 1986 |
| Manhattan Towers I | 6 | 73 | 1985 |
| Manhattan Towers II | 6 | 73 | 1985 |
| ***Torrance*** | | | |
| Golden West Tower | 14 | 171 | 1973 |
| DoubleTree Hotel Torrance | 13 | 159 | 1974 |
| California Bank & Trust Tower | 13 | 159 | 1967 |
| Computax Tower | 8 | 98 | 1988 |
| 21535 Hawthorn Boulevard | 8 | 98 | 1968 |
| Lundquist Tower | 7 | 85 | 2014 |
| Torrance Memorial Hospital | 7 | 85 | 1970 |
| Commonwealth Plaza | 6 | 73 | 1981 |
| 3400 Lomita Boulevard | 6 | 73 | 1969 |

Notes: The tallest building within Hermosa Beach is the 4-story Commodor Condominiums at a height of 49 feet. No buildings exceed a height of 70 feet in this City.
Source: Emporis 2021.

*~~KVL~~ Representative View 6: Flagler Lane & 190th Street Intersection (Facing South)*

***Representative View 6**: Distant views along 190th Street near its intersection with Flagler Lane are characterized by green mature street trees to the east (i.e., left) and the commercial nursery to the west (i.e., right) as well as existing white buildings at the campus against the backdrop of the Palos Verdes hills in the background. The ridgeline of the Palos Verdes hills is almost entirely uninterrupted from this view. The view is influenced by the open sky above the ridgeline, streaked with crossing powerlines in the foreground. The RCFE Building would not substantially reduce the open sky from this view, but would interrupt the ridgeline of the Palos Verdes hills. Source: VIZf/x 2021.*

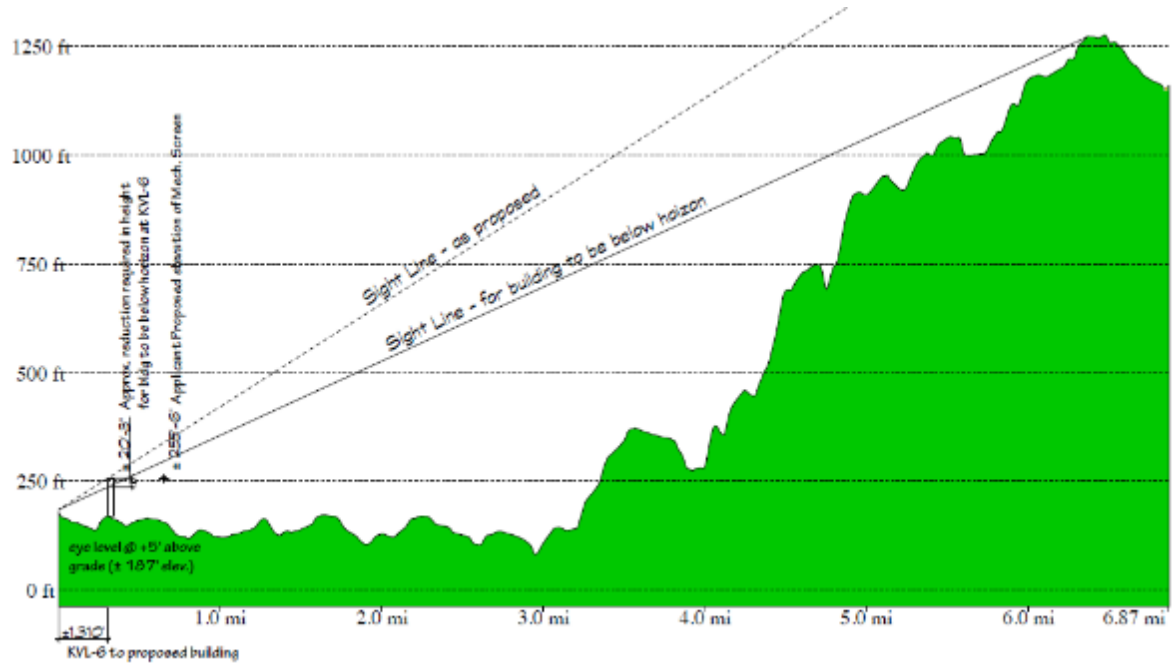
This distant view of the Palos Verdes hills is provided to vehicles, bicyclists, and pedestrians traveling in an east-west direction on 190th Street. Traveling westbound toward the Redondo Beach waterfront the Project site comes into view approximately 200 feet before the signalized intersection of 190th Street & Flagler Lane. Representative View 6 is taken from the signalized intersection where vehicles stop and have the longest opportunity to look to the south. From this location the eye is naturally drawn toward the wide-ranging panoramic view to the south given the surrounding development lining the street blocking the views in the other directions. The view becomes blocked again by low-rise development approximately 1,200 feet west of the intersection, when the road descends toward the waterfront. As such, vehicles traveling the speed limit of 35 miles per hour (mph) experience this view for approximately 30 seconds. Depending on traffic at the signalized intersection, the view could be available for slightly longer, but generally less than 1 minute.

As previously described, the existing views of the Project site from this location include the prominent 5-story Beach Cities Health Center and the 43-story Providence Little Company of Mary Medical Institute Building, with white building façades and dark tinted windows that form horizontal strips across the buildings. These buildings are visible against the backdrop of the Palos Verdes hills. Although the Project site is surrounded by a neighborhood of low-lying residential and commercial buildings, views of the surrounding buildings are limited from this view due to the mature street trees and other large canopy trees which obstruct views of the structures in the mid-ground. Foreground views include two travel lanes and one center left-turn lane along Flagler Lane, diagonally parked cars along the east side of Flagler Lane, and vegetation within the nursery on the west (i.e., right) side of the view. Powerlines also can be seen crossing the top of the view across the open sky.

The proposed 133.5-foot RCFE Building would be substantially taller and larger than the existing 1- to 5-story buildings on the existing campus and would rise above all other surrounding development in the vicinity. Additionally, the proposed RCFE Building would rise above the top of the Palos Verdes hills as viewed from Representative View 6 and would obscure a substantial portion of this scenic feature (e.g., approximately one third of the ridgeline).

Given the height of the proposed RCFE Building and its interruption of the Palos Verdes ridgeline as viewed from Representative View 6, implementation of the Phase 1 preliminary site development plan would substantially alter and degrade this important scenic view from 190th Street. Therefore, impacts to scenic views from development of the proposed 133.5-foot RCFE Building would be *potentially significant*.

According to a Sight Line Study prepared by VIZf/x, the RCFE Building would need to be reduced in height by 20 feet and 3 inches in order to remain below the ridgeline of the Palos Verdes hill from Representative View 6. With implementation of MM VIS-1, the proposed RCFE Building would be reduced to 82.75 feet above existing campus ground level and 113.25 feet above the vacant Flagler Lot below, and impacts would be *less than significant with mitigation*.




*The proposed RCFE Building is the tallest building included in the proposed BCHD Healthy Living Campus Master Plan. A Sight Line Study was prepared by VIZf/x (pictured above with the existing topography represented in green) to determine the required height reduction, necessary to avoid impacts to the Palos Verdes hills in the background. This study determined that the building would need to be reduced by no less than 20 feet and 3 inches.*

As described in Impact VIS-2, the Phase 2 development program would further change the visual character of the Project site through the proposed demolition of the existing parking structure and potentially the Beach Cities Advanced Imaging Building. The Phase 2 development program would result in the construction of a new building(s) ranging in height from 53 feet to 68 feet above ground level and a new parking structure, reaching a maximum height of 76 feet. However, given the height of the proposed development in Phase 2, it would not be visible behind the RCFE Building. Therefore, the Phase 2 development program would not affect the wide-ranging panoramic view of the Palos Verdes ridgeline from Representative View 6.

Mitigation Measure (MM)

***MM VIS-1*** ***Reduced Residential Care for the Elderly (RCFE) Building Height.*** *The final design of the Phase 1 preliminary site development plan shall be revised to reduce the maximum height of the RCFE Building in order to avoid interruption of the ridgeline of the Palos Verdes hills as viewed from the intersection of 190th Street & Flagler Lane. This revision to the final design could include a reduction in the floor-to-ceiling height, ~~the~~ removal of the uppermost stories of the building, and/or recessing the building foundation further into the ground surface. The reduced building height shall be formalized on all final building plans and construction plans, as appropriate, prior to the issuance of any demolition, grading, or building permits by the Redondo Beach Building & Safety Division. City of Redondo Beach permit compliance staff shall observe and ensure compliance with these specifications during construction activities associated with the proposed Project.*

Residual Impacts

Based on the Sight Line Study prepared by VIZf/x, the implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) to approximately 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). With this reduction, the maximum height of the proposed RCFE Building would rise to just below the ridgeline of the Palos Verdes hills from 190th Street and Flagler Lane. Therefore, the wide-ranging panoramic views of the Palos Verdes ridgeline from Representative View 6 would remain uninterrupted, and this visual impact would be reduced to *less than significant*. Additionally, the height reduction would further reduce the length of shadows cast onto the adjacent properties, as described in Impact VIS-4.

As described in MM VIS-1 the final design could include the removal of the uppermost stories of the building and/or recessing the building further into the campus. The removal of the uppermost stories of the building under MM VIS-1 would incrementally reduce the duration of construction activities associated with the RCFE Building. As such, the duration of criteria air pollutant emissions and the total amount of greenhouse gas (GHG) emissions would be reduced. Further, the severity of noise impacts described in Impact NOI-1 would also be reduced given that the total duration of construction above the feasible height of the required noise barriers (refer to MM NOI-1) would be substantially reduced. In contrast, if the building is further recessed into the ground, there could be an increase in the duration of air quality emissions and total GHG emissions associated with the required excavation activities. Additionally, there would be an increase in the number of haul trucks required to export soils from the Project site. However, the severity of noise impacts described in Impact NOI-1 would still be reduced given that the total duration of

construction activities above the feasible height of the required noise barriers would be reduced. Nevertheless, Impact NOI-1 would remain *significant and unavoidable*.

Impact Description (VIS-2)

*b) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

**VIS-2 The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would alter the visual character of the Project site and surrounding areas in Redondo Beach and Torrance. However, the proposed development would comply with the Redondo Beach and Torrance General Plans and municipal codes and would not degrade the surrounding visual character. Therefore, impacts would be *less than significant.***

*Phase 1 Preliminary Site Development Plan*

Phase 1 of the proposed Project would include the construction of the 6-story RCFE Building and the demolition of the existing 5-story Beach Cities Health Center and the attached 1-story Maintenance Building located at 514 North Prospect Avenue.

The RCFE Building has been designed as a curvilinear building that follows the northern perimeter of the Project site overlooking the adjacent Redondo Village Shopping Center and Beryl Street below.[1] Neither the Redondo Beach General Plan Land Use Element nor the RBMC specify building heights, FARs, setbacks, or for development standards for parcels zoned as P-CF. However, the proposed Project would be subject to Redondo Beach Planning Commission Design Review in accordance with RBMC Section 10-2.1116. The portion of the RCFE Building that would overhang the proposed driveway and pick-up/drop-off zone on the vacant Flagler Lot would not exceed the 0.5 FAR requirement or the 30-foot maximum height and 2 story maximum allowed in C-2 zones by RBMC Section 10-2.625 (refer to Section 3.1.2, *Regulatory Setting*). ~~This portion of the proposed RCFE Building would exceed the 0.5 FAR requirement; however, Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located, subject to Planning Commission Design Review and issuance of a CUP.~~

[1] The proposed RCFE Building would be curvilinear in that it would follow the curved line of the northern perimeter of the existing campus.

The ground floor of the RCFE Building would be developed on concrete columns with predominantly glass walls providing public views of and pedestrian access to the proposed active green spaces located within the central campus. Phase 1 would also include ornamental landscaping surrounding the RCFE Building as well as a large lawn in the interior of the campus that would serve as an open space for both the campus and the surrounding community. The western border (i.e., along North Prospect Avenue) and eastern border (i.e., along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with large shade canopy trees and smaller shade trees to provide landscape screening and soften the views of the campus. Similarly, the campus's northern border would be lined with shade and flowering ornamental trees to soften the views from the Redondo Village Shopping Center (refer to Figure 2-9).

Changes to the visual character of the Project site and its surroundings depicted in Representative Views 1 through 5, are described in detail below, to assess the potential impacts on the visual character and visual qualities of the areas immediately adjacent to the Project site.

Representative View 1 – located on Tomlee Avenue west of its intersection with Mildred Avenue – represents obstructed views of the Project site from the residential neighborhood within Torrance adjacent to the east of the Project site. This view includes foreground views of the street, mid-ground view of the east-facing single-family residences along Tomlee Avenue, and background views of large, landscaped trees as well as the upper levels of the Beach Cities Health Center and the open sky above.

The implementation of the Phase 1 preliminary site development plan would include the demolition of the existing Beach Cities Health Center and the construction of the proposed RCFE Building, which would rise up to 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below. Similar to existing views of the Beach Cities Health Center from this location, views of the RCFE Building would be limited to the upper two stories of a portion of the building. The majority of the RCFE Building would be obstructed by the single-family residences and large trees in the foreground. Additionally, the vast majority of the open sky views above the single-family residences would remain. Therefore, the implementation of the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from the public realm at this location.

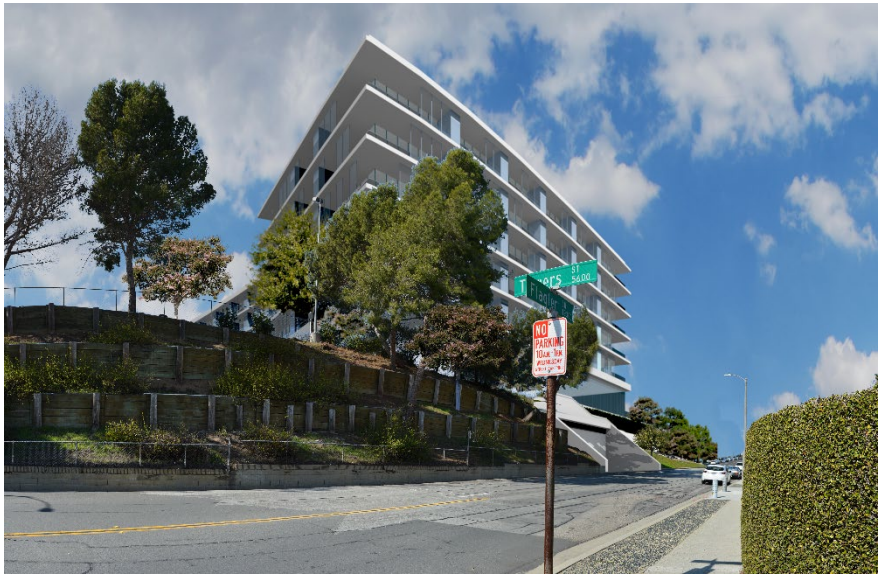
*Representative View 1: Tomlee Avenue (Facing West)*

***Representative View 1:*** *The proposed RCFE Building would rise up to 103 feet above the existing campus ground level and 133.5 feet above the vacant Flagler Lot. Views of the proposed RCFE Building from Tomlee Avenue would be partially screened by mature landscaped trees surrounding the single-family residences as well as along the eastern perimeter of the Project site. However, the top two stories of the RCFE Building and the rooftop cooling tower would be visible from this location and would obscure a portion of the open sky above. Source: VIZf/x 2021.*

Representative View 2 provides a view of the Project site from the northeast corner of Flagler Lane and Towers Street facing east toward the Project site. This view was selected because it represents the view of the steep grade, retaining walls, and landscaped vegetation along the eastern border of the Project site, which is visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street. The view is currently dominated by the existing retaining walls and vegetation that support the steep slope along the eastern perimeter of the Project site. Chain link fences line both the bottom and the top of the slope. Above the slope, the open sky is currently visible, but partially interrupted by large, landscaped trees. Given the central location of the Beach Cities Health Center and the two medical offices, none of the existing buildings on the campus are visible from this location. The only visible buildings are residential development along Beryl Street, including the 4-story multi-family residential building located at the intersection of Beryl Street & Flagler Lane along the north (i.e., right) side of the view.

The proposed RCFE Building would be visually prominent from this viewpoint, rising above the retaining walls and vegetation along eastern slope in the mid-ground. The proposed 6-story RCFE Building would be substantially taller and larger than the existing 1- to 5-story buildings currently on-site, as well as the adjacent 1- to 4-story buildings. The RCFE Building would reduce access to views of the open sky for motorists, bicyclists, and pedestrians traveling westbound Towers Street and turning on Flagler Lane. However, due to the location of the Project site along the northern perimeter of the campus, approximately half of the open sky view would remain. Further, the proposed ornamental landscaping surrounding the RCFE Building as well as along the eastern border of the campus would provide intermittent large shade canopy trees and smaller shade trees. The ornamental landscaping would partially screen and would soften views of the RCFE Building from this location, particularly for the lower floors of the building. Therefore, although the height and mass of the proposed RCFE Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would not degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

*Representative View 2: Flagler Lane & Towers Street Intersection (Facing West)*




***Representative View 2****: Views along Flagler Lane at Towers Street are characterized by the retaining walls and large mature trees that support the steep slope along the eastern perimeter of the campus. While the existing Project site is barely visible, the view along Flagler Lane is influenced by the open sky above the slope. The Project would substantially reduce access to open sky from this view, and would change the visual character of this view from the residences in this Torrance neighborhood as well as travelers along Flagler Lane and Towers Street. Source: VIZf/x 2021.*

*Representative View 3: Flagler Lane & Beryl Street Intersection (Facing Southwest)*

***Representative View 3****: Views of the Project site from this location are characterized by the vacant Flagler Lot in the foreground, which is currently covered with gravel and weedy vegetation and is leased as a staging area for construction equipment. The proposed RCFE Building would rise up to 133.5 feet above Flagler Lot and would be more visually prominent from this location given its location along the northern perimeter of the campus. Source: VIZf/x 2021.*

Views of the Project site from this location are currently framed by wooden utility poles and powerlines as well as traffic signals and streetlights along Beryl Street in the foreground. The existing frontage along Beryl Street is characterized by gravel and weedy vegetation, construction staging equipment, and iron fencing along the western, northern, and eastern borders of Flagler Lot. This vacant lot is currently leased by BCHD for construction staging, and the visual character

is often dominated by construction vehicles and equipment. The campus is also framed by mature trees along the eastern and northern perimeters of the campus in the mid-ground. Views of the Beach Cities Health Center and Providence Little Company of Mary Medical Institute Building from this location are limited due to the existing landscaped trees. Above the Beach Cities Health Center and Providence Little Company of Mary Medical Institute Building, views of the open sky are interrupted by crossing powerlines.

Any development on the vacant Flagler Lot would be characterized as a change, given its undeveloped nature. The proposed Project would comply with the required building height prescribed in RBMC Section 10-2.622, and would provide visual interest with design elements that would add varied composition and texture to the proposed RCFE Building. For example, the curvilinear building would include exterior façades with simple forms constructed using white concrete floor slabs infilled with paneling, non-reflective glass, and painted privacy sunscreens on white concrete balconies. The ground floor of the RCFE Building would be developed on concrete columns with predominantly glass walls allowing public views of and pedestrian passage to active green spaces located within the central campus area of the Project site. The height of the first floor of the RCFE Building overhanging the proposed one-way driveway and pick-up/drop-off zone on the vacant Flagler Lot would create a stepback in height along the building façade in this area to soften the effect of the perceived building height from the pedestrian perspective at street level along Beryl Street.

The Phase 1 preliminary site development plan would enhance the street level character at the intersection of Beryl Street & Flagler Lane by providing shade and flowering ornamental street trees and a tiered staircase facing Beryl Street, which would lead to the central campus area of the Project site. While the Phase 1 preliminary site development plan would remove existing on-site landscaping, Phase 1 development would include new ornamental landscaping surrounding the RCFE Building as well as along the frontages with Flagler Lane and Beryl Street to provide shade and visual benefits associated with the dense canopy and foliage. The proposed ornamental landscaping as well as public views of and pedestrian passage to active green spaces located within the central campus area of the Project site would activate and improve the pedestrian character of the Beryl Street public realm. Further, views of the landscaped ~~open air dining terrace~~rooftop garden atop the first floor of the RCFE Building would create a more pedestrian friendly environment along Beryl Street by inviting visitors to the campus. Therefore, implementation of the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

*Representative View 4: Beryl Street & Harkness Lane Intersection (Facing South)*

***Representative View 4**: Views along Beryl Street between North Prospect Avenue and Flagler Lane are characterized by the 2- to 4-story multi-family residential buildings to the north (not visible from Representative View 4) and the low-rise Redondo Village Shopping Center to the south (visible). Background views of the Project site and open sky are visible above the Redondo Village Shopping Center. The proposed Project would reduce access to open sky with development of the RCFE Building during implementation of the Phase 1 preliminary site development plan. Source: VIZf/x 2021.*

Views from this location are dominated by Beryl Street in the foreground and the low-rise Redondo Village Shopping Center in the mid-ground. Views of Beryl Street from this location are characterized by the four travel lanes and wide pedestrian crosswalks as well as the large canopy trees adjacent to the pedestrian sidewalks on the south side of the street. The low-rise commercial buildings that comprise the Redondo Village Shopping Center are characterized by a tan exterior with large windows, colorful signs, and red tile roofing. The commercial buildings are partially obstructed by the large canopy street trees along Beryl Street as well as the tall trees within the vegetated medians in the surface parking lot of the shopping center. Views of the Project site from this location include the existing 5-story Beach Cities Health Center and the upper west corner of

the Providence Little Company of Mary Medical Institute Building along with the large trees that border the northern perimeter of the Project site.

Implementation of the Phase 1 preliminary site development plan would noticeably alter the existing views of the Project site from this location. The existing 5-story Beach Cities Health Center visible in the background would be replaced by views of the proposed 6-story, 133.5-foot-tall RCFE Building, with articulated façades and painted privacy sunscreens on white concrete balconies with handrails. Further, the proposed RCFE Building, which would be located along the northern perimeter of the Project site, would be positioned substantially closer to this location than the Beach Cities Health Center, which is located within the center of the campus. Given the location of the proposed RCFE Building along the northern perimeter of the Project site, the height, bulk, and scale of the proposed development would be greater than the existing development on campus. Therefore, the perceived height of the RCFE Building from the pedestrian perspective would be more pronounced from this location.

The proposed RCFE Building would obstruct views across the Project site and reduce access to open sky. However, the building would be partially screened by existing large canopy trees along Beryl Street. The proposed ornamental landscaping surrounding the RCFE Building would also provide screening to soften views of the Project site's frontage from this location and patrons of the Redondo Village Shopping Center. Therefore, while the height of the proposed RCFE Building would be greater than existing conditions, the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from this location.

The view location of Representative View 5 is the signalized intersection of North Prospect Avenue and the central driveway into the Project site. In addition to representing the views seen by vehicles and pedestrians along North Prospect Avenue, this view also represents the view from the public realm on the south side of the street near the existing single-family residences. The Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building are all visible in the mid-ground from this location. The mature canopy trees that surround the existing buildings on-site are a dominant visual feature from this location, providing shade and greenery and blocking some views of the existing Project site. Views of the open sky above are limited due to obstruction by the existing buildings on-site, traffic signals, and crossing powerlines. Implementation of the Phase 1 preliminary site plan would slightly alter existing views of the Project site from this location. Specifically, the frontage along North Prospect Avenue would change as the perimeter of the campus would be re-landscaped with a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern

California. The proposed intermittent large shade canopy trees and smaller shade trees would provide landscape screening to soften the campus interface.

*Representative View 5: North Prospect Avenue and Central Driveway Intersection (Facing Northeast)*

***Representative View 5****: Views of the proposed Project from North Prospect Avenue would be partially screened by large shade trees and ornamental trees. The proposed RCFE Building would change the visual character and views from this location. However, the landscaped trees would soften views of the building and given the RCFE Building's setback from North Prospect Avenue, the height, bulk, and scale of the building would be consistent with existing Beach Cities Health Center from this location. Source: VIZf/x 2021.*

As previously described, the proposed RCFE Building would rise up to 103 feet above the existing ground level and 133.5 feet above the vacant Flagler Lot below. The RCFE Building, which would line the northern perimeter of the Project site, would be set further back from North Prospect Avenue than the existing Beach Cities Health Center, which is located within the center of the campus and visible in the mid-ground from this location. Given the setback of the proposed RCFE Building setback from North Prospect Avenue, the height, bulk, and scale of the building from this location would be consistent with the existing 5-story Beach Cities Health Center. Therefore,

although the RCFE Building would be taller than the existing Beach Cities Health Center, the perceived height of the RCFE Building from the pedestrian perspective would remain similar from this location.

Similar to the existing views of the Beach Cities Health Center, the RCFE Building would be visually prominent in the mid-ground from this location. The white concrete façade and tinted glass windows of the RCFE Building would be similar to the existing façade of the Beach Cities Health Center. The proposed perimeter landscaping would screen views of the RCFE Building as well as the Beach Cities Advanced Imaging Building and Providence Little Company of Mary Medical Institute Building.

Therefore, although the height and mass of the proposed RCFE Building would be greater than what currently exists on-site, the building would not be out of context with existing views of the Beach Cities Health Center from this location. Implementation of the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from this location, and the proposed landscaping improvements along the North Prospect Avenue frontage would improve the visual character from this location and the Redondo Beach residential neighborhood to the west.

*Phase 2 Development Program*

As described in Section 2.0, *Project Description*, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the development program under Phase 2 of the proposed BCHD Healthy Living Campus Master Plan is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Due to the uncertainties in the ultimate programming and site plan associated with the Phase 2 development program, the potential impacts to the visual character and quality of public views in Phase 2 are discussed programmatically.

Section 2.0, *Project Description* depicts three example site plan scenarios of the Phase 2 development program to illustrate the possible range of development. Representative views of these example site plans have been provided for illustrative purposes to help inform the program analysis.

- **Phase 2 – Example A: Original June 2020 Phase 2 Development –** This example site plan scenario would include the development of a 4-story Community Health and Wellness Center, rising to a height of 81 feet (including rooftop projections) above the existing ground level (refer to Figure 2-11). The existing above ground parking structure located at

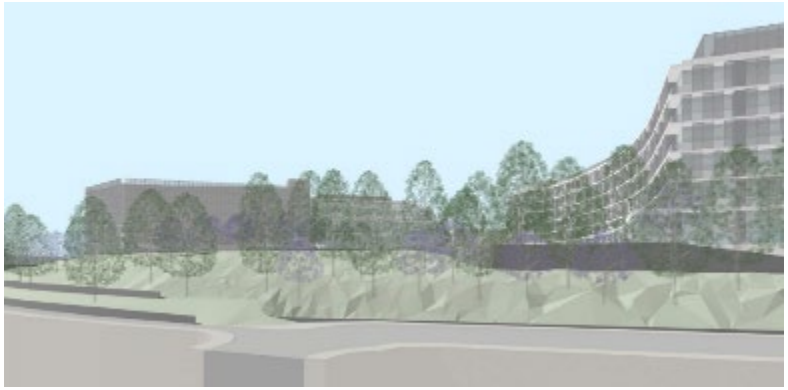
512 North Prospect Avenue would be demolished to provide space for the Community Health and Wellness Center and a new above ground parking structure. The proposed above ground parking structure would occupy a footprint of approximately 31,400-sf, including 2 subterranean levels and 8.5 above ground levels, rising to a height of 76 feet above the campus ground level.

- **Phase 2 – Example B: Phase 2 Building with Automated Parking –** Similar to the Example A Site Plan Scenario, this example site plan scenario would include the demolition of the existing parking structure at 512 North Prospect Avenue to support development of a new building with combined Wellness Pavilion, Aquatics Center, and Center for Health and Fitness (CHF) uses as well as a new parking structure (refer to Figure 2-12). However, the proposed parking structure would be automated (i.e., a mechanical system designed to minimize the area and/or volume required for parking cars), allowing for a reduction in the height of the parking structure and more useable open space on the campus. The total footprint of the automated parking structure would be approximately 20,000-sf with parking provided over 1 subterranean level and 3 above ground levels, rising to a height of 61 feet above the existing campus ground level and 91 feet above the vacant Flagler Lot below.
- **Phase 2 – Example C: Rotated Phase 2 Building(s) with Automated Parking and a New Medical Office Building –** This example site plan scenario would demolish the Beach Cities Advanced Imaging Building and replace it with a new 3-story, 50,000-sf, purpose-built medical office building, which would rise to a height of 55 feet (including rooftop projections) above the campus ground level and 85 feet above the vacant Flagler Lot below. Following the demolition of the parking structure at 512 North Prospect Avenue, 41-foot-tall building would be constructed for the proposed Aquatics Center and CHF. The Wellness Pavilion would be constructed as a separate circular-shaped building located in the center of the campus rising to a height of 54 feet (refer to Figure 2-13). As with the Example B Site Plan Scenario the proposed automated parking structure in this example site plan scenario would rise to a height of 61 feet above the campus ground level.

*View of Central Driveway along North Prospect Avenue*

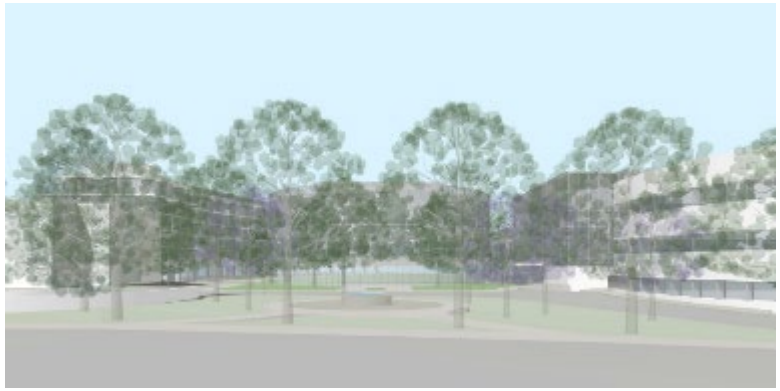
*View from Secondary Driveway on North Prospect Avenue*

*View from North Prospect Avenue & Diamond Street*



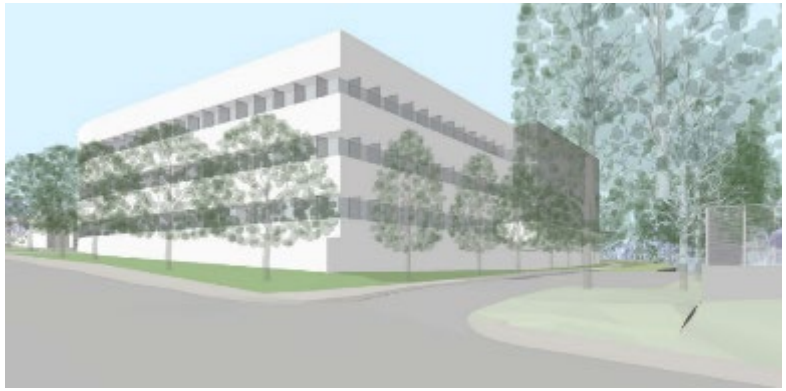
*View from Flagler Lane & Towers Street*

*The Example A site plan scenario would include an approximatey 81-foot-tall Community Health and Wellness Center and a 76-foot-tall parking structure that would be visible from North Prospect Avenue (top left). However, the building would be partially obscured by landscaping within the entry plaza. The Community Health and Wellness Center would also partially block views of the RCFE Building in the central area of the campus. Views from Flagler Lane & Towers Street would remain similar to those depicted for Phase 1 in Representative View 2; however, the 76-foot-tall parking structure would be visible along the eastern slope further to the south (i.e., bottom right). This parking structure would further obscure open sky when viewed from Flagler Lane and Flagler Alley. The Example B site plan scenario would provide similar views; however, the height of the proposed parking structure would be slightly reduced to a height of 61 feet above the existing campus ground level.*

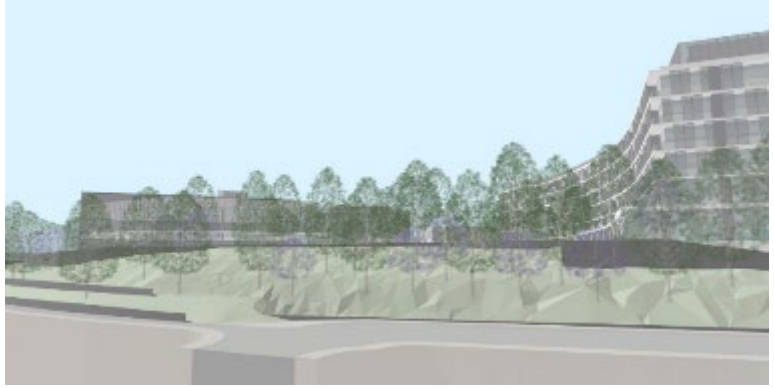


*View of Central Driveway along North Prospect Avenue*

*View from Secondary Driveway on North Prospect Avenue*



*View from North Prospect Avenue & Diamond Street*



*View from Flagler Lane & Towers Street*

*The Example C Site Plan Scenario would include an 41-foot Aquatics Center and CHF as well as a 55-foot-tall medical office building. Additionally, this example site plan would include a 61-foot-tall automated parking structure. While the total area of disturbance would be greater as compared to the Example A Site Plan Scenario, the height of development under this example site plan would be reduced. Notably, the height of the parking structure would be approximately 15 feet lower than the parking structure in the Example A Site Plan Scenario.*

The proposed Community Health and Wellness Center under the Example A and B Site Plan Scenarios would be located centrally within the campus and would rise to a height of 81 feet above the campus ground level. The height of the proposed parking structure under the Phase 2 development program would range from 3 above ground levels (61 feet) under the Example B and C Site Plan Scenarios to 8.5 above ground levels (81 feet) under the Example A Site Plan Scenario. These structures would not be visible from Representative View 3 (Flagler Lane & Beryl Street), Representative View 4 (Beryl Street & Harkness Lane), or Representative View 6 (Flagler Land & 190th Street) to the north. Views of the Phase 2 development would be blocked by the proposed RCFE Building that would be constructed during Phase 1.

The Phase 2 development – including the Wellness Pavilion, Aquatics Center, and CHF as well as the parking structure – would be primarily visible from Representative View 5, along North Prospect Avenue, where the Phase 2 development would replace the existing Beach Cities Health Center. Additionally, the development would be visible from the public realm (i.e., the street and the sidewalk) along Diamond Street. The proposed parking structure would also be visible from these vantage points. The Example A Site Plan Scenario would result in the greatest change with the Community Health and Wellness Center, reaching a height of 81 feet above the existing campus ground level, and the parking structure would reach a height of 76 feet above the existing campus ground level. In contrast the Example C Site Plan Scenario, which would also include the redevelopment of the Beach Cities Advanced Imaging Building, would result in a reduced scale of development with a maximum height of 61 feet above the existing campus ground level. Under either scenario these buildings would be viewed against a backdrop of the RCFE Building constructed during Phase 1 and would not substantially obscure views of the open sky above.

Each of the example site plan scenarios would involve the construction of a multi-level parking structure along the eastern perimeter of the Project site. This would result in a net increase in the overall height compared to the existing parking structure at 512 North Prospect Avenue, which currently provides 3 above ground levels. Under any of the example site plan scenarios the proposed parking structure would likely be visible from Representative View 1, located within the Torrance neighborhood to the east of the campus. However, at a maximum height of 81 feet, this parking structure would be more than 20 feet shorter than the proposed RCFE Building. As such, the parking structure would be just barely visible over the single-family houses and would not substantially obscure the view of the open sky above. If an automated parking structure were constructed as described for the Example B and Example C Site Plan Scenarios, the 61-foot-tall parking structure may be almost entirely obscured from view from Representative View 1. Therefore, while the parking structure would be visible from North Prospect Avenue, Diamond

Street, and along Flagler Alley, it would not be visually prominent from the public realm in the neighborhood to the east of the campus.

*Summary of Impacts on Visual Character*

The existing Beach Cities Health Center and medical office buildings on the Project site, which range in height from 1 to 5 stories, are prominent visual features from locations in the surrounding vicinity, which is surrounded by low-rise commercial and multi-family residences to the north, single family residences to the west, south, and east, and a public park to the northeast. The former South Bay Hospital was originally developed in 1958 and since that time has contributed to the overall character of the surrounding area. The distinct façades of the buildings, with their white concrete columns and blue/black tinted windows that form horizontal stripes across the buildings, provide a familiar sight for people in the surrounding area.

The development of the proposed RCFE Building and subsequent demolition of the Beach Cities Health Center would result in a change in the existing views across the site. Views of the Project site would not change substantially from locations where intervening structures would obstruct the RCFE Building, such as along Tomlee Avenue (Representative View 1). Additionally, development of the RCFE Building would not substantially alter views of the Project site from North Prospect Avenue (Representative View 5) due to the setback of the building from this location and proposed landscaping, which would partially obscure views of the interior of the campus. The proposed RCFE Building would be most visually prominent from Flagler Lane near Towers Street (Representative View 2) and Beryl Street (Representative View 3), and along Beryl Street in front of the Redondo Village Shopping Center (Representative View 4). From Representative Views 2, 3, and 4, the proposed RCFE Building would be substantially taller and would have substantially more massing than buildings in the vicinity, thereby reducing the view of open sky above. However, although the proposed RCFE Building would change the visual character of the Project site and surrounding areas from these locations, the Phase 1 preliminary site development plan would meet the development standards described in the Redondo Beach and Torrance General plans and municipal codes and would not degrade the visual character of the Project site and vicinity. The proposed Project includes many attributes that would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections

with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm. Therefore, implementation of the Phase 1 preliminary site development plan would change, but not degrade, the visual character of the site from Representative View 1 through 5.

Although the Phase 2 development program is less defined, the example site plan scenarios would include construction of additional buildings on campus, which would be taller and would have more massing than existing buildings in the Project vicinity. Similar to the Phase 1 preliminary site development plan, none of the example site plans would substantially degrade the visual character of the Project site and vicinity from Representative Views 1 through 5.

Overall, changes in the quality of views through the site and surrounding areas would not be adversely affected as a result of implementation the proposed Project. Therefore, impacts to existing visual character and quality of the site and surrounding areas would be *less than significant*.

*Consistency with City of Redondo Beach Policies*

As previously described, the first floor of the proposed RCFE Building would overhang a proposed driveway and pick-up/drop-off zone on the vacant Flagler Lot. The portion of the building located on the vacant Flagler Lot would not exceed the 0.5 FAR requirement or the designated 30-foot or 2-story maximum height allowed in C-2 zones by RBMC Section 10-2.625 (refer to Section 3.1.2, *Regulatory Setting*). ~~This portion of the proposed RCFE Building would exceed the 0.5 FAR requirement. However, Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located, subject to Planning Commission Design Review and issuance of a CUP~~

*The vacant Flagler Lot is zoned C-2 (Commercial) land use. Development standards in the C-2 zone allow for a maximum building height of 30 feet and require that the maximum density or intensity of development adheres to a FAR of 0.5.*

~~(refer to Section 3.1.2, *Regulatory Setting*).~~ Additionally, this increase in development density on the vacant Flagler Lot would not result in a physical impact related to aesthetics given the backdrop of the proposed RCFE Building that would be constructed as a part of the proposed Phase 1 preliminary site development plan.

The RBMC does not specify building heights or FARs for development standards of P-CF zoned parcels, such as the existing campus. However, the proposed Project would be subject to review and approval by the Redondo Beach Planning Commission in accordance with RBMC Section 10-2.1116.

The proposed Project is compared to the applicable policies of the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. While the design guidelines apply only to buildings and structures in the R-2, R-3, R-3A, RMD, RH-1, RH-2, and RH-3 multiple-family residential zones, they are considered applicable to the 217 Assisted Living and Memory Care units proposed for the RCFE Building. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Table 3.1-2 below was prepared by Wood Environment & Infrastructure Solutions, Inc. (Wood) land use planning staff based on description of the proposed Project provided in Section 2.0, *Project Description*. Final policy consistency would be determined as part of the Planning Commission Design Review and related discretionary decision-making processes. However, based upon this preliminary analysis, the proposed Project, with implementation of required mitigation measures identified in this EIR and required consistency with existing regulations, would be consistent with the Redondo Beach General Plan and Design Guidelines. Because the proposed Project would be consistent with applicable regulations that govern scenic quality, based on the thresholds of significance derived from Appendix G of the CEQA Guidelines impacts would be *less than significant*.

## Table 3.1-2. Potential Conflict with the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ Policies and Residential Design Guidelines for Multi-Family Residential

| Policies | Discussion |
|---|---|
| ***Land Use Element Policies*** | |
| **Policy 1.46.4.** Establish standards for the City and coordinate with other public agencies to ensure that public buildings and sites are designed to be compatible in scale, mass, character, and architecture with the existing buildings and pertinent design characteristics prescribed by this Plan for the district or neighborhood in which they are located. | **No Conflict.** The existing campus was originally developed as a former hospital building in 1958. The two medical office buildings (510 and 520 North Prospect Avenue) were added to the campus in 1976 and 1989, respectively. As such the existing campus is an established use and prominent feature in the area, rising to a height of 76 feet above the campus ground level and the surrounding low-rise development.<br>The redevelopment of the campus would meet the zoning requirements for height in a parcel zoned for C-2. Additionally, the proposed Project would be subject to a Planning Commission Design Review consistent with the requirements for development in a parcel zoned for P-CF. While the proposed Project would increase the total height of development on the Project site, the proposed development under Phase 1 and Phase 2 would employ a variety of siting, planning, and architectural techniques to reduce visual bulk and create compatibility with surrounding low-rise development in the vicinity. For example, the proposed RCFE Building has been located on the northern perimeter of the Project site along the Redondo Village Shopping Center below. While the upper levels of the proposed RCFE Building would be visible from Beryl Street, this proposed orientation would reduce the bulk, mass, and scale of the development when viewed from the public realm in the Torrance neighborhood to the east and from the single-family residences along North Prospect Avenue to the west. Additionally, the location of the RCFE Building behind the Redondo Village Shopping Center would create a terraced effect with the building height decreasing from the campus to the Redondo Village Shopping Center and ultimately further down to the residential land uses on the north side of Beryl Street.<br>The design of the proposed Project includes multiple buildings separated by a central lawn and landscaped pedestrian pathways to allow various access points throughout the Project site. The proposed buildings would be of varying heights and would provide open terraces to minimize the potential impacts associated from a pedestrian perspective. The Planning Commission Design Review would further refine the final design of Phase 1 and Phase 2 such that the development would be consistent with the objectives and policies in the Redondo Beach General Plan Land Use Element including Policy 1.46.4. |

**Table 3.1-2. Potential Conflict with the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ Policies and Residential Design Guidelines for Multi-Family Residential (Continued)**

| Policies | Discussion |
|---|---|
| **Policy 1.46.5.** Require, where the City has jurisdiction, that public sites be designed to incorporate landscaped setbacks, walls, and other appropriate elements to mitigate operational and visual impacts on adjacent land uses. | **No Conflict.** As described for Policy 1.46.5, the proposed buildings would meet the setback requirements prescribed for development in a parcel zoned for C-2. Additionally, the proposed Project would be subject to a Planning Commission Design Review, ~~consist~~consistent with requirements for development in a parcel zoned for P-CF. The proposed RCFE Building has been sited along the northern perimeter of the Project site behind the Redondo Village Shopping Center. This would create a terraced effect with the building height decreasing from the campus to the Redondo Village Shopping Center and ultimately further down to the residential land uses on the north side of Beryl Street. This proposed orientation would reduce the perceived bulk, mass, and scale of development when viewed from Beryl Street. Additionally, the location of the proposed RCFE Building along the northern perimeter of the Project site would reduce the visual impact on the adjacent land uses to the west along North Prospect Avenue and to the east in the Torrance neighborhood. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening and soften the views of the campus (refer to Figure 2-9). Similarly, the northern border of the campus would be lined with shade and flowering ornamental trees to soften the views from the Redondo Village Shopping Center. The Planning Commission Design Review would further refine the final design of Phase 1 and Phase 2 such that the proposed development would be consistent with the objectives and policies in the Redondo Beach General Plan Land Use Element including Policy 1.46.5. |
| **Policy 1.53.6.** Require that on-site parking structures be designed as an integrated component of the building's architectural design character; including the incorporation of elements which continue and reinforce the architectural design of the primary structure and convey the visual *"sense"* of an occupied building (use of windows, arcades, overhangs, entries, recessed walkways, spandrels, articulated columns and rooflines, and other elements). | **No Conflict.** The proposed parking structure in the Phase 2 development program would be constructed with similar materials and would feature a similar contemporary design with modulated façades that would be consistent with the rest of the proposed development in Phase 1 and Phase 2. The design remains conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to design review by the Redondo Beach Planning Commission. Therefore, the proposed Project would be consistent with the objectives and |

**Table 3.1-2. Potential Conflict with the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ Policies and Residential Design Guidelines for Multi-Family Residential (Continued)**

| Policies | Discussion |
|---|---|
| | policies in the Redondo Beach General Plan Land Use Element including Policy 1.53.6 |
| **Policy 1.53.10.** Require that all building facades visible from public streets and abutting properties be designed to continue the architectural character established for the street facing elevations. | **No Conflict.** Refer to the discussion for Policy 1.46.5, Policy 1.46.6, and Policy 1.53.6. |
| **Policy 1.53.11.** Require that air conditioning and other mechanical equipment located on the rooftop of a structure be visually screened from public viewing areas and adjacent residential properties. | **No Conflict.** Mechanical equipment included in the proposed Project would be located on the rooftop of the proposed buildings and screened in compliance with RBMC Section 10-2.1530. The proposed mechanical equipment would be sited away from public streets and screened by proposed devices consistent with the architecture and color of the proposed buildings. Therefore, the proposed Project would be consistent with the objectives and policies in the Redondo Beach General Plan Land Use Element including Policy 1.53.11. |
| ~~***Parks and Recreation Element Policies***~~ | |
| ~~**Policy 8.2a.8.** Preserve and enhance unique and valuable community resources as part of the planning and development of parks and recreation areas. Such resources include significant scenic and visual resources; cultural/historic resources; and natural resources such as water features, wildlife habitats, and native vegetation.~~ | ~~**No Conflict.** As described in the *Screened-out Thresholds*, no rock outcroppings or historic resources exist on the Project site. Further, as described in Section 3.3, *Biological Resources*, no native habitats exist within the campus. At least some of the existing landscaping could be protected in place. For example, the proposed Project would not remove the existing paperbark trees (*Melaleuca* spp.) and other landscaping along the North Prospect Avenue sidewalk. The proposed Project would remove portions of the existing landscaping during construction to facilitate demolition, excavation, and construction of the proposed Project. However, the proposed Project would also provide ground level and podium level landscaping to soften the views of the proposed development and enhance the visual character and pedestrian experience. While the proposed Project would change views of the Project site from the two locally designated historic structures within Dominguez Park, the proposed Project would not adversely affect the surrounding environment or any of the character defining features of the Morell House or Queen Anne House (see Section 3.4, *Cultural Resources and Tribal Cultural Resources*). No water features exist at or in the immediate vicinity of the Project site. Therefore, the proposed Project would be consistent with the objectives and policies in the Redondo Beach General Plan Parks and Recreation Element including Policy 8.2a.8.~~ |

**Table 3.1-2. Potential Conflict with the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ Policies and Residential Design Guidelines for Multi-Family Residential (Continued)**

| Policies | Discussion |
|---|---|
| ***Residential Design Guidelines for Multi-Family Residential*** | |
| **Policy 1.B.** Existing site amenities should be preserved and incorporated within new multi-family projects whenever feasible. | **Consistent.** The existing campus is landscaped with low-lying shrubs and grasses, such as Bermuda grass (*Cynodon dactylon*) and crab grass (*Digitaria* spp.), and a variety of trees, including paperbark trees, Mexican fan palms (*Washingtonia robusta*), and silver dollar eucalyptus (*Eucalyptus cinerea*) (see Section 3.3, *Biological Resources*). As previously described, landscaping within the Project site – including many of the trees along the eastern boundary of the Project site – would require removal to facilitate demolition, excavation, and construction of the proposed Project. However, the proposed Project would replace these trees with ground level and podium level landscaping to soften the views of the proposed development to enhance the visual character and pedestrian experience surrounding and within the Project site. The proposed Project would also landscape the vacant Flagler Lot, which is currently characterized by ruderal, weedy vegetation. Therefore, the proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 1.C.** Mature trees and similar natural amenities unique to the site should be preserved and incorporated into development proposals whenever possible. | |
| **Policy 1.E.** New landscaping should complement existing landscape materials, location, and massing on adjacent established developments where appropriate. | **No Conflict.** The proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees consistent with the existing landscaping on-site and in the vicinity (refer to Figure 2-9). As such, the proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 2.A.** Appropriate building siting should be used to reduce the perception of bulk, maximize open space, increase pervious areas and provide community-gathering spaces. | **No Conflict.** The proposed Project considers sunlight patterns in its design to allow light and air to penetrate the interior spaces between the proposed buildings and sensitive uses in the vicinity. Shadow-sensitive uses, such as the single-family Torrance residences, Towers Elementary School, and Dominguez Park would be shaded beyond existing shadows cast by the existing buildings on the campus. However, these worst-scenario shadows would form in the evening hours (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter) and would not adversely affect shadow-sensitive uses in the vicinity of the Project site. See Impact VIS-3 for further discussion of potential impacts to shade and shadows as well as solar access. The proposed Project would be consistent with the objectives and policies in |
| **Policy 2.B.** Buildings should be generally oriented parallel to streets with varying setbacks to provide visual interest, vary shadow patterns, and reduce the appearance of bulk. | |

**Table 3.1-2. Potential Conflict with the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ Policies and Residential Design Guidelines for Multi-Family Residential (Continued)**

| Policies | Discussion |
|---|---|
| | the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 2.D.** Buildings should be oriented to take advantage of prevailing breezes and direction of the sun in order to provide natural lighting and ventilation for open spaces. | **No Conflict.** The proposed Project would develop active green open space in the interior of the campus. As described in Section 2.5.1.5, *Sustainability Features*, the proposed Project would increase operable windows to take advantage of ventilation. Additionally, the proposed Project would take advantage of opportunities for controlled natural lighting. The orientation of the proposed development would shelter the interior of the campus from the traffic and associated noise along North Prospect Avenue and Beryl Street. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 3.B.** The design and orientation of common open spaces should take advantage of available sunlight and should be sheltered from the noise and traffic of adjacent streets or other incompatible uses. | |
| **Policy 3.D.** Private open space (such as a side yard, patio, balcony, etc.) should be contiguous to the units they are serve and screened from public view. | **No Conflict.** The proposed RCFE Building would provide private outdoor space (i.e., small balconies) for Assisted Living and Memory Care residents. Trees and other vegetation along the boundaries of the campus would establish a clear delineation between the Project site and the surrounding development and would screen the lower levels of the proposed development from public view. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 3.E.** Boundaries between common and private open space should be clearly defined by elements such as low walls, fences, and/or landscaping. | |
| **Policy 4.B.** Pedestrian paths should be provided to link dwelling units with common open space areas, common open space areas, parking areas and the street. Curvilinear paths provide a more inviting and interesting experience and are generally preferred over long, straight alignments. Paths, which traverse common open space areas, are encouraged. | **No Conflict.** The proposed Project would create a more open and pedestrian-oriented environment at the Project site by developing open space in the interior of the campus, with a central lawn and pedestrian pathways connecting the mix of uses on-site, parking areas, and the public sidewalks. The pedestrian pathways would meander throughout the open space and would be landscaped to provide more visual interest. The pathways would be equipped with low-lying nighttime lighting for safety and provide shaded seating at regular intervals. Further, the wide sidewalks along the North Prospect Avenue and Beryl Street would remain unchanged under the proposed Project. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 4.C.** Pedestrian paths should be safe, visually attractive, and well defined by landscaping and lights. Use of decorative pavement is encouraged. At a minimum, decorative paving should be used to delineate crossings at circulation drives and parking aisles. | |
| **Policy 5.D.** Boxy and monotonous facades that lack a sense of human scale and large expanses of flat wall planes are strongly discouraged. | **No Conflict.** Refer to the discussion for Policy 1.46.5, Policy 1.46.6, and Policy 1.53.6. |
| **Policy 5.E.** Portions of upper floors should be set back in order to scale down facades that face the street, | |

**Table 3.1-2. Potential Conflict with the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ Policies and Residential Design Guidelines for Multi-Family Residential (Continued)**

| Policies | Discussion |
|---|---|
| common open space, and adjacent residential structures. Upper story setbacks are recommended either as full length *"stepbacks"* or partial indentations for upper story balconies, decks, and/or aesthetic setbacks. | |
| **Policy 5.G.** Architectural elements such as bays, bay windows, recessed or projecting balconies, verandahs, balconies, porches and other elements that add visual interest, scale and character to the neighborhood are encouraged. | |
| **Policy 8.A.** Building materials should be durable, require low maintenance, and relate a sense of quality and permanence. Frequent changes in materials should be avoided. | **No Conflict.** Building design remains conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to the Planning Commission Design Review, which would ensure that the final design incorporate high quality building materials that are complementary and stylistically consistent across the campus. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 8.B.** Textures, colors and materials should unify the building and its elements. | |
| **Policy 8.F.** Exterior materials and architectural details should complement each other and should be stylistically consistent. | |
| **Policy 9.A.** Landscaped areas should generally incorporate plantings utilizing a three-tier system; 1) grasses and ground covers, 2) shrubs and vines, and 3) trees. | **No Conflict.** The proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 9.B.** Plant materials should be placed so that they do not interfere with lighting of the premises or restrict access to emergency apparatus such as fire hydrants or fire alarm boxes. Trees or large shrubs should not be planted under overhead lines or over underground utilities if their growth might interfere with such public utilities. | **No Conflict.** The landscaping design remains conceptual and specific plant materials and exact locations are still being refined and would be subject to the Redondo Beach Planning Commission Design Review Process. This review process along with the review of the landscaping plan by the Redondo Beach Building & Safety Division would ensure proposed landscaping is sited to avoid interference with lighting, emergency apparatus, or utilities in accordance with these design guidelines. Therefore, the proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 9.I.** Impervious surfaces should be minimized in all open space and setback areas. | **No Conflict.** The proposed Project would redevelop the site with greater active green space, landscaping, and grass-crete, which is a semi-permeable surface (refer to Figure 2-10). As such, the proposed Project would result in a net reduction in the total amount impervious surface (see Section 3.9, *Hydrology and Water Quality*). The proposed Project would be consistent with the objectives and policies in the |

**Table 3.1-2. Potential Conflict with the Redondo Beach General Plan Land Use Element ~~and Parks and Recreation Element~~ Policies and Residential Design Guidelines for Multi-Family Residential (Continued)**

| Policies | Discussion |
|---|---|
| | Residential Design Guidelines for Multi-Family Residential. |
| **Policy 9.J.** Landscaping shall emphasize water-efficient plants. | **No Conflict.** The proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees (refer to Figure 2-9). The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 10.L.A.** All lighting in parking areas should be arranged to prevent direct glare of illumination onto adjacent units. | **No Conflict.** As described further in Impact VIS-3, outdoor lighting would be shielded so as not to produce obtrusive glare onto the City-owned right-of-way or adjacent properties in accordance with RBMC Section 92.30.5 and these design guidelines. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 10.L.B.** The type and location of site and building lighting should preclude direct glare onto adjoining property, streets, or skyward. | |
| **Policy 10.L.C.** Pedestrian-scaled lighting should be located along all pedestrian routes of travel within multi-family communities. | **No Conflict.** The proposed pedestrian pathways within the interior of the Project site would be lit with low-lying downcast light in sufficient levels for public safety. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 10.L.D.** All lighting should be designed to shine downward and eliminate all skyward glare. | **No Conflict.** As described further in Impact VIS-3, outdoor lighting would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with RBMC Section 92.30.5 and these design guidelines. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 10.ME.A.** In addition to the following guidelines, mechanical equipment shall be screened as required pursuant to Section 10-2.1530 of the Zoning Ordinance. | **No Conflict.** Mechanical equipment included in the proposed Project would be screened in compliance with RBMC Section 10-2.1530. The proposed mechanical equipment would be sited away from public streets and would be screened by proposed landscaping and other screening devices consistent with the architecture and color of the proposed development. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. |
| **Policy 10.ME.B.** Utility meters, electric transformers, fire standpipes, water heaters and similar equipment should be placed in locations that are not exposed to view from the street or they should be suitably screened. | |
| **Policy 10.ME.C.** All screening devices are to be compatible with the architecture and color of the adjacent buildings. | |

*Consistency with City of Torrance Policies*

As described in Section 2.2.1, *Project Location*, the proposed Project would extend into the City of Torrance right-of-way at three locations. The proposed Project includes two access points with driveways along Flagler Lane. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed for a subterranean service area and loading dock entry/exit, which would require grading and construction of retaining walls (see Section 2.5.1.3, *Proposed Access, Circulation and Parking*). These elements of the proposed Project would require grading and building permits from the City of Torrance (refer to Section 1.5, *Required Approvals*).

The proposed Project would also re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The proposed grading and landscaping on this portion of the slope would also require a grading permit, landscape plan approval, and site plan review from the City of Torrance in accordance with Torrance General Plan Land Use Element Policy LU.2.5 (refer to Section 1.5, *Required Approvals*).

As such, the analysis of potential conflicts with the Torrance General Plan is limited to the proposed development within the City of Torrance right-of-way.

## Table 3.1-3. Consistency with Torrance General Plan Policies

| Objectives | Discussion |
|---|---|
| ***Land Use Element*** | |
| **Policy LU.2.1.** Require that new development be visually and functionally compatible with existing residential neighborhoods and industrial and commercial areas. | **No Conflict.** Development within the City of Torrance right-of-way would be limited to the proposed pick-up/drop-off loading zone exit as well as the subterranean service area and loading dock entry/exit. The subterranean service entrance would require the construction of retaining walls, which would require a grading and building permit from the City of Torrance. Additionally, the proposed Project would re-landscape the east portion of the campus to be consistent with the proposed landscape within the remainder of the campus. This proposed construction of retaining walls, a paved driveway, and landscaping would not be incompatible or inconsistent with the Torrance neighborhood to the east, particularly given that the existing slope is already characterized by a series of wooden retaining walls, maintaining the slope. The landscaping would serve to help screen and soften the view of the proposed RCFE Building in Redondo Beach.<br>It should also be noted that the RCFE Building has been sited along the northern perimeter of the Project site in an effort to minimize the potential visual effect on the Torrance neighborhood to the east.<br>The proposed Project would not conflict with any of these policies from the Torrance General Plan Land Use Element. |
| **Policy LU.2.2.** Encourage the transition of incompatible, ineffective, and/or undesirable land uses to land uses that are compatible and consistent with the character of existing neighborhoods. | |
| **Policy LU.3.1.** Require new development to be consistent in scale, mass and character with structures in the surrounding area. For distinct neighborhoods and districts, consider developing design guidelines that suit their unique characteristics. Create guidelines that offer a wide spectrum of choices and that respect the right to develop within the context of existing regulations. | |
| **Policy LU.5.1.** Require that new residential development be visually and functionally consistent in scale, mass, and character with structures in the surrounding neighborhood. Encourage residential development that enhances the visual character, quality, and uniqueness of the City's neighborhoods and districts. | |
| ***Community Resources Element*** | |
| **Policy CR.1.1.** Continue to evaluate the environmental impact of public and private projects on properties that have significant open space value. | **No Conflict.** The existing City of Torrance right-of-way is located along the eastern slope of the Project site. However, given the steepness of the slope this area is not considered to be a significant public open space. Re-landscaping within this area would ensure consistency with the proposed landscaping within Redondo Beach and would further help to soften and screen views of the Beach Cities Health Center.<br>It should also be noted that the proposed Project as a whole would provide a variety of active and passive open space areas within the Project site, including a central lawn and landscaped walkways within the interior of the campus.<br>Within the interior of the campus, the central lawn would support outdoor community events such as movie nights. The lawn would also support group classes associated with the CHF for up to 200 people. A flexible use platform would provide additional space for group exercise classes or small performances. Sensory gardens would include water features and sculptures, shaded intimate gathering areas for small groups, butterfly habitat, and a walking labyrinth. A tree-lined pedestrian promenade (Main Street) could support outdoor farmers' |
| **Policy CR.1.2.** Require the provision of on-site open space in new developments. | |
| **Policy CR.1.3.** Require that development projects involving modifications or additions include plans to upgrade or add open space and landscaping. | |
| **Policy CR.3.1.** Maximize open space for active and passive recreational uses at strategic and convenient locations throughout the City. | |
| **Policy CR.3.5.** Encourage the multiple use of open space land for recreational purposes. | |
| **Policy CR.3.6.** Require greater creativity and flexibility in the design of residential developments to encourage the provision of more usable on-site open space. | |
| **Policy CR.3.8.** Look for opportunities to create neighborhood pocket parks and similarly scaled recreation and cultural facilities that complement larger active park areas. | |

## Table 3.1-3. Consistency with Torrance General Plan Policies (Continued)

| Policies | Discussion |
|---|---|
| | markets and health fair expositions. At its eastern terminus, the pedestrian promenade would become the Wellness Walk, a distinct loop with distance markers, signage, and fitness stations. The proposed Project would also upgrade and relocate BCHD's existing Demonstration Garden.<br>The proposed Project would also incorporate several open space areas into and surrounding the proposed RCFE Building. ~~The RCFE Building would feature two dining terraces, including one on the south side of the building facing the central lawn and a larger landscaped dining terrace above the PACE service on the north side of the building.~~<br>The proposed Project would not conflict with any of these policies from the Torrance General Plan Land Use Element. |
| **Policy CR.4.2.** Require that developers and property owners improve their properties by providing landscaping and similar aesthetic treatments along roadways. | **No Conflict.** The proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees. The landscaping design remains conceptual and specific plant materials and exact locations are still being refined. The final landscaping plan for the City of Torrance right-of-way would be subject to review and approval by the Torrance Building & Safety Division. |
| **Policy CR.4.3.** Encourage planting of new trees, and preserve existing street trees in residential neighborhoods. | |
| **Policy CR.19.1.** Make the preservation of scenic vistas an integral factor in land development decisions. | **No Conflict.** As described in Section 3.1.3, *Impact Assessment and Methodology*, the Project site – including the City of Torrance right-of-way – is not located within a scenic view corridor established in the Torrance General Plan. Additionally, views of the existing campus from the east in Torrance are limited to open sky above the adjacent low-rise development. As such, the views of the Project site generally lack scenic qualities (e.g., distant views of the Project site or views of natural features including the ocean or mountains).<br>The proposed Project would not conflict with any of these policies from the Torrance General Plan Land Use Element. |
| **Policy CR.20.1.** Establish regulations for private lighting that minimize or eliminate light pollution, light trespass, and glare (obtrusive light). | **Consistent.** As described further in Impact VIS-3, outdoor lighting would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with TMC Section 92.30.5 and these design guidelines. Lighting onsite would also be screened by proposed trees and landscaping.<br>The proposed Project would not conflict with any of these policies from the Torrance General Plan Land Use Element. |
| **Policy CR.20.2.** Require that nonresidential uses adjacent or near residential neighborhoods provide shielding or other protections from outdoor lighting and lighted signage. | |

Impact Description (VIS-3)

*c) The project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.*

**VIS-3 The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would create new sources of exterior lighting. Additionally, building materials used in the construction of the proposed buildings could result in new sources of glare. However, through the conformance of the proposed Project with the Redondo Beach Municipal Code (RBMC) and the Torrance Municipal Code (TMC), impacts associated with the proposed Project would be *less than significant*.**

*Light and Glare*

As described in Section 2.5.1.6, *Construction Activities* construction activities at the campus would occur between the hours of 7:30 a.m. and 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday. As such, exterior construction lighting would generally not be required. If necessary, during the winter when the sun sets earlier or if otherwise necessary for security purposes, lighting would be shielded and directed into the interior of the Project site. Security fencing and the noise barriers required under MM NOI-1 would screen light sources from view of nearby sensitive receptors (e.g., neighboring single- and multi-family residences) and other passersby. Thus, temporary lighting associated with construction activities would not adversely affect daytime or nighttime views in the area.

As described in Section 3.1.1, *Environmental Setting*, existing uses in the immediate vicinity of the Project site contribute to nighttime lighting that is characteristic of suburban environment. The primary light sources in the immediate vicinity include exterior lighting associated with the neighboring single and multi-family residential uses as well as the Redondo Village Shopping Center and the campus. Additionally, streetlights are regularly spaced along North Prospect Avenue, Beryl Street, and Flagler Lane. Vehicle headlights along North Prospect Avenue and Beryl Street, and to a lesser extent Flagler Lane also present a steady source of light during the evening hours.

The proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program, would eliminate sources of light associated with the existing Beach Cities Health Center as well as the surface parking lots and perimeter circulation road. These light sources would be replaced by the 6-story RCFE Building during Phase 1, which would introduce new sources of light and glare to the Project site. Additionally, Phase 2 would result in the

construction of an additional multi-story building(s) and a parking structure that would also introduce new sources of light.

The proposed Project would increase lighting associated with interior building illumination and outdoor lighting for nighttime security and wayfinding around and through the campus. Interior lighting would be designed with occupancy sensors and dimmers, where feasible and appropriate. Additionally, during the evening hours, interior lighting associated with the Assisted Living and Memory Care units would be muted as a result of interior blinds, curtains, and other shades. Outdoor ground floor illumination would be limited to the entry plaza, outdoor seating areas, and pedestrian pathways. Lighting in these areas would be low lying and directed toward the ground. As such, outdoor ground lighting would generally be contained within interior spaces of the Project site. Exterior outdoor lighting would also be further muted by proposed landscaping along the perimeters of the Project site. Vehicle headlights from the proposed driveway exits onto Flagler Lane would constitute a new source of light directed toward the residential uses in Torrance. However, service deliveries would not occur during the evening hours. Additionally, pick-ups and drop-offs during the evening hours would also be few. Further direct light from vehicle headlights would be blocked by the concrete wall along Flagler Lane. While indirect light may be visible from the second stories, this would be similar in intensity to the exterior lighting associated with the existing development on the campus and in the surrounding vicinity (e.g., security lighting within the surface parking lots on the campus and the Redondo Village Shopping Center).

Lighting associated with the proposed Project would generally be similar in type and intensity to the lighting sources surrounding the Project site. The nearest light-sensitive receptors to the Project site include the multi-family residences to the north of Beryl Street and the single-family residences to the east of Flagler Lane. Dominguez Park to the northeast would also experience an increase in light intrusion from the Project. However, the lighting associated with the proposed RCFE Building would comply with Redondo Beach Residential Design Guidelines for Multi-Family Residential, which require that the type and location of building lighting preclude direct glare onto adjoining property, streets, or skyward, and all lighting be designed to shine downward. Lighting within the City of Torrance right-of-way would also comply with TMC Section 92.30.5, which limits the intensity and impacts of night lighting and requires lighting be directed away from all surrounding residential land uses. Compliance with the Redondo Beach Design Guidelines and the TMC would ensure the new light sources associated with the proposed Project would not substantially affect off-site light-sensitive receptors.

New sources of vehicle headlights at the Project site would largely be confined to the proposed surface parking lot during Phase 1 and the parking structure during Phase 2. The surface parking lot would be accessed from the existing driveways along North Prospect Avenue, where vehicle

headlights are already common. Additionally, the single- and multi-family residences along North Prospect Avenue are set back along a frontage road and separated from North Prospect Avenue by a 6- to 8-foot hedge. As such, the surface parking lot developed during Phase 1 would not result in a substantial new source of light that would affect adjacent sensitive receptors. The parking structure developed in Phase 2 of the proposed Project would rise to a maximum height of 81 feet and would be visible by the adjacent sensitive receptors to the east within Torrance. However, the parking structure would include standard treatments to avoid light spillover, including: 1) solid parapet walls at least 42 inches high at each garage level and ramps; 2) planted screening at lower floor levels; and 3) screening at openings for upper levels. Additionally, as with the development during Phase 1, the development during Phase 2 – including the proposed parking structure – would be subject to Planning Commission Design Review and final design review by the Redondo Beach Building & Safety Division prior to issuance of building permits. Compliance with the Redondo Beach Design Guidelines and the TMC would ensure the new light sources associated with the proposed Project would not substantially affect light-sensitive receptors.

The proposed Project may also include new sources of glare associated with glazing (windows) and other reflective materials used in the façade of the proposed structures, which could potentially result in increased glare emanating from the Project site. The building design details remain conceptual and specific colors, siding, windows, and overall materials are still being refined; however, the exterior of the proposed building shall be constructed of low- or no-glare materials, such as high-performance tinted non-reflective or non-mirrored glass and low reflective surfaces, with Light Reflective Values of less than 35 percent. Additionally, the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. Due to the proposed increase in building mass and size, it is expected that the Project would include a greater number of windows and reflective surfaces than the existing Project site. The reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare effects on public views.

For the reasons described above, the proposed Project would not constitute a new source of substantial nighttime light pollution or glare; therefore, effects would be *less than significant*.

Impact Description (VIS-4)

*Would shadow-sensitive uses be shaded by project-related structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).*

**VIS-4 The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development plan – would result in additional shading of adjacent properties. However, the extent and duration of shading would be *less than significant.***

Potential shading effects of the proposed Project would vary widely depending upon time of day and year. Shadow effects are magnified during the winter, when the sun's lower position in the sky creates longer shadows. For example, according to the accepted shadow length multipliers for the City of Los Angeles, a ~~121.5~~100-foot-tall building would create morning and afternoon shadows that would reach approximately ~~404.5~~ 303 feet in length during the Winter Solstice; the same building would create shadows that would reach approximately ~~291~~ 218 feet at the same times during the Summer Solstice (City of Los Angeles 2006). Winter is also when maximum solar access is more important to solar energy and passive heat production. For the purposes of this EIR analysis, Winter Solstice is considered the most severe condition for shade and shadow impacts.

The proposed 6-story RCFE Building would reach a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below. This would be the tallest building included in either Phase 1 or Phase 2 of the Master Plan, casting shadows up to 404.5 feet long during the Winter Solstice. Therefore, the proposed Project would create longer and more extensive shadows than the existing buildings on the campus.

Shadow-sensitive land uses adjacent to the Project site ~~would~~ consist of residential buildings, including windows and private yards at most houses, Towers Elementary School to the east, and Dominguez Park to the northeast. The shade and shadow study prepared for the proposed Project demonstrate that the adjacent residential structures in Torrance, including on Towers Street, Tomlee Avenue, Mildred Avenue, and Redbeam Avenue would be shaded beyond existing shadows, particularly during the Fall and Winter evenings during Phase 1 and Phase 2 (see Appendix M). However, the vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (see Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions

(refer to Figure 3.1-2) given the difference in elevation between the campus and the Torrance residences below.

The multi-family residential buildings adjacent to the north of the Project site would be shaded by the proposed RCFE Building beyond existing shadows during the early morning hours (i.e., 8:00 a.m. or earlier) in the Winter, due to the proximity of the residences to the Project site. However, by 10:00 a.m., the multi-family residences would not be shaded. Further, the proposed RCFE Building would not cast shadows over these residences in the Spring, Summer, and Fall (refer to Figure 3.1-3).

During the Fall and Winter, the proposed RCFE Building would also cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). The latest dismissal time for Towers Elementary School students is at 3:12 p.m. for 4$^{th}$ and 5$^{th}$ graders; however, and Towers Elementary School closes at 4:00 p.m. Therefore, shadows cast by the proposed RCFE Building would not have a significant adverse effect on Towers Elementary School.

Based on the shade and shadow study prepared for the proposed Project, the RCFE Building would also cast shadows along the southern edge of Dominguez Park during the evening hours (i.e., after 4:00 p.m.) in the Winter. However, the portion of Dominguez Park that would be shaded is comprised of a steep vegetated slope that does not provide any recreational opportunity and is fenced off from the rest of the park to the north. Consequently, the proposed Project would not generate shading that would affect shadow-sensitive receptors at Dominguez Park.

Shadow-sensitive uses would not be shaded by the proposed structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be *less than significant*.

<u>Implementation of MM VIS-1, which would reduce the height of the proposed RCFE Building, would also reduce shadows cast by the proposed RCFE Building onto adjacent uses, further reducing the already less than significant for shade and shadow impacts associated with the Phase 1 preliminary site development plan.</u>

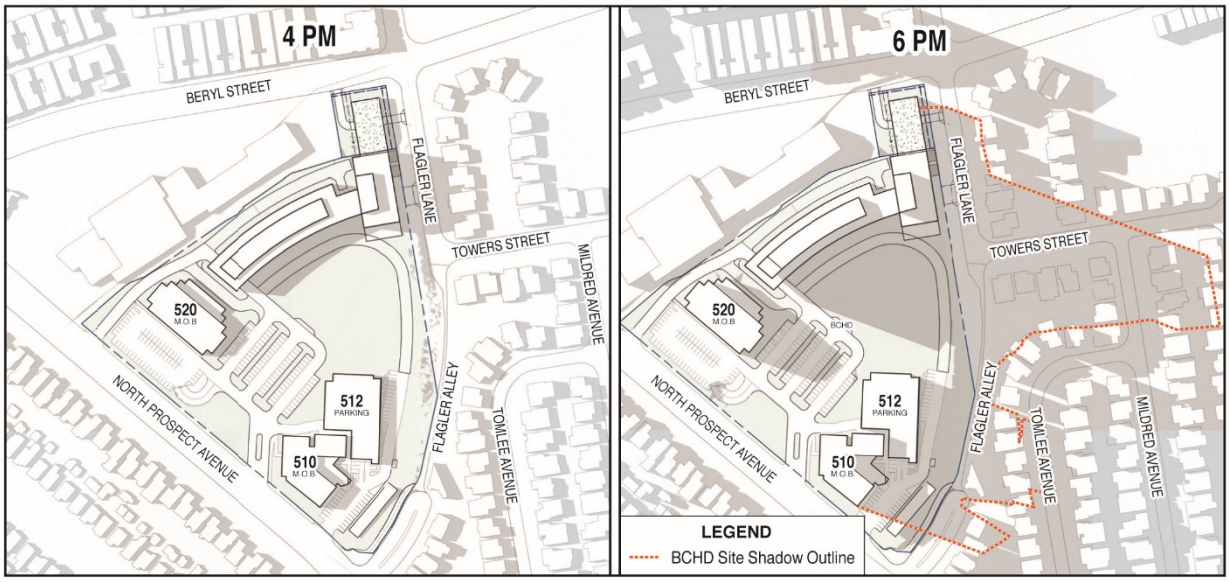
A shade and shadow study was also prepared for the Phase 2 development assuming a maximum height of the parking structure of 81 feet (see Appendix M). As with the Phase 1 development, shadow-sensitive uses would not be affected by shadows from structures developed under Phase 2 for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m.

Pacific Daylight Time (between early April and late October) shade and shadow impacts would be *less than significant*.

Cumulative Impacts

The visual character of the Project vicinity is not expected to change substantially over time, given that the Project site is located in a primarily suburban neighborhood, surrounded by single- and multi-family residences, elementary schools, and public parks, with some neighborhood-serving commercial uses (i.e., Redondo Village Shopping Center) to the north. Additionally, the nearest cumulative projects to the Project site are the Dominguez Park improvements and Redondo Beach Police Department (RBPD) shooting range upgrade. As such, none of the cumulative projects that would be visible from the Project site would result in visual changes that would contribute to adverse visual character changes in the Project vicinity. None of the cumulative projects that would be visible from the Project site would result in taller structures that would affect shade and shadows in the Project vicinity. Further, all new projects in the vicinity would be required to adhere to regulations of the RBMC or TMC, and would be required to undergo plan review by the respective City Planning Commission and City Council. Thus, although the visual character could change as development intensity increases, the impact to visual quality would not be considered substantially adverse.

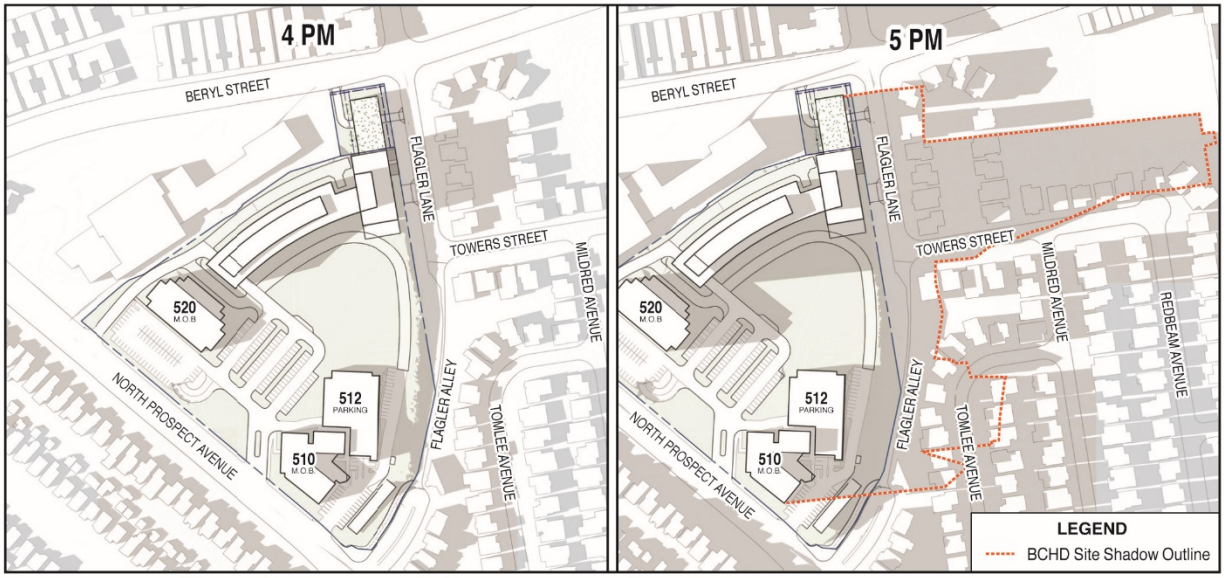
As with the proposed Project, cumulative projects would introduce new lighting sources. However, new development would be subject to design review and approval by the respective City staff to ensure compliance with local regulations. Compliance with the RBMC and TMC would reduce potential impacts associated with light spillover. With adherence to applicable local regulations addressing aesthetics, visual resources, light and glare, and shade and shadows, impacts would be less than significant. Therefore, the proposed Project *would not substantially contribute to a cumulatively considerable impact* to aesthetics and visual resources in the Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach.




wood.

**Summer Solstice with the Implementation of Phase 1**

**FIGURE 3.1-5**

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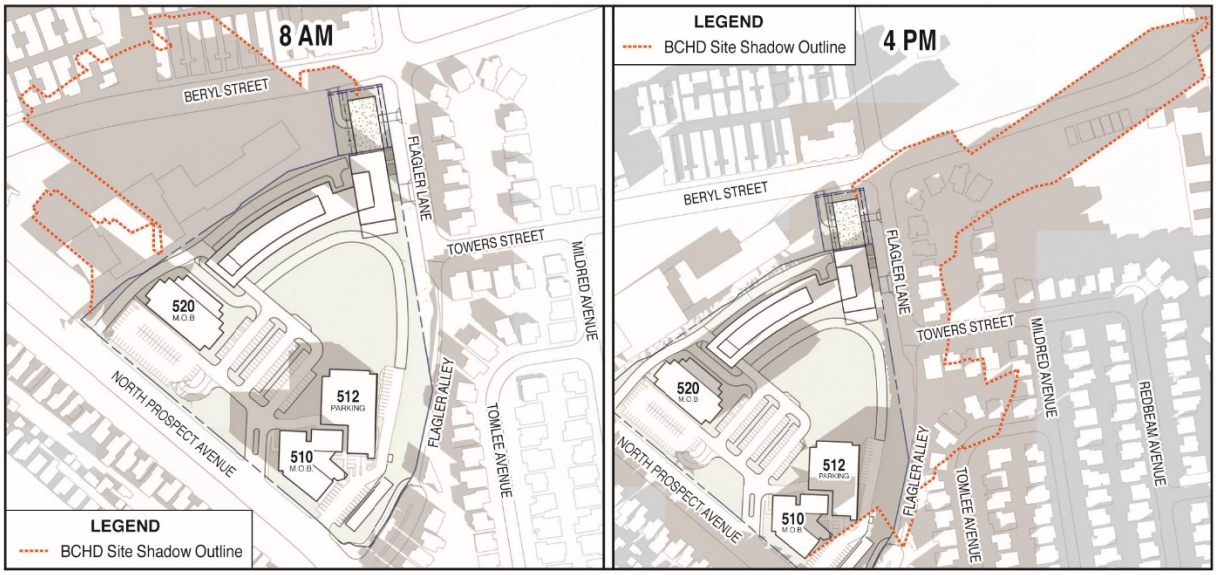
**Fall Equinox with the Implementation of Phase 1**

**FIGURE 3.1-6**




wood.

**Winter Solstice with the Implementation of Phase 1**

**FIGURE 3.1-7**

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## 3.2 AIR QUALITY

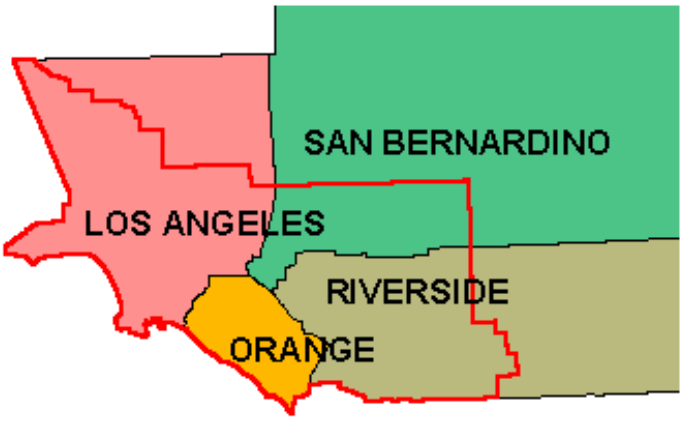
This section of the Environmental Impact Report (EIR) describes the existing air quality conditions in the South Coast Air Basin (Basin) – which encompasses most of Los Angeles County, including Redondo Beach, Torrance, and the Project site – and evaluates the potential impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan Project (Project). This discussion includes an assessment of both short-term construction and long-term operational air emissions generated by the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program. Information for this section was derived from the U.S. Environmental Protection Agency (USEPA), California Air Resources Board (CARB), and South Coast Air Quality Management District (SCAQMD). Air Quality modeling was prepared using the California Emission Estimator Model (CalEEMod) Version 2016.3.2 (see Appendix B). An analysis of greenhouse gas (GHG) emissions and associated impacts is included in Section 3.7, *Greenhouse Gas Emissions and Climate Change*.

### 3.2.1 Environmental Setting

#### 3.2.1.1 Location and Climate

The South Coast Air Basin is bounded by the Pacific Ocean to the west, and the San Gabriel, San Fernando, and San Jacinto Mountains to the north and east. The topography defining the Basin traps air in the valleys below, making the Basin an area of high air pollution potential.

**South Coast Air Basin**




*The South Coast Air Basin includes Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside counties.*

Redondo Beach and Torrance have a Mediterranean coastal climate with warm, dry summers and mild, cool winters. The average annual temperature recorded at Torrance Municipal Airport is 62.6 degrees Fahrenheit (°F), with a monthly average maximum temperature of 77.8 °F in August and a monthly average minimum temperature of 46.2 °F in December. The average annual rainfall in the region is approximately 14.45 inches per year, with the majority of

annual rainfall occurring between December and March (National Climatic Data Center [NCDC] 2010).

The Basin frequently experiences weather conditions that trap air pollutants within the Basin. First, the Basin has persistent temperature inversions formed by warmer air in the upper layer and cooler air in the lower layer. Temperature inversions limit the vertical dispersion of air contaminants, holding them relatively near the ground. These inversions break when the sun heats the lower layer, allowing the two layers to mix and the previously trapped air to leave the Basin. Second, the Basin experiences periods of stagnant wind conditions, which also limit the movement of air pollutants. The combination of stagnant wind conditions and low temperature inversions produces the greatest pollutant concentrations, typically from June through September. Conversely, on days with no inversion (i.e., days with high wind speeds) air pollutant concentrations are the lowest. However, pollutant concentrations in the Basin also vary with location. Concentrations of ozone ($O_3$), for example, tend to be lower along the coast (i.e., within the vicinity of the Project site) and higher in the near inland valleys.

#### 3.2.1.2 Air Pollutants

Air pollutant emissions within the Basin are generated from several stationary, mobile, and natural sources, ranging from large power plants and manufacturing facilities to residential water heaters and consumer products. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with industry and manufacturing. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are more widely distributed. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products. Mobile sources, including motor vehicles, aircraft, trains, and construction equipment, account for most of the air pollutant emissions within the Basin. Construction activities that disturb the ground surface (e.g., excavation and grading) contribute to fugitive dust emissions within the Basin. Fugitive dust can also be generated naturally when strong winds pull fine dust particles off the ground surface into the air.

To protect the public health and welfare, the Federal and State governments have identified and regulate criteria air pollutants and certain air toxics. In California, these pollutants are regulated through the Federal Clean Air Act (CAA), which established the National Ambient Air Quality Standards (NAAQS), and the California Clean Air Act (CCAA), which established the more restrictive California Ambient Air Quality Standards (CAAQS) (see Table 3.2-1). The air pollutants for which both Federal and State standards have been promulgated and which are most

relevant to air quality planning and regulation in the air basin are ozone ($O_3$), carbon monoxide (CO), respirable particulate matter ($PM_{10}$), fine particulate matter ($PM_{2.5}$), nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), and lead (Pb). Toxic air contaminants (TACs), discussed below, are of particular concern in the Basin and are regulated separately from criteria air pollutants. The CAAQS regulate additional air pollutants that are not currently regulated by the NAAQS, including hydrogen sulfide ($H_2S$), vinyl chloride, and sulfates. These pollutants are described below (refer to Table 3.2-1 for Federal and State ambient air quality standards):

Ozone ($O_3$)

$O_3$ is a gas that is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides ($NO_x$) and volatile organic compounds (VOCs). $NO_x$ and VOCs are also commonly referred to as reactive organic gases (ROGs). $NO_x$ is formed during the combustion of fuels, while VOCs are formed during combustion and evaporation of organic solvents. Conditions that produce high concentrations of $O_3$ are direct sunshine, stagnation in source areas, high ground surface temperatures, and a strong inversion layer that restricts vertical mixing. $O_3$ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable.

$O_3$ is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors are the most sensitive to $O_3$.

Carbon Monoxide (CO)

CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest near congested transportation corridors and intersections, especially during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels.

The health effects of CO are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity, and impaired mental abilities. Those most at risk are fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (i.e., oxygen deficiency, as seen at high altitudes).

Respirable Particulate Matter ($PM_{10}$) and Fine Particulate Matter ($PM_{2.5}$)

$PM_{10}$ and $PM_{2.5}$ consist of extremely small, suspended particles with diameters less than 10 microns and less than 2.5 microns, respectively. $PM_{10}$ generally comes from fugitive dust (windblown dust and dust generated from mobile sources), while $PM_{2.5}$ is generally associated with combustion processes, it is also formed in the atmosphere as a secondary pollutant through chemical reactions. Most particulate matter in urban areas is produced by fuel combustion, motor vehicle travel, and construction activities.

*Fugitive dust can be controlled by applying water or other soil stabilizers to exposed soil surfaces daily during construction activities to avoid windblown dust.*

Children, the elderly, and people with pre-existing respiratory or cardiovascular disease appear to be more susceptible to the effects of high levels of $PM_{10}$ and $PM_{2.5}$. Potential impacts of elevated levels of $PM_{10}$ and $PM_{2.5}$ include increased mortality rates, respiratory infections, number and severity of asthma attacks, and number of hospital admissions. Daily fluctuations in $PM_{2.5}$ concentration levels have been related to hospital admissions for acute respiratory conditions in children, school absences, decreases in respiratory lung volumes in normal children, and increased medication use in children and adults with asthma. Recent studies show the development of lung function in children is reduced with long-term exposure to particulate matter.

Nitrogen Dioxide ($NO_2$)

$NO_2$ is a reddish-brown toxic gas with a characteristic sharp, biting odor and is a prominent air pollutant resulting from nitrogen oxides emitted primarily by motor vehicles, making it a strong indicator of vehicle emissions. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to $NO_2$ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to $NO_2$ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive

pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

Sulfur Dioxide ($SO_2$)

$SO_2$ is a colorless, extremely irritating gas or liquid. The largest sources of $SO_2$ are fossil fuel combustion at power plants and other industrial facilities. Smaller sources of $SO_2$ emissions include industrial processes such as extracting metal from ore, and the burning of high sulfur containing fuels by locomotives, large ships, and non-road equipment.

$SO_2$ is linked with adverse effects on the respiratory system. Asthmatics are particularly sensitive to $SO_2$, with only a few minutes of exposure to low levels of the gas potentially resulting in airway constriction.

Lead (Pb)

Pb occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles; therefore, most Pb combustion emissions are associated with aircraft, and some racing and off-road vehicles. Substantial Pb emissions also occur in the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters. Despite these sources, Pb emissions in the U.S. decreased by 99 percent from 1980 to 2015 (USEPA 2016).

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased levels of lead are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death.

Toxic Air Contaminants (TACs)

TACs are a diverse group of air pollutants including both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, heavy duty trucks, motor vehicles, construction equipment, and industrial operations. TACs are different than criteria pollutants in that ambient air quality standards have not been established for TACs, largely because there are hundreds of air toxics and their effects on health tend to be local rather than regional. CARB has designated nearly 200 compounds as TACs. Additionally, CARB has implemented control measures for many compounds that pose high risks and show potential for effective control.

TACs can cause chronic and acute adverse effects on human health. These health impacts include increased risk of cancer due to continual inhalation of toxic air pollutants. Most of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (i.e., diesel particulate matter [DPM]).

Volatile Organic Compounds (VOCs)

VOCs are organic chemicals that have a high vapor pressure at ordinary room temperature and include any compound of carbon, excluding CO, carbon dioxide ($CO_2$), carbonic acid ($H_2CO_3$), metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. The high vapor pressure of VOCs results from a low boiling point, which causes large numbers of molecules to evaporate or sublimate from the liquid or solid form of the compound and enter the surrounding air. For example, formaldehyde, which evaporates from paint, has a boiling point of only -2 °F.

VOCs are numerous, varied and ubiquitous, and include both human-made and naturally occurring chemical compounds. Most scents or odors are of VOCs. Some VOCs are dangerous to human health or cause harm to the environment. Anthropogenic VOCs are regulated by law, especially indoors, where concentrations are the highest. Harmful VOCs typically are not acutely toxic, but have compounding long-term health effects.

Odors

Odors are not regulated under the Federal CAA or CCAA; however, they are considered under the California Environmental Quality Act (CEQA). Odors can potentially affect human health in several ways. Odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Additionally, VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system.

According to the SCAQMD CEQA Air Quality Handbook (1993), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Major sources within Redondo Beach and Torrance include the AES Redondo Beach Power Plant. Other sources of odors may include odors from commercial kitchens, particularly those with outdoor grilling or wood burning ovens, as well as short term odors generated by construction activities such as painting and asphalt paving.

**Table 3.2-1. Federal and State Ambient Air Quality Standards for Criteria Pollutants**

| Criteria Pollutant | Averaging Time | California Standards | | National Standards |
|---|---|---|---|---|
| | | Concentration | Primary | Secondary |
| Ozone ($O_3$) | 1-Hour | 0.09 ppm (180 µg/m$^3$) | - | - |
| | 8-Hour | 0.07 ppm (137 µg/m$^3$) | 0.07 ppm (137 µg/m$^3$) | Same as Primary Standard |
| Respirable Particulate Matter ($PM_{10}$) | 24-Hour | 50 µg/m$^3$ | 150 µg/m$^3$ | Same as Primary Standard |
| | Annual Arithmetic Mean | 20 µg/m$^3$ | - | |
| Fine Particulate Matter ($PM_{2.5}$) | 24-Hour | - | 35 µg/m$^3$ | Same as Primary Standard |
| | Annual Arithmetic Mean | 12 µg/m$^3$ | 12 µg/m$^3$ | 15 µg/m$^3$ |
| Carbon Monoxide (CO) | 1-Hour | 20 ppm (23 mg/m$^3$) | 35 ppm (40 mg/m$^3$) | - |
| | 8-Hour | 9 ppm (10 mg/m$^3$) | 9 ppm (10 mg/m$^3$) | - |
| Nitrogen Dioxide ($NO_2$) | 1-Hour | 0.18 ppm (339 µg/m$^3$) | 100 ppb (188 µg/m$^3$) | - |
| | Annual Arithmetic Mean | 0.03 ppm (57 µg/m$^3$) | 0.53 ppb (100 µg/m$^3$) | Same as Primary Standard |
| Sulfur Dioxide ($SO_2$) | 1-Hour | 0.25 ppm (655 µg/m$^3$) | 75 ppb (196 µg/m$^3$) | - |
| | 3-Hour | - | - | 0.5 ppm (1,300 µg/m$^3$) |
| | 24-Hour | 0.04 ppm (105 µg/m$^3$) | - | - |
| Lead | 30 Day Average | 1.5 µg/m$^3$ | - | - |
| | Rolling 3-Month Average | - | 0.15 µg/m$^3$ | Same as Primary Standard |
| Sulfates | 24-Hour | 25 µg/m$^3$ | - | - |
| Hydrogen Sulfide ($H_2S$) | 1-Hour | 0.03 ppm (42 µg/m$^3$) | - | - |
| Vinyl Chloride | 24-Hour | 0.01 ppm (26 µg/m$^3$) | - | - |

Notes: ppm = parts per million; µg/m$^3$ = micrograms (one-millionth of a gram) per cubic meter of air.
Sources: CARB 2016.

### 3.2.1.3 Regional Air Quality

Measurements of ambient concentrations of criteria pollutants are used by the USEPA and CARB to assess and classify the air quality of each air basin, county, or, in some cases, a specific

developed area. The classification is determined by comparing monitoring data with Federal and State air quality standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in *"attainment."* If the pollutant exceeds the standard, the area is described as being in marginal, moderate, serious, severe, or extreme *"nonattainment,"* depending on the magnitude of the air quality standard exceedance. In order to reach attainment again, the NAAQS may not be exceeded more than once per year. A nonattainment area can reach attainment when the NAAQS have been met for a period of 10 consecutive years. During this time period, the area is in *"maintenance."* If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as *"unclassified."*

The entire Basin is designated as a Federal and/or State nonattainment area for $O_3$, $PM_{2.5}$, and $PM_{10}$. At the Federal level, the Basin is designated as a nonattainment area for $O_3$, Pb, and $PM_{2.5}$. The Basin is in attainment of Federal standards for $SO_2$ and $NO_2$, a subcategory of $NO_x$. At the State level, the Basin, including the Los Angeles County portion of the Basin, is also designated as a nonattainment area for $O_3$, $PM_{2.5}$, and $PM_{10}$. The Basin is in attainment for the State ambient air quality standards for CO, $NO_2$, and $SO_2$, and the Los Angeles County portion of the Basin is designated as attainment for Pb (CARB 2019a; USEPA 2019a).

**Table 3.2-2. Los Angeles County-South Coast Air Basin Federal and State Attainment Status for Criteria Pollutants**

| Criteria Pollutant | | Federal Designation | State Designation |
|---|---|---|---|
| Ozone ($O_3$) | 1-hour | Extreme Nonattainment | Nonattainment |
| | 8-hour | Extreme Nonattainment | Nonattainment |
| Particulate Matter ($PM_{10}$) | 24-hour | Attainment as Serious Maintenance Area | Nonattainment |
| | Annual | | |
| Particulate Matter ($PM_{2.5}$) | 24-hour | Serious Nonattainment | Nonattainment |
| | Annual | | |
| Carbon Monoxide (CO) | 1-hour | Attainment as Serious Maintenance Area | Attainment |
| | 8-hour | | |
| Nitrogen Dioxide ($NO_2$) | 1-hour | Attainment | Attainment |
| | Annual | - | - |
| Sulfur Dioxide ($SO_2$) | 1-hour | Attainment | Attainment |
| | 24-hour | | |
| Lead (Pb) | 30 day rolling average | - | Attainment |
| | 3 month rolling average | Nonattainment | - |
| Sulfates | | - | Attainment |
| Hydrogen Sulfide ($H_2S$) | | - | Attainment |
| Vinyl Chloride | | - | Attainment |

Sources: CARB 2019a; USEPA 2019a.

In an effort to monitor the various concentrations of air pollutants throughout the Basin, the SCAQMD operates 37 permanent monitoring stations and four single-pollutant source impact Pb air monitoring sites in the Basin and a portion of the Salton Sea Air Basin in Coachella Valley (i.e., Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties). The SCAQMD has divided the region into 38 source receptor areas (SRAs). Redondo Beach and Torrance – including the Project site – are located within SRA 3, which covers southwestern coastal Los Angeles County. Ambient air pollutant concentrations within SRA 3 are monitored at the 7201 West Westchester Parkway Monitoring Station, which is located approximately 7.57 miles north of the Project site. Of the six criteria air pollutants, ambient concentrations of CO, $O_3$, $NO_2$, $SO_2$, and $PM_{10}$ are monitored in SRA 3. Measurements for $PM_{2.5}$ are taken in SRA 4 at the South Long Beach 1305 East Pacific Coast Highway Monitoring Station. Table 3.2-3 provides a summary of ambient air quality measured within SRA 3 and 4 from 2015 to 2019 for all pollutants.[1] Since 2015, exceedances have occurred for the Federal and State 8-hour standards for $O_3$, the State 1-hour $O_3$ standard, the Federal 24-hour $PM_{2.5}$ standard, and the annual average standard for $PM_{10}$.

#### 3.2.1.4 CO Hotspots

Motor vehicles are the primary source of criteria pollutants in the vicinity of the Project site. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed Federal and/or State standards for CO are termed *"CO hotspots."* Section 9.14 of the SCAQMD CEQA Air Quality Handbook (1993) identifies CO as a *"localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots."* In the past, the SCAQMD recommended that a CO hotspot analysis should be conducted for intersections where a proposed project would have a significant traffic-related congestion impact causing the Level of Service (LOS) to change to E or F or when a project increases the volume to capacity ratio (V/C) increases by 2 percent and the LOS is D or worse. These recommendations were formulated several years ago when the Basin was a nonattainment area for Federal and State CO standards. The Basin is now in attainment of all applicable ambient CO standards – in 2019, the maximum 8-hour concentration of CO measured within SRA 3 was 1.3 parts per million (ppm) (refer to Table 3.2-3), which is well below the 9.0 Federal and State 8-hour standard (refer to Table 3.2-1).

[1] It should be noted that the closest SCAQMD monitoring stations are located at Los Angeles International Airport and Long Beach near major sources of criteria air pollutants. Redondo Beach and Torrance do not contain any major sources of criteria air pollutants; instead, air pollutant levels are affected mostly by large regional sources outside of the city limits.

## Table 3.2-3. Exceedances of Ambient Air Quality Standards for Criteria Pollutants

| Criteria Pollutant / Standards | Number of Days Threshold Was Exceeded and Maximum Levels During Violations | | | | |
|---|---|---|---|---|---|
| | 2015 | 2016 | 2017 | 2018 | 2019 |
| ***Ozone ($O_3$)*** | | | | | |
| State 1-Hour Standard: > 0.09 ppm | 1 day | 0 days | 0 days | 0 days | 0 days |
| State 8-Hour Standard: > 0.070 ppm | 3 days | 3 days | 0 days | 0 days | 0 days |
| Federal 8-Hour Standard: > 0.070 ppm | 3 days | 2 days | 0 days | 0 days | 0 days |
| Max. 1-Hour Conc. (ppm) | 0.096 ppm | 0.087 ppm | 0.086 ppm | 0.074 ppm | 0.082 ppm |
| Max. 8-Hour Conc. (ppm) | 0.077 ppm | 0.080 ppm | 0.070 ppm | 0.065 ppm | 0.067 ppm |
| ***Carbon Monoxide (CO)*** | | | | | |
| State 8-Hour Standard: > 9.0 ppm | 0 days | 0 days | 0 days | 0 days | 0 days |
| Federal 8-Hour Standard: > 9.0 ppm | 0 days | 0 days | 0 days | 0 days | 0 days |
| Max. 8-Hour Conc. (ppm) | 1.4 ppm | 1.3 ppm | 1.6 ppm | 1.5 ppm | 1.3 ppm |
| Max. 1-Hour Conc. (ppm) | 1.7 ppm | 1.6 ppm | 2.1 ppm | 1.8 ppm | 1.8 ppm |
| ***Nitrogen Dioxide ($NO_2$)*** | | | | | |
| State 1-Hour Standard: > 0.18 ppm | 0 days | 0 days | 0 days | 0 days | 0 days |
| Annual Average (ppm) | 0.11 ppm | 0.10 ppm | 0.09 ppm | 0.09 ppm | 0.10 ppm |
| Max. 1-Hour Conc. (ppm) | 0.09 ppm | 0.08 ppm | 0.07 ppm | 0.06 ppm | 0.06 ppm |
| ***Sulfur Dioxide ($SO_2$)*** | | | | | |
| State 1-Hour Standard: > 0.25 ppm | 0 days | 0 days | 0 days | 0 days | 0 days |
| State 24-Hour Standard: > 0.04 ppm | 0 days | 0 days | 0 days | 0 days | 0 days |
| Max. 24-Hour Conc. (ppm) | 0 days | 0 days | 0 days | 0 days | 0.001 ppm |
| Max. 1-Hour Conc. (ppm) | 0.015 ppm | 0.010 ppm | 0.010 ppm | 0.012 ppm | 0.004 ppm |
| ***Respirable Particulates ($PM_{10}$)*** | | | | | |
| State 24-Hour Standard: > 50 μg/m$^3$ | 0 days | 0 days | 0 days | 0 days | 2 days |
| Federal 24-Hour Standard: > 150 μg/m$^3$ | 0 days | 0 days | 0 days | 0 days | 0 days |
| Max. 24-Hour Conc. (μg/m$^3$) | 42.0 μg/m$^3$ | 43.0 μg/m$^3$ | 46.0 μg/m$^3$ | 45.0 μg/m$^3$ | 62.0 μg/m$^3$ |
| Annual Average Standard: 20 (μg/m$^3$) | 21.2 μg/m$^3$ | 21.6 μg/m$^3$ | 19.8 μg/m$^3$ | 20.5 μg/m$^3$ | 19.2 μg/m$^3$ |
| ***Fine Particulates ($PM_{2.5}$)*** | | | | | |
| Federal 24-Hour Standard: > 35 μg/m$^3$ | 3 days | 0 days | 4 days | 2 days | 0 days |
| Max. 24-Hour Conc. (μg/m$^3$) | 54.6 μg/m$^3$ | 29.4 μg/m$^3$ | 55.3 μg/m$^3$ | 46.4 μg/m$^3$ | 29.0 μg/m$^3$ |
| Annual Average (μg/m$^3$) | 10.8 μg/m$^3$ | 10.4 μg/m$^3$ | 10.9 μg/m$^3$ | 11.0 μg/m$^3$ | 9.23 μg/m$^3$ |

Notes: Ambient concentrations for CO, $O_3$, $NO_2$, $SO_2$, and $PM_{10}$ were measured at the Southwest Coastal Los Angeles County monitoring station (SRA 3). Ambient concentrations of $PM_{2.5}$, were measured at the South Coastal Los Angeles County monitoring station (SRA 4).
Source: CARB 2019b; SCAQMD 2019a.

#### 3.2.1.5 Sensitive Receptors

Sensitive receptors are populations that are more susceptible to the effects of air pollution than is the population at large. According to CARB, sensitive receptors include children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. The Federal and State ambient air quality standards are designed to protect public health and are generally regarded as conservative for healthy adults because there is greater concern to protect adults who are ill or have long-term respiratory problems, and young children whose lungs are not fully developed. The SCAQMD identifies the following as locations that may contain a high concentration of sensitive receptors; long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds and parks with active recreational uses, childcare centers, and athletic facilities.

The majority of development within Redondo Beach and Torrance consists of residential uses, including large single-family neighborhoods and multiple-family apartments and condominiums (see Section 3.10, *Land Use and Planning*), all of which are considered sensitive land uses with regard to air quality. Residential uses occur to the north, south, east, and west of the Project site as close as 80 feet to the Project site (i.e., to the extent of proposed construction activities). The following 11 schools within 0.5 miles (2,640 feet) of the Project site: Beach Cities Child Development Center (preschool), Towers Elementary School, Beryl Heights Elementary School, Redondo Shores High School, Redondo Beach Learning Academy, Redondo Union High School, Jefferson Elementary School, Parras Middle School, Our Lady of Guadalupe School, Valor Christian Academy, and West High School. There are also many public parks in the vicinity, including Dominguez Park, Sunnyglen Park, Entradero Park (see Table 3.2-4). The existing 60 Memory Care units associated with the Silverado Beach Cities Memory Care Community on the Project site would also be sensitive to construction emissions during construction activities associated with the Phase 1 preliminary site development plan.

## Table 3.2-4. Sensitive Receptors in the Vicinity of the Project Site

| Sensitive Receptors | Distance to the Project Site / Extent of Construction Activities (feet) |
|---|---|
| ***Residential Uses*** | |
| Silverado Beach Cities Memory Care Community (located on the BCHD campus) | 0 |
| West Torrance Residences (located east of the Project site) | 80 |
| Redondo Beach Residences (located north of the Project site) | 80 |
| Redondo Beach Residences (located west and south of the Project site) | 110 |
| ***Recreational Land Uses*** | |
| Dominguez Park/Redondo Beach Dog Park | 115 |
| Sunnyglen Park | 1,190 |
| Entradero Park | 1,390 |
| Perry Allison Playfield | 1,575 |
| Sea Hawk Stadium | 1,815 |
| Moondust Parkette | 2,590 |
| Edith Rodaway Friendship Park | 2,640 |
| ***Schools*** | |
| Beach Cities Child Development Center (preschool located on the BCHD campus) | 0 |
| Towers Elementary School | 350 |
| Beryl Heights Elementary School | 905 |
| Redondo Shores High School | 1,450 |
| Redondo Beach Learning Academy | 1,540 |
| Redondo Union High School | 1,730 |
| Jefferson Elementary School | 2,100 |
| Parras Middle School | 2,160 |
| Our Lady of Guadalupe School | 2,500 |
| Valor Christian Academy | 2,525 |
| West High School | 2,620 |
| ***Medical Facilities*** | |
| Outpatient Medical Offices (located on the BCHD campus) | 0 |

As shown in Table 3.2-4, the nearest sensitive receptors to the Project site are the Beach Cities Child Development Center, Silverado Beach Cities Memory Care Community, and outpatient medical offices located on the BCHD campus, as well as the single-family residences located as close as 80 feet to the Project site. See Table 3.11-5 and Figure 3.11-1 in Section 3.11, *Noise*, for additional descriptions and depictions of these sensitive receptors.

### 3.2.2 Regulatory Setting

Air quality within the Basin is addressed through the efforts of Federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the air basins are discussed below.

Federal Regulations

*Clean Air Act*

The Federal CAA was passed in 1963 and amended in 1990 and was the first comprehensive Federal law to regulate air emissions from stationary and mobile sources. Among other things, the CAA authorizes the USEPA to establish and enforce NAAQS for pollutants considered harmful to public health and the environment, including the six criteria air pollutants: CO, Pb, $NO_2$, $O_3$, $PM_{2.5}$ and $PM_{10}$, and $SO_2$. The NAAQS help to ensure basic health and environmental protection from air pollution. The CAA also gives USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

*U.S. Environmental Protection Agency*

Pursuant to the CAA, the USEPA must designate areas as meeting (i.e., in attainment) or not meeting (i.e., in nonattainment) the Federal standards for the six criteria air pollutants. As part of its enforcement responsibilities, the USEPA requires each State with Federal nonattainment area to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the Federal standards. The SIP must integrate Federal, State, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP. These plans are developed by State and local air quality management agencies and submitted to the USEPA for approval.

The USEPA has adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first Federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000. On August 27, 1998, the USEPA introduced Tier 1 standards for equipment under 37 kilowatts (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts).

Tier 3 standards for nitrogen oxides and hydrocarbons are similar in stringency to the 2004 standards for highway engines; however, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, the USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. Tier 4 standards require that emissions of particulate matter and $NO_x$ be further reduced by about 90 percent. Such emission reductions are achieved using control technologies, including advanced exhaust gas after-treatment, similar to those required by the 2007 to 2010 standards for highway engines.

State Regulations

*California Clean Air Act*

The CCAA requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. The CAAQS includes more stringent standards than the NAAQS.

*California Air Resources Board*

CARB, which is a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both Federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP for submission to the USEPA.

In April 2005, CARB published the Air Quality and Land Use Handbook: A Community Health Perspective, which serves as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions. The recommendations provided in the handbook are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions.

CARB has also established California Idling Regulations that restrict the idling of heavy-duty vehicles. In particular, the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling requires, among other things, that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle's primary diesel engine longer than 5 minutes at any location.

*California Air Toxics "Hot Spots" Information and Assessment Act*

The Air Toxic *"Hot Spots"* Information and Assessment Act (Air Toxic Hot Spots Act) identifies toxic air contaminant hot spots where emissions from specific stationary source facilities may expose individuals to an elevated risk of adverse health effects. It requires that a business or other establishment identified as a significant source of toxic emissions provide the affected population with information about health risks posed by the emissions. Health Risk Assessments (HRAs) identify the hazard or hazardous material, assess the amount, duration, and pattern of exposure to the hazard or hazardous material, assess the amount it would take to cause negative health effects, and characterize the risk to the general population and sensitive receptors from the hazard or hazardous material. The CalEPA's Office of Environmental Health Hazard Assessment (OEHHA) has published A Guide to Health Risk Assessment and The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments to aid California projects' compliance with the Air Toxic Hot Spots Act.

*CARB Off-Road Mobile Sources Emission Reduction Programs*

The CCAA mandates CARB to achieve the maximum degree of emission reductions from all off-road mobile sources in order to attain the State ambient air quality standards. Off-road mobile sources include heavy construction equipment. Tier 1, Tier 2, and Tier 3 standards for large compression-ignition engines used in off-road mobile sources went into effect in California for most engine classes in 1996, 2001, and 2006, respectively. Tier 4 or Tier 4 Interim (4i) standards apply to all off-road diesel engines model years 2012 or newer. In addition, equipment can be retrofitted to achieve lower emissions using the CARB-verified retrofit technologies. The engine standards and ongoing rulemaking jointly address the products of diesel combustion, including emissions and toxic diesel particulate matter. The California Emission Standards for Off-Road Compression-Ignition Engines are as specified in California Code of Regulations (CCR) Title 13, Division 3, Chapter 9, Article 4, Section 2423.

Regional Regulations

*South Coast Air Quality Management District*

The SCAQMD is the regional agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all Federal and State government agencies. Under Federal and State law, the SCAQMD is under a legal obligation to enforce air pollution regulations. These regulations

are primarily meant to ensure that the ambient air meets Federal and State air quality standards. In addition to developing rules and regulations, SCAQMD establishes permitting requirements, inspects emissions sources, and effectuates ongoing regional air quality improvements through a combination educational and penalty programs, including fines or sanctions when necessary. SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and natural sources.

*Air Quality Management Plan*

The SCAQMD maintains and periodically updates an Air Quality Management Plan (AQMP) for the Basin. The most recent of these is the 2016 AQMP, which was adopted by the Governing Board of SCAQMD on March 3, 2017. The 2016 AQMP was prepared to comply with the Federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high pollutant levels in the Basin, to meet Federal and State ambient air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy.

The 2016 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. The 2016 AQMP includes data to demonstrate attainment for the 2008 8-hour $O_3$ standard, the 2012 annual $PM_{2.5}$ standard, the 2006 24-hour $PM_{2.5}$ standard, the 1997 8-hour $O_3$ standard and the 1979 1-hour $O_3$ standard within the planning horizon (SCAQMD 2017).

The future air quality levels projected in the 2016 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by SCAG in the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 7, 2016. The 2016 AQMP also assumes that general development projects will include strategies in the form of project design features and practices and other mitigation measures to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations which are designed to address air quality impacts and pollution control measures. This 2016 AQMP identifies the control measures that would be implemented to reduce major sources of pollutants. These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

SCAQMD is currently developing the 2022 AQMP to address the 2015 updated NAAQS for ground-level $O_3$, for which the Basin is designated extreme nonattainment.

*SCAQMD Rule Book*

The SCAQMD has adopted the SCAQMD Rule Book, which establishes a set of rules and regulations that address air pollution sources. Some SCAQMD rules are administrative in nature, but many relate to a specific type of operation or source of pollution. Each regulation is broken down into rules, each of which governs a specific topic within that regulation. SCAQMD rules that may apply to the proposed Project include:

- **Rule 402 Nuisance** – This rule prohibits discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 Fugitive Dust** – The purpose of this rule is to reduce the amount of particulate matter (e.g., $PM_{10}$) entrained in the ambient air as a result of anthropogenic (i.e., man-made) fugitive dust sources, such as grading and excavation, by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- **Rule 1113 Architectural Coatings** – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories. For example, exterior paints and finishes are limited to a VOC emissions rate of 50 grams per liter (g/L).
- **Rule 1138 Control of Emissions from Restaurant Operations** – This rule specifies emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat (e.g., for the kitchen facilities in the proposed RCFE Building and the Blue Zones café).
- **Rule 1146.2 Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters** – This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce $NO_x$ emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- **Rule 1186 $PM_{10}$ Emissions from Paved and Unpaved Roads** – This rule applies to owners and owners of paved and unpaved roads. The rule is intended to reduce $PM_{10}$ emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads.

In addition to developing air pollution regulations, the SCAQMD is under a legal obligation to enforce these regulations. The SCAQMD also has broad authority to regulate toxic and hazardous

air emissions, and these regulations are enforced in the same manner as those which pertain to the ambient air quality standards. The SCAQMD has devised a broad compliance program to provide for enforcement activities.

*SCAQMD CEQA Air Quality Handbook*

In 1993, the SCAQMD prepared the SCAQMD CEQA Air Quality Handbook (1993) to assist local government agencies and consultants in preparing environmental documents for projects subject to CEQA. The CEQA Air Quality Handbook describes the criteria that SCAQMD uses when reviewing and commenting on the adequacy of environmental documents. Other important subjects covered in the CEQA Air Quality Handbook include methodologies for estimating project emissions and mitigation measures that can be implemented to avoid or reduce air quality impacts. Although the Governing Board of the SCAQMD has adopted the CEQA Air Quality Handbook, the SCAQMD does not supersede a local jurisdiction's CEQA procedures.

The SCAQMD is in the process of developing the Air Quality Analysis Guidance Handbook (Guidance Handbook) to replace the CEQA Air Quality Handbook. While the Guidance Handbook is still being developed, the SCAQMD has adopted supplemental guidance for conducting an air quality analysis. This guidance includes revisions to the air quality significance thresholds and a procedure referred to as *"localized significance thresholds,"* which has been added as a significance threshold under the Final Localized Significance Threshold (LST) Methodology. LSTs are developed based on the ambient concentrations of that pollutant for each SRA. The LST methodology provides thresholds of significance for $NO_x$, CO, $PM_{10}$, and $PM_{2.5}$ to evaluate localized air quality impacts at sensitive receptors in the vicinity of a project, in lieu of conducting dispersion modeling. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways.

*Southern California Association of Governments*

SCAG is the Metropolitan Planning Organization for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. Although SCAG is not an air quality management agency, it addresses regional issues relating to transportation, the economy, community development, and the environment resources and constraints. As part of regional planning, SCAG is responsible for developing transportation, land use, and energy conservation measures that affect air quality.

SCAG has adopted strategies and plans to implement California's Sustainable Communities and Climate Protection Act (Senate Bill [SB] 375). On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS (Connect SoCal). Connect SoCal is supported by a combination

of transportation and land use strategies that help the region achieve State GHG emission reduction goals and Federal CAA requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and utilize resources more efficiently. See Section 3.7, *Greenhouse Gas Emissions and Climate Change,* for a discussion of the RTP/SCS and GHG emissions.

City of Redondo Beach Local Regulations

As a local jurisdiction, the City of Redondo Beach has the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City of Redondo Beach is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. Redondo Beach is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include development of bus turnouts to reduce traffic congestion, energy-efficient streetlights, and synchronized traffic signals. Redondo Beach assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

*Redondo Beach General Plan Land Use Element*

The Redondo Beach General Plan Land Use Element includes the following policies that directly relate to reducing air quality impacts:

Policy 1.9.1 Control the development of industrial and other uses which use, store, produce, or transport toxics, generate unacceptable levels of noise, air emissions, or contribute other pollutants; requiring adequate mitigation measures confirmed by environmental review (I1.1, I1.8).

Policy 1.60.4 Establish local procedures, requirements, and programs as to maintain local and regional environmental quality and mitigate impacts; including, but not limited to, air quality management, traffic congestion management, jobs-housing balance, hazardous waste management, water and energy conservation, water quality control, noise abatement, and coastal protection (I1.1, I1.2, I1.3, I1.8).

Policy 1.57.3 Require that the elevation of all parking structures facing residential parcels be enclosed or controlled to prevent adverse

noise and air emission impacts on the residences and incorporate architectural design elements, such as surface treatments, off-set planes, and structural articulation and landscape, to provide visual interest and be compatible with the residences (I1.1, I1.7, I1.18).

*Redondo Beach General Plan Transportation and Circulation Element*

Goal 12: Encourage all employers to pursue successful TDM measures demonstrated in South California.

Goal 14: Increase the provision of bike lockers, bike racks, and lighting for bike facilities.

Many other goals and individual policies, as set forth in Section 3.14, *Transportation* and Section 3.7, *Greenhouse Gas Emissions and Climate Change*, also have the practical effect of reducing air pollution by reducing vehicle miles traveled (VMT), and fossil fuel, water, and energy consumption.

City of Torrance Local Policies and Regulations

The Torrance General Plan (2010) includes multiple chapters that identify goals and policies designed to help improve air quality in the City. Trip reduction strategies are addressed in the land use and circulation elements. The land use element also includes policies to encourage walkability through site design. The circulation element includes policies to encourage the use of alternative forms of transportation and implementation strategies for employers, developers, and merchants. Transportation Demand Management (TDM) strategies include promoting the use of carpools, vanpools, work-related transit use, bicycling, and walking as a means to improve air quality and to minimize congestion on the local and regional network (City of Torrance 2010).

*Torrance General Plan Community Resources Element*

Objective CR.13. To contribute to the improvement of local and regional ambient air quality to benefit the health of all.

Policy CR.13.1 Continue to participate in the efforts of the CARB and the SCAQMD to meet State and Federal air quality standards.

Policy CR.13.2 Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality.

Policy CR.13.3 Support regional air quality goals through conscientious land use and transportation planning and the implementation of resource conservation measures.

Policy CR.13.4 Balance the achievement of clean air with other major goals of the City.

Policy CR.13.5 Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.

Policy CR.13.6 Promote citizen awareness and participation in programs to reduce air pollution and traffic congestion.

Policy CR.13.7 Encourage the use of alternative fuel vehicles and re-refined oil.

Policy CR.13.8 Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.

Many air quality strategies result in co-benefits by reducing GHG emissions and vice versa (See Section 3.7, *Greenhouse Gas Emissions and Climate Change* for a discussion of GHG emissions reduction policies).

*Torrance Trip Reduction and Traffic Management Ordinance*

In order to reduce mobile source emissions, the City has adopted a Trip Reduction and Traffic Management Ordinance (Municipal Code Division 9 Chapter 10) to incentivize walking, cycling, use of public transit, and carpooling to work.

### 3.2.3 Impact Assessment Methodology

#### 3.2.3.1 Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on air quality if it would do any of the following:

a) Conflict with or obstruct implementation of the applicable air quality plan;

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard;

c) Expose sensitive receptors to substantial pollutant concentrations; and/or

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

In determining whether an effect is significant, CEQA Guidelines Section 15064.7 states that a Lead Agency may consider thresholds of significance previously adopted or recommended by other public agencies, provided that the decision to use such thresholds is supported by substantial evidence. Further, with regard to air quality, CEQA Guidelines Section 15064.7 reads:

> *"Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make ... determinations."*

In a February 2018 CEQA Guidance document released by SCAQMD (SCAQMD 2018), the SCAQMD states that:

> *"Air districts' thresholds provide a clear quantitative benchmark to determine the significance of project and project alternative air quality impacts. They also help identify the magnitude of the impacts, facilitate the identification of feasible mitigation measures, and evaluate the level of impacts before and after mitigation measures. Since one of the basic purposes of CEQA is to inform government decision makers and the public about the potential significant environmental effects of any proposed activities (CEQA Guidelines Section 15002[a][1]), use of air district thresholds is a best practice for CEQA impact determinations."*

The SCAQMD, the air pollution control agency in the Basin, has developed specific regional and local significance thresholds for air quality, and recommends that projects in the Basin be evaluated in terms of these thresholds. These SCAQMD thresholds do not supersede the significance thresholds established in Appendix G of the 2020 CEQA Guidelines described above; these SCAQMD thresholds are used to implement the CEQA thresholds with specific criteria to assess whether air pollution effects of proposed projects are significant. The impacts assessment of this EIR addresses the thresholds from Appendix G of the CEQA Guidelines through the application of SCAQMD thresholds which are specific to conditions in the Basin. The following thresholds are currently recommended by the SCAQMD and have been used to determine the significance of air quality impacts associated with the proposed Project.

Conflict with Air Quality Plan

The threshold used for determining whether the proposed Project would conflict with or obstruct an applicable air quality plan is qualitative and is based on whether the proposed Project is consistent with the assumed growth, applicable control measures and air emission reduction policies in the AQMP. Therefore, the proposed Project would have a significant impact if it would:

- Conflict with or obstruct implementation of the AQMP or any other adopted regional and local plans adopted for reducing air quality impacts.

Cumulatively Considerable Net Increase in Criteria Pollutants

*Construction Emissions Thresholds*

The SCAQMD recommends that projects with construction-related emissions that exceed any of the following regional (mass daily) emissions thresholds should be considered significant.

- 550 pounds per day of CO
- 100 pounds per day of $NO_x$
- 150 pounds per day of $SO_x$
- 75 pounds per day of VOC
- 150 pounds per day of $PM_{10}$
- 55 pounds per day of $PM_{2.5}$
- 3 pounds per day of Pb

*Operational Emissions Thresholds*

The SCAQMD's thresholds recommend that projects with operational emissions that exceed any of the following regional (mass daily) emissions should be considered potentially significant.

- 550 pounds per day of CO
- 55 pounds per day of $NO_x$
- 150 pounds per day of $SO_x$
- 55 pounds per day of VOC
- 150 pounds per day of $PM_{10}$
- 55 pounds per day of $PM_{2.5}$
- 3 pounds per day of Pb

*Localized Significance Thresholds*

As previously described, LSTs were developed for construction phases in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative (I-4). The Final LST Methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds. If receptors are within 25 meters (82 feet) of the Project site (i.e., extent of construction activities), the methodology document says that the threshold for the 25-meter distance should be used.

The Project site is located in SRA 3. The nearest sensitive receptors are located on the BCHD campus and the nearest off-site sensitive receptors are located within 26 meters, including the residential uses located directly across Flagler Lane and Flagler Alley to the east of the Project site (refer to Table 3.2-4). The Project site is a 9.78-acres in size; however, this analysis uses LSTs for a 1-acre site to provide a conservative analysis (because a smaller site provides less buffering distance between construction activities and nearby sensitive receptors), given that construction activities would be distributed over a larger area, resulting in more disperse emissions. The LSTs for a 1-acre site within 25 meters of sensitive receptors in SRA 3 are:

- 664 pounds per day for CO
- 91 pounds per day for $NO_2$
- 5 pounds per day for $PM_{10}$
- 3 pounds per day for $PM_{2.5}$

CO and $NO_2$ LST thresholds apply to both residential and off-site worker receptors (i.e., people who work in businesses off-site). $PM_{10}$ and $PM_{2.5}$ LST thresholds are relevant to sensitive receptors that are reasonably likely to be present for 24 hours or longer. Since off-site worker receptors are not expected to be present for this duration, $PM_{10}$ and $PM_{2.5}$ LST thresholds do not apply to off-site worker receptors.

<u>Impacts to Sensitive Receptors</u>

*Toxic Air Contaminants*

CARB indicates that one of the highest public health priorities is the reduction of DPM generated by vehicles on California's freeways and highways, because it is one of the primary TACs. CARB's Air Quality and Land Use Handbook: A Community Health Perspective (2005) makes specific recommendations with respect to considering existing sensitive uses when siting new

TAC-emitting facilities or with respect to TAC-emitting sources when siting sensitive receptors. CARB recommends the following buffer distances be observed when locating these types of TAC emitters or sensitive land uses:

- Freeways or major roadways – 500 feet
- Dry cleaners – 500 feet
- Auto body repair services – 500 feet
- Gasoline dispensing stations with an annual throughput of less than 3.6 million gallons – 50 feet
- Gasoline dispensing stations with an annual throughput at or above 3.6 million gallons – 300 feet

The proposed Project does not place sensitive land uses within the above buffer zones. The nearest major arterial is the Pacific Coast Highway, located approximately 0.5 miles (2,640 feet) from the Project site. Other roadways in the immediate vicinity of the Project site (e.g., North Prospect Avenue and Beryl Street) do not carry sufficient volumes of traffic to be considered as potential TAC generators. Other potential TAC generators within the vicinity of the Project site are associated with specific types of facilities, such as gas stations, dry cleaners, and auto body repair shops, and are the focus of local control efforts. The existing Shell gas station at the southeast corner of North Prospect Avenue and Beryl Street is located approximately 330 feet from the Project site and approximately 485 feet from the proposed Residential Care for the Elderly (RCFE) Building, which would be constructed as a part of the Phase 1 preliminary site development plan.

The SCAQMD recommends that site-specific HRAs be performed to document potential cancer and non-cancer health risk, either when siting sensitive land uses within the above buffer zones or when a project could generate TACs that may impact surrounding sensitive receptors (e.g., residences). Based on the methodology established by the OEHHA, the SCAQMD established the following thresholds for maximum individual cancer risk (MICR)[2] and non-cancer acute and chronic hazard index (HI)[3] to assess a project's construction-related health impacts on sensitive receptors:

- MICR – cancer risk of less than 10 in one million ($<10 \times 10^{-6}$)

[2] MICR is the maximum estimated risk of contracting cancer when continually exposed for a lifetime (70 years) to a given concentration of a substance. This does not necessarily mean anyone will contract cancer as a result of the project.
[3] The potential non-cancer health impacts resulting from a 1-hour exposure to toxic substances. An acute (i.e., generally developing suddenly and lasting a short time) hazard index is calculated by dividing the 1-hour concentration of a toxic pollutant by the acute reference exposure level for that pollutant. A chronic (i.e., conditions develop slowly and may worsen over an extended period of time) hazard index is calculated by dividing the annual average concentration of a toxic pollutant by the chronic reference exposure level for that pollutant.

- HI – highest chronic health index of less than 1

Construction emissions from diesel-fueled heavy construction equipment could cause TAC exposure for surrounding sensitive receptors, as further described below in Section 3.2.3.2, *Methodology*; therefore, a construction HRA has been prepared to assess health risks associated with the proposed Project, including both the Phase 1 preliminary site development plan and the more general Phase 2 development program.

*CO Hotspots*

With respect to the formation of CO hotspots, a project's localized air quality impact is considered significant if CO emissions create a hotspot where either the State 1-hour standard of 20 ppm or the Federal and State 8-hour standard of 9.0 ppm is exceeded. In general, this only occurs at severely congested intersections (i.e., LOS E or worse).

To reflect current conditions at the Project site and the stable trend in declining CO concentration levels in the Basin, SCAQMD's CO hotspot screening criteria have been used to describe potential CO hotspots within Redondo Beach and Torrance. A detailed CO analysis was conducted in the Federal Attainment Plan for Carbon Monoxide (CO Plan for the SCAQMD's 2003 Air Quality Management Plan). The locations selected for microscale modeling in this analysis were worst-case intersections in the Basin that would likely experience the highest CO concentrations. As such, SCAQMD modeled the four most congested intersections in the Basin: 1) Wilshire Boulevard & Veteran Avenue; 2) Sunset Boulevard & Highland Avenue; 3) La Cienega Boulevard & Century Boulevard; and 4) Long Beach Boulevard & Imperial Highway. In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard & Veteran Avenue is the most congested intersection in Los Angeles County, with an ADT of approximately 100,000 vehicles per day (SCAQMD 2003a). This intersection is located near the on- and off-ramps to I-405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (maximum 1-hour concentration) and 3.2 (maximum 8-hour concentration) at Wilshire Boulevard & Veteran Avenue (exclusive of ambient background CO concentrations), which is well below the Federal and State CO standards. This indicates that intersections operating with less than 100,000 vehicles per day would not create a CO hot spot.

### 3.2.3.2 Methodology

Conflict with Applicable Air Quality Plan

Federal and State ambient air quality standards are designed to prevent the harmful effects of air pollutant emissions. These standards are continually updated based on evolving research, including research which relates air quality impacts with health effects. At the regional level, plans such as the SCAQMD's AQMP and SCAG's RTP/SCS work to ensure that the Basin reaches and maintains attainment with these Federal and State standards. Locally, EIRs evaluate a plan or project's consistency with applicable policies identified in the SCAQMD's AQMP and SCAG's RTP/SCS intended to protect human health.

SCAQMD is required, pursuant to the Federal CAA, to reduce emissions of criteria pollutants for which the Basin is in nonattainment of the NAAQS. The assessment of consistency with the AQMP focuses on the potential for construction and operation of the proposed Project to create or contribute to air quality violations and possibly delay air quality standards attainment. The SCAQMD's AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving attainment with the NAAQS and CAAQS. The SCAQMD significance thresholds are health-protective and also serve to achieve attainment with the NAAQS and CAAQS within the Basin. Thus, projects, uses, and activities that generate emissions below SCAQMD's significance thresholds for criteria pollutants would thereby not conflict with or obstruct implementation of the AQMP.

Cumulatively Considerable Net Increase in Criteria Pollutants

CEQA Guidelines Section 15130 requires that an EIR discuss cumulative impacts of a project when the project's incremental effects are cumulatively considerable. A *"cumulative impact"* is an impact that is created as a result of the combination of the proposed project together with other projects causing related impacts. *"Cumulatively considerable"* means that the incremental effects of the individual project are significant when viewed in connection with the effects of past projects, current projects, and probable future projects.

The SCAQMD guidance on addressing cumulative impacts for air quality is as follows: *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR... Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds*

*are generally not considered to be cumulatively significant"* (SCAQMD 2003b). This policy is appropriate when addressing air quality impacts because project-specific criteria pollutant emissions are already evaluated in the SCAQMD's AQMP on a cumulative basis in the context of emissions occurring Basin-wide.

This analysis focuses on the air quality impacts that could occur from air pollutant emissions associated with the construction and operation of the proposed Project, including impacts from Project-related traffic volumes. Consistent with SCAQMD guidance, this analysis evaluates the contribution of the proposed Project to cumulative air quality impacts by comparing the estimated construction and operational emissions against the SCAQMD's thresholds of significance defined above, as described further below. Project-related construction and operational emissions were estimated using CalEEMod Version 2016.3.2 developed for SCAQMD. Calculation details are provided in the CalEEMod worksheet results in Appendix B.

*Construction Emissions*

Construction emissions were estimated using CalEEMod, which assesses emissions from each phase of construction, including demolition, excavation and site preparation, building construction, and architectural coating. CalEEMod was used to quantify emissions from construction equipment exhaust, construction vehicles, fugitive dust, and architectural coatings. Construction schedule, equipment utilization, the amount of demolition debris and excavated soil to be removed from the Project site, and the number of vehicle trips generated by construction workers and other construction vehicles (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*) were primarily developed by the construction management firm CBRE and manually included in the CalEEMod modeling. In cases where information was not provided by CBRE (e.g., trip length data for construction hauling), CalEEMod defaults were used.

Heavy construction equipment could include diesel-powered graders, excavators, dump trucks, cranes, and bulldozers. As a result, construction activities under the Phase 1 preliminary site development plan as well as the more general Phase 2 development program would temporarily increase diesel emissions from equipment and vehicle exhaust and would generate particulate matter in the form of fugitive dust. Compliance with SCAQMD rules and regulations that would be required during construction (e.g., SCAQMD Fugitive Dust Rule, etc.) were not included in CalEEMod to reflect a conservative analysis of the potential construction emissions. The precise construction timeline for the proposed Project depends on the timing of entitlements and permit

processing. The construction activities associated with the proposed Project and estimated durations are as follows (see Appendix B for the construction schedule used in the CalEEMod):

Phase 1 construction activity would begin in February 2022 and last for approximately 29 months with overlapping construction phases.

- Shoring, Excavation, and Utility Work – 2 months
- Construction of the RCFE Building – 24 months
- Demolition of the Beach Cities Health Center – 1 month

The development program under Phase 2 is expected to begin approximately 5 years after the completion of Phase 2 and would last for approximately 28 months. As with Phase 1, it is expected the duration of construction activities during Phase 2 would involve overlapping construction phases, including:

- Demolition of the Above Ground Parking Structure and Beach Cities Advanced Imaging Building – 3 months
- Excavation, Grading, and Utility Work – 1 month
- Construction of the New Medical Office Building – 6 months
- Construction of the Aquatics Center and Center for Health and Fitness (CHF) – 7 months
- Construction of the Wellness Pavilion – 6 months
- Construction of the Parking Garage – 12 months

CalEEMod calculates the peak day construction emissions by calculating emissions from overlapping construction activities. Peak daily construction emissions represent the potential worst-case maximum daily emissions of a construction day, and do not represent the emissions that would typically occur during every day of construction associated with the proposed Project. The estimated maximum daily construction emissions are then compared to the SCAQMD daily significance thresholds to identify any exceedances of thresholds, which could result in a significant impact.

*Operational Emissions*

Operational emissions associated with the proposed Project are estimated using CalEEMod for area, energy , and mobile source emissions. Operational air quality impacts are assessed by subtracting the baseline emissions from the total Project emissions and comparing the resulting increment (i.e., net increase or decrease in emissions) to the SCAQMD's numerical thresholds. Under CEQA, the baseline environmental setting for an EIR is established at or around the time that the Notice of Preparation (NOP) for the EIR is published. As discussed previously, the Project

site is currently occupied by the Beach Cities Health Center, outpatient medical office buildings, a maintenance building, and associated parking areas.

Area source emissions would be generated by consumer products, architectural coating, and landscape maintenance equipment. Energy source emissions are generated by emissions resulting from electricity and natural gas consumption for space and water heating. Mobile emissions that would result from vehicle trips to and from the BCHD campus were calculated based on the Intersection Operational Evaluation and other default traffic assumptions embedded in CalEEMod (see Appendix B). To determine if an air quality impact would occur, the incremental (i.e., net new) daily emissions from operation of the proposed BCHD Healthy Living Campus were compared with SCAQMD's regional (mass daily) thresholds.

*Localized Significance Thresholds for Construction*

The potential for construction emissions associated with the proposed Project to cause localized impacts for certain criteria pollutants was calculated using SCAQMD's LST Methodology (SCAQMD 2008). According to the SCAQMD LST Methodology, the assessment of localized impacts addresses only those emissions that are generated *"on-site,"* that is for the purposes of the proposed Project, emissions generated from within or along the boundaries of the Project site. Therefore, for this localized analysis, only the on-site emissions reported for each construction phase in the CalEEMod worksheets are examined.

<u>Impacts to Sensitive Receptors</u>

*Health Effects from Criteria Air Pollutant Emissions*

In December 2018, the California Supreme Court held that the EIR for the Friant Ranch Project – a 942-acre master-planned, mixed-use development with over 2,500 senior residential units, 250,000 square feet (sf) of commercial space, and extensive open space/recreational amenities on former agricultural land in north central Fresno County – was deficient in its informational discussion of air quality impacts as they relate to adverse human health effects.

As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (April 6, 2015, Attachment A), SCAQMD concluded that currently available regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations associated with individual projects. Regional modeling tools are generally designed to be used at the national, State, regional, and/or city levels and are not well equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project directly impact human health in a particular area. Even where a HRA can be prepared, however, the resulting maximum health risk value is

only a calculation of risk – it does not necessarily mean anyone will contract cancer or non-cancer health risks as a result of the project.

For local plans or projects that exceed any identified SCAQMD air quality threshold, EIRs typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or an individual project and a particular health effect. In addition, no relevant agency has approved a quantitative method to reliably and meaningfully do so. A number of factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature of the relationship between air pollutants and health effects in conjunction with local environmental variables. Therefore, at the time, it is infeasible for this EIR to directly link a plan's or project's significant air quality impacts with a specific health effect.

*Toxic Air Contaminants*

The greatest potential for TAC impacts during construction activities under the Phase 1 preliminary site development plan and the more general Phase 2 development program would be related to DPM emissions associated with heavy-duty construction equipment during demolition, excavation, and grading activities. Construction activities associated with the proposed Project would be sporadic, transitory, and short-term in nature. Nevertheless, while the proposed construction activities would be temporary, construction impacts associated with TACs have been addressed quantitatively in a construction HRA prepared by iLanco Environmental, LLC (iLanco) (see Appendix B).

The HRA prepared for the proposed Project quantifies the potential cancer risks and non-cancer chronic health impacts to sensitive receptors that may be affected by exposure to TACs from proposed construction activities. Operational sources of TACs associated with the proposed Project would be limited to vehicle trips to and from the Project site. Given that the proposed Project would result in a minor increase of 376 daily vehicle trips relative to existing conditions and a decrease in AM and PM peak hour trips (see Section 3.14, *Transportation*), health risk associated with operational emissions would also be similar to existing conditions. Since health risks from operations would remain similar to baseline existing conditions, operational impacts related to TACs were not quantified in the HRA.

Sensitive receptors include residences, schools, childcare, and convalescent facilities. The closest and most impacted sensitive receptors would be off-site residences surrounding the Project site (refer to Table 3.2-4). The on-site Beach Cities Child Care Development Center and on-site

residents at the existing Silverado Beach Cities Memory Care Community and the proposed RCFE Assisted Living and Memory Care facilities were also evaluated. Students at the Towers and Beryl Elementary schools were considered, but since these receptors are located much further away from the Project site, they would experience impacts much lower than nearby residential and on-site receptors. Consequently, while air dispersion modeling was conducted for these receptors, health impacts at these receptors were inferred to be lower than the PMI, MEIR, and on-site receptors and therefore, were not quantified.

The construction HRA was conducted by: 1) calculating TAC emissions; 2) determining maximum TAC concentrations at sensitive receptors via air dispersion modeling; 3) quantifying health risks associated with those maximum concentrations; and 4) comparing those health risks to SCAQMD's thresholds of significance. The HRA was conducted in accordance with the SCAQMD dispersion modeling guidance (SCAQMD 2020) and the OEHHA Guidance (OEHHA 2015). CalEEMod was used to quantify emissions from anticipated construction activities. The USEPA's AERMOD dispersion model was used for dispersion modeling (USEPA 2019b). CARB's Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool was used to calculate cancer risk and non-cancer health impacts.

The USEPA's AERMOD dispersion model is the accepted method to address the movement of air pollutants and considers various parameters, including configuration of the construction equipment, terrain elevation, meteorological conditions (i.e., localized wind patterns), and the location of sensitive receptors in relation to the site.

HARP is the accepted model used to calculate cancer risk and non-cancerous chronic health impacts. HARP's Risk Assessment Standalone Tool module was used in this analysis to evaluate cancer risk and non-cancer chronic effects associated with the receptors noted above. HARP's default residential exposure duration for cancer risk assumes that residents live in their homes and are exposed to pollutant emissions for 30 years. However, because the proposed Project would be constructed over a 6-year period (i.e., 2022, 2023, 2024, 2029, 2030, and 2031), the exposure duration for this assessment was 6 years (i.e., 3 years for Phase 1 and 3 years for Phase 2). Additionally, since emissions would vary in magnitude and location for each phase of construction, risk estimates were calculated individually for the Phase 1 preliminary site development plan and the Phase 2 development program. The total cancer risk at each receptor was then determined by adding Phase 1 and Phase 2 cancer risks. Non-cancer chronic impacts reflect the maximum calculated value among the 6 construction years.

For the purposes of assessing TACs during construction, the construction HRA quantifies cancer risk and non-cancer chronic health effects at the point of maximum impact (PMI) and for the

maximum exposed individual resident (MEIR). The PMI is the location where the cancer risk or non-cancer chronic health effect is maximum, regardless of the presence of a human receptor at that location. No concentration higher than the PMI would occur from the proposed construction activities. The MEIR is the location with the highest cancer risk or non-cancer chronic health effect where a person can be reasonably present. The dispersion modeling was conducted to estimate ground-level DPM concentrations for the PMI, MEIR, Towers Elementary School, Beryl Heights Elementary School, and residents living at the Silverado Beach Cities Memory Care Community and at the proposed RCFE Building that would be constructed during Phase 1 of the proposed Project (see Appendix B).

Health risk calculations were performed using the OEHHA methodologies and exposure parameters, and the corresponding SCAQMD guidance documents. In March 2015, OEHHA updated the methods for estimating cancer risks to use higher estimates of cancer potency during early life exposures and to use different assumptions for breathing rates and length of residential exposures. The Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments, incorporates advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (OEHHA 2015). These updated exposure factors can result in numeric life-time health risk values to be approximately two to three times higher than those calculated under the previous OEHHA guidelines.

Project construction activities would require the use of off-road construction equipment and on-road vehicles. These equipment and vehicles would primarily burn diesel fuel, resulting in combustion exhaust emissions. The primary TAC of concern associated with combustion of diesel fuel is DPM. OEHHA guidance indicates that particulate matter of 10 microns in diameter or smaller ($PM_{10}$) be used as a surrogate for the TAC DPM when evaluating health risks associated with DPM (OEHHA 2015).

Diesel exhaust is the dominant type of TAC emission associated with construction of the proposed Project and diesel emissions would be emitted in closest proximity to receptors.

Detailed methodologies and assumptions utilized in the HRA are described further in Appendix B.

*CO Hotspots*

Localized air quality impacts and respiratory health risks could occur as a result of CO hotspots. Areas with high vehicle volumes, such as congested intersections (i.e., LOS E or worse), have the potential to create high concentrations of CO, known as CO hot spots. This analysis considers the potential generation of 376 net new vehicle trips per day following buildout under the Phase 2

development program (see Section 3.14, *Transportation*) and its contribution to the most congested intersections affected by the proposed Project.

### 3.2.4 Project Impacts and Mitigation Measures

Impact Description (AQ-1)

*a) Conflict with or obstruct implementation of the applicable air quality plan.*

**AQ-1** **Construction and operation of the proposed Beach Cities Health District (BCHD) Healthy Living Campus – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate emissions that would contribute to Basin-wide air pollutant emissions. Because the proposed Project would not cause or increase the severity of air quality violations and mitigated emissions would not exceed the South Coast Air Quality Management District's (SCAQMD's) significance thresholds, the proposed Project would not conflict with the Air Quality Management Plan (AQMP). Impacts would be *less than significant with mitigation.***

Generally, a project would conflict with or potentially obstruct implementation of an air quality plan if the project would create or contribute to air quality violations within the Basin. Air quality violations occur when facilities are out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable Federal or State air pollution regulations. The regional and localized air quality significance thresholds were designed as a screening tool to avoid the potential occurrence and exacerbation of air quality violations resulting from construction and operation of individual projects based on the designation of emissions sources warranting advanced permitting and regulation.

As described in Impact AQ-2 below, peak daily criteria pollutant emissions from construction of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for construction. Unmitigated localized construction emissions from the proposed Project would exceed SCAQMD's LSTs for $PM_{10}$ and $PM_{2.5}$ (fugitive dust). However, implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 mph, which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD's LSTs.

As described in Impact AQ-3 below, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for

operation. Further, localized operational emissions from operation of the proposed Project, including the Phase 1 preliminary site development plan and the Phase 2 development program, would not exceed the SCAQMD's LSTs.

The proposed Project would not result in, cause, or contribute to air quality violations within the Basin. With implementation of MM AQ-1, localized construction emissions from the proposed Project would not exceed SCAQMD's LSTs. Therefore, the proposed Project would not conflict with the SCAQMD's 2016 AQMP, and impacts would be *less than significant with mitigation* for the Phase 1 preliminary site development plan and the Phase 2 development program.

Impact Description (AQ-2)

b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard.*

**AQ-2** **Construction activities associated with the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate air pollutant emissions; however, emissions of CO, $NO_x$, $SO_x$, $PM_{10}$, $PM_{2.5}$, and VOC, would not exceed South Coast Air Quality Management District's (SCAQMD's) regional significance thresholds for construction. On-site construction-related emissions would exceed the Localized Significant Thresholds (LSTs) for $PM_{10}$ and $PM_{2.5}$. Therefore, the Project could expose sensitive receptors to substantial pollutant concentrations. However, this impact would be *less than significant with mitigation.***

As described in Section 3.2.3.2, *Methodology*, projects with impacts below the SCAQMD thresholds are not considered to contribute considerably to cumulative impacts. The following impact analysis considers peak daily and localized construction emissions generated from construction of the proposed Project, including the Phase 1 preliminary site development plan and the Phase 2 development program. These peak daily and localized construction emissions are evaluated against the SCAQMD's mass daily significance thresholds and LSTs, respectively, to determine whether construction of the proposed Project would contribute to a cumulatively considerable net increase of criteria pollutants.

*Peak Daily Construction Emissions*

During construction of Phase 1 and Phase 2, construction-related pollutant emissions such as $PM_{10}$, $PM_{2.5}$, $NO_x$, SOx, CO, and VOC would be generated by exhaust from heavy-duty on-site construction equipment, haul trucks, and construction worker vehicles. The majority of fugitive dust emissions (i.e., $PM_{10}$ and $PM_{2.5}$) would result during demolition and excavation activities. During the architectural finishing phase, the application of architectural coatings (i.e., paints) and other building materials would also release VOC emissions. The assessment of construction air quality impacts provided in detail below quantifies each of these potential sources.

Haul truck trips, concrete truck trips, and materials delivery truck trips are described in detail in Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*. These truck trips in and out of the Project site would exit the Interstate (I-) 405 freeway on 190th Street or Hawthorne Avenue to 190th Street and reach the site using Del Amo Street to North Prospect Avenue (refer to Figure 2-13). Haul trucks would idle on-site while waiting to export excavation and debris from demolition. However, these trucks would be prohibited from idling for longer than 5 minutes pursuant to California Idling Regulations as defined by CARB, which prohibits heavy-duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or more from idling for longer than 5 minutes. Compliance with this regulation would result in minor, intermittent sources of air emissions. Additionally, roadways along the inbound and outbound haul routes carry substantial volumes of traffic, which currently generates mobile source emissions. As such, the haul truck trips associated with the Phase 1 preliminary site development plan and Phase 2 development program would not substantially increase mobile source emissions above existing conditions along these routes.

SCAQMD Rule 403 requires management of all fugitive dust ($PM_{10}$) generated during construction activities. All haul trucks would be required to be covered to contain dirt, sand, soil, or other loose materials during transport. Wheel washers would be installed where vehicles enter and exit the Project site onto paved roads, and/or wash-off trucks would be required for any equipment leaving the site before each trip to prevent tracking of construction dust/dirt off-site. All construction activities associated with the proposed Project would be required to control dust, including application of water at least two times daily, or by application of non-toxic soil stabilizers to all unpaved parking or staging areas or unpaved road surfaces, as well as application of non-toxic soil stabilizers to all inactive construction areas. The proposed Project would also be required to comply with SCAQMD Rule 1186, which requires the use of certified street sweepers or roadway washing trucks if visible soil materials are carried onto adjacent streets. Compliance with these SCAQMD requirements would ensure that fugitive dust emissions would be reduced during

the demolition, excavation, and building construction phases of the Project. Although these fugitive dust measures would be required by SCAQMD to reduce fugitive dust emissions, these were conservatively excluded from the CalEEMod for the proposed Project, and are not reflected in Table 3.2-5.

**Table 3.2-5. Unmitigated Maximum Estimated Construction Emissions Compared to SCAQMD Thresholds (lbs/day)**

| Emission Source | CO | VOC | $NO_x$ | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| ***Phase 1*** | | | | | | |
| Construction (2022) | 30 | 4 | **61** | 0 | 16 | **4** |
| Construction (2023) | 38 | 12 | 26 | 0 | 4 | 2 |
| Construction (2024) | 25 | 9 | 41 | 0 | **17** | **4** |
| ***Phase 2*** | | | | | | |
| Construction (2029) | 34 | 4 | 34 | 0 | 6 | 2 |
| Construction (2030) | 54 | 20 | 34 | 0 | 11 | 3 |
| Construction (2031) | **55** | **27** | 34 | 0 | 11 | 3 |
| Peak Daily Total | **55** | **27** | **61** | **0** | **17** | **4** |
| ***SCAQMD Thresholds of Significance*** | *550* | *75* | *100* | *150* | *150* | *55* |
| Above Thresholds? | **No** | **No** | **No** | **No** | **No** | **No** |

Notes: Refer to Appendix B for CalEEMod output sheets. **Bold** text indicates the highest potential daily emission level over the two construction phases.
Source: SCAQMD 2019b.

A portion of the VOC emissions associated with the Phase 1 and the Phase 2 would be generated from the application of architectural coatings, including paints, stains, and other finishes that off-gas VOCs during the drying/curing process. However, in compliance with the SCAQMD Rule 1113, the proposed Project would use No VOC or Low VOC finishes (i.e., VOC emission ratings <50 g/L). Use of No VOC or Low VOC finishes would ensure that VOC emissions during the architectural coating phase of construction would be minimized. Although the use of No VOC or Low VOC finishes would be required by SCAQMD Rule 1113, this measure was conservatively excluded from the CalEEMod, and is not reflected in the VOC emissions presented in Table 3.2-5 above.

Maximum daily criteria pollutant emissions for individual and overlapping construction activities were estimated using CalEEMod for each stage of construction, including demolition, grading/excavation, building construction, and architectural coating for both the Phase 1 preliminary site development plan and the Phase 2 development program. As shown in Table 3.2-5, maximum daily construction emissions would not exceed SCAQMD thresholds for CO, VOC, $NO_x$, $SO_x$, $PM_{10}$, or $PM_{2.5}$ for the proposed Project. Therefore, impacts relating to temporary, short-

term emissions of construction-related air pollutants would be *less than significant* for the Phase 1 preliminary site development plan and the Phase 2 development program .

*Localized Construction Emissions*

Sensitive receptors, including the Silverado Beach Cities Memory Care Community, Beach Cities Child Development Center, and outpatient medical offices (refer to Table 3.2-4), are currently located on the BCHD campus and would remain on-site during the construction activities associated with Phase 1. Additional off-site sensitive receptors include the single-family residences located approximately 80 (26 meters) feet to the east in West Torrance, multi-family residences located approximately 80 feet (26 meters) to the north along Beryl Street, and Dominguez Park located approximately 110 feet (34 meters) to the northeast of the Project site. Nearby residents as well as those using the recreational facilities located near the Project site, particularly the elderly and children, could experience adverse health effects from CO, $NO_x$, $PM_{10}$, or $PM_{2.5}$, if concentrations of these criteria pollutants exceed the applicable LSTs. For example, fugitive dust would be generated during construction activities due to grading and excavation activities. Additionally, $NO_x$, CO, $PM_{10}$, and $PM_{2.5}$ emissions from engine exhaust would be generated by diesel trucks and construction equipment. Although these construction-related emissions would be temporary, they could expose sensitive receptors to substantial pollutant concentrations during the estimated 29-month Phase 1 construction period and 28-month Phase 2 construction period.

The LSTs listed in Table 3.2-6 below, per SCAQMD guidance, only apply to those emissions generated by on-site construction activities and do not apply to off-site mobile emissions (e.g., haul truck trips). The closest sensitive receptors include the single-family residences to the east and multi-family residences to the north located within 26 meters from the Project site boundary. Off-site worker receptors include employees within the Redondo Village Shopping Center to the north of the Project site. Therefore, LSTs for receptors located within 25 meters from the Project site in SRA 3 were used to determine if the construction emissions associated with Phase 1 and Phase 2 of the proposed Project would result in exceedance of the LSTs (see Table 3.2-6).

**Table 3.2-6. Unmitigated On-site Construction Emissions (lbs/day) Compared to Localized Significance Thresholds for 25 Meter Receptors**

| Emission Source | Sensitive Receptors | | | | Off-site Worker Receptors | |
|---|---|---|---|---|---|---|
| | **CO** | **$NO_2$** | **$PM_{10}$** | **PM2.5** | **CO** | **$NO_2$** |
| ***Phase 1*** | | | | | | |
| 2022 On-site Emissions | 21.3 | **26.8** | 13.5 | **3.0** | 21.3 | **26.8** |
| 2023 On-site Emissions | 30.3 | 23.1 | 1.2 | 1.1 | 30.3 | 23.1 |
| 2024 On-site Emissions | 17.0 | 17.4 | **13.9** | 2.7 | 17.0 | 17.4 |
| ***Phase 2*** | | | | | | |
| 2029 On-site Emissions | 27.5 | 22.6 | 4.1 | 1.3 | 27.5 | 22.6 |
| 2030 On-site Emissions | **34.6** | 14.2 | 0.3 | 0.3 | **34.6** | 14.2 |
| 2031 On-site Emissions | 31.6 | 14.0 | 0.4 | 0.4 | 31.6 | 14.0 |
| ***Localized Significance Threshold*** | *664* | *91* | *5* | *3* | *664* | *91* |
| Above Thresholds? | **No** | **No** | **Yes** | **Yes** | **No** | **No** |

Notes: See Appendix B for CalEEMod output sheets. **Bold** text indicates the highest potential daily emission level over the construction phases. Emissions might not add precisely due to rounding.
SCAQMD LST thresholds are based on:
1 acre of daily disturbed area. This is a very conservative estimate; the construction site is larger than 1 acre and construction activities would be distributed over a larger area, resulting in more disperse emissions. 25-meter separation distance to the closest residential/sensitive receptor. 25-meter separation distance to the closest worker receptor. SRA: 3.
$PM_{10}$ and $PM_{2.5}$ LST thresholds are relevant to sensitive receptors that are reasonably likely to be present for ≥ 24 hours. Since off-site worker receptors are not expected to be present for this duration, significance for particulates does not apply to off-site worker receptors.
Source: SCAQMD 2009.

The greatest levels of daily CO construction emissions are projected to occur during Phase 2 construction (2030). The greatest levels of $NO_x$ and $PM_{2.5}$ construction emissions are projected to occur during Phase 1 construction (2022). The greatest levels of $PM_{10}$ are projected to occur, as fugitive dust emissions, at the end of Phase 1 during demolition of the Beach Cities Health Center (2024). As shown in Table 3.2-6, the Phase 1 construction emissions would exceed LSTs for $PM_{10}$ and $PM_{2.5}$; therefore, air quality impacts to sensitive receptors related to localized temporary construction-related emissions would be *potentially significant* for the Phase 1 preliminary site development plan and *less than significant* for the Phase 2 development program. However, implementation of MM AQ-1, which would require watering exposed soils three times daily and prohibiting demolition when wind speeds are greater than 25 mph, would reduce localized $PM_{10}$ and $PM_{2.5}$ emissions to below SCAQMD's LSTs and mitigated on-site construction emissions would be *less than significant with mitigation*.

Mitigation Measure (MM)

***MM AQ-1*** ***Air Quality Management Plan.*** *The Beach Cities Health District (BCHD) shall prepare an Air Quality Management Plan for construction of the proposed Project, which shall be approved by the City of Redondo Beach and the City of Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. The plan shall include the following conditions for construction:*

- *Construction equipment engines shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.*
- *All construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction to reduce the amount of particulate matter entrained in the ambient air. These measures include the following:*
    - *Quick replacement of ground cover in disturbed areas.*
    - *Watering of exposed surfaces three times daily.*
    - *Watering of all unpaved haul roads three times daily.*
    - *Covering all stock piles with tarp.*
    - *Post signs on-site limiting traffic to 15 miles per hour (mph) or less on unpaved roads.*
    - *Prohibit demolition when wind speed is greater than 25 mph.*
    - *Sweep streets adjacent to the Project site at the end of the day if visible soil material is carried over to adjacent roads.*
    - *Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.*
    - *Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip.*
- *Construction activities associated with the proposed Project shall use U.S. Environmental Protection Agency (USEPA) Tier 4 engines on all construction equipment, except crushing equipment, which would reduce diesel particulate matter (DPM) emissions from combustion by 94 percent for Phase 1 and 79 percent for Phase 2 construction.*
- *Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.*

*Construction contractors shall ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD shall demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction.*

Residual Impact

*Localized Construction Emissions*

Impacts related to construction emissions would be mitigated with implementation of MM AQ-1. In addition to SCAQMD Rule 403 for required fugitive dust control, MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 mph, which would achieve a fugitive dust reduction of 98 percent. The associated reductions in $PM_{10}$ and $PM_{2.5}$ are reflected in the maximum daily on-site construction emissions shown in Table 3.2-7.

**Table 3.2-7. Mitigated On-site Construction Emissions (lbs/day) Compared to Localized Significance Thresholds for 25 Meter Receptors**

| Emission Source | Sensitive Receptors | | | | Off-site Worker Receptors | |
|---|---|---|---|---|---|---|
| | CO | $NO_2$ | $PM_{10}$ | PM2.5 | CO | $NO_2$ |
| ***Phase 1*** | | | | | | |
| 2022 On-site Emissions | 21.3 | **26.8** | **4.4** | **1.6** | 21.3 | **26.8** |
| 2023 On-site Emissions | **30.3** | 23.1 | 1.2 | 1.1 | **30.3** | 23.1 |
| 2024 On-site Emissions | 17.0 | 17.4 | 0.8 | 0.7 | 17.0 | 17.4 |
| ***Phase 2*** | | | | | | |
| 2029 On-site Emissions | 27.5 | 22.6 | 1.2 | 0.9 | 27.5 | 22.6 |
| 2030 On-site Emissions | 34.6 | 14.2 | 0.3 | 0.3 | 34.6 | 14.2 |
| 2031 On-site Emissions | 31.6 | 14.0 | 0.4 | 0.4 | 31.6 | 14.0 |
| ***Localized Significance Thresholds (LSTs)*** | *664* | *91* | *5* | *3* | *664* | *91* |
| Above Thresholds? | **No** | **No** | **No** | **No** | **No** | **No** |

Notes: See Appendix B for CalEEMod output sheets. **Bold** text indicates the highest potential daily emission level over the construction phases. Emissions might not add precisely due to rounding.
SCAQMD LST thresholds are based on:
1 acre of daily disturbed area. This is a very conservative estimate; the construction site is larger than 1 acre and construction activities would be distributed over a larger area, resulting in more disperse emissions. 25-meter separation distance to the closest residential/sensitive receptor. 25-meter separation distance to the closest worker receptor. SRA: 3.
$PM_{10}$ and $PM_{2.5}$ LST thresholds are relevant to sensitive receptors that are reasonably likely to be present for ≥ 24 hours. Since off-site worker receptors are not expected to be present for this duration, significance for particulates does not apply to off-site worker receptors.
Source: SCAQMD 2009.

As shown in Table 3.2-7, implementation of MM AQ-1 would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD LSTs. Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*.

Impact Description (AQ-3)

*b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard.*

**AQ-3 Operational activities associated with the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate criteria air pollutant emissions that would be below South Coast Air Quality Management District (SCAQMD) mass daily thresholds and Localized Significance Thresholds (LSTs). Therefore, this impact would be *less than significant.***

As described in Section 3.2.3.2, *Methodology*, projects with impacts below the SCAQMD thresholds are not considered to contribute considerably to cumulative impacts. The following impact analysis considers peak daily and localized operational emissions generated from construction of the proposed Project, including the Phase 1 preliminary site development plan and the Phase 2 development program. These peak daily and localized operational emissions are evaluated against the SCAQMD's mass daily significance thresholds and LSTs, respectively, to determine whether operation of the proposed Project would contribute to a cumulatively considerable net increase of criteria pollutants.

*Peak Daily Operational Emissions*

Operational emissions associated with the proposed Project would include those generated by the addition of new vehicle trips (mobile emissions) under the Phase 2 development program, the use of landscaping maintenance equipment and consumer products (area source emissions), the use of natural gas (energy emissions), and the use of appliances. New vehicle trips would include employee trips as well as visitor trips to the Project site. As described in Section 3.12, *Population and Housing*, the large majority of employees would commute to the Project site from neighboring cities. Even with average commute times ranging from 10 to 35 minutes, these trips would not substantially contribute to operational emissions. Further, while it is likely that some employees and/or visitors would rely on alternative modes of transportation to travel to and from the Project site, these vehicle trip reductions were not considered in order to provide a conservative analysis.

Operational emissions associated with the proposed Project were estimated using CalEEMod. Mobile, energy, and area (i.e., consumer products, architectural coating, and landscape maintenance equipment) emissions are based on emission factors contained in CalEEMod. Maximum estimated daily operational emissions are detailed in Table 3.2-8.

**Table 3.2-8. Maximum Estimated Operational Emissions Compared to SCAQMD Thresholds (lbs/day)**

| Emission Source | CO | VOC | NOx | SOx | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| ***Phase 1*** | | | | | | |
| Area Emissions | 17.9 | 6.7 | 0.2 | 0.0 | 0.1 | 0.1 |
| Energy Emissions | 0.4 | 0.1 | 0.7 | 0.0 | 0.1 | 0.1 |
| Mobile Emissions | 75.6 | 1.2 | 4.7 | 0.3 | 0.2 | 0.2 |
| Phase 1 Total | **93.9** | **8.0** | **5.6** | **0.3** | **0.3** | **0.3** |
| 2019 Baseline Emissions | 260.9 | 9.5 | 20.7 | 0.7 | 0.5 | 0.5 |
| Phase 1 Net Change | **-167.0** | **-1.5** | **-15.0** | **-0.4** | **-0.2** | **-0.2** |
| ***SCAQMD Thresholds of Significance*** | *550* | *55* | *55* | *150* | *150* | *55* |
| Above Thresholds? | **No** | **No** | **No** | **No** | **No** | **No** |
| ***Phase 2*** | | | | | | |
| Area Emissions | 18.0 | 9.9 | 0.2 | 0.0 | 0.1 | 0.1 |
| Energy Emissions | 0.9 | 0.2 | 1.4 | 0.0 | 0.1 | 0.1 |
| Mobile Emissions | 225.8 | 3.3 | 13.2 | 0.9 | 0.5 | 0.5 |
| Phase 2 Total | **244.7** | **13.4** | **14.8** | **0.9** | **0.7** | **0.7** |
| **2019 Baseline Emissions** | 260.9 | 9.5 | 20.7 | 0.7 | 0.5 | 0.5 |
| Phase 2 Net Change | **-16.2** | **3.9** | **-5.9** | **0.2** | **0.2** | **0.2** |
| ***SCAQMD Thresholds of Significance*** | *550* | *55* | *55* | *150* | *150* | *55* |
| Above Thresholds? | **No** | **No** | **No** | **No** | **No** | **No** |

Notes: Emissions might not add precisely due to rounding. Operational nontraffic, emissions were calculated using CalEEMod. Operational traffic emissions were calculated outside of CalEEMod, based on trips provided in the traffic study. Phase 2 emissions are cumulative - they reflect total emissions following the buildout of Phase 2. See Appendix B for CalEEMod output sheets.
Source: SCAQMD 2019b.

As shown in Table 3.2-8, the maximum emissions anticipated during operation of the Project would not exceed SCAQMD thresholds for $NO_x$, VOC, $PM_{10}$, $PM_{2.5}$, $SO_x$, or CO; therefore, this impact would be *less than significant* under the Phase 1 preliminary site development plan and the more general Phase 2 development program.

*Localized Operational Emissions*

Similar to construction, the LSTs listed in Section 3.2.3, *Impact Assessment and Methodology*, only apply to those emissions generated by on-site operational activities and do not apply to most

of mobile emissions as these would occur largely off-site. As explained above, the LSTs for sensitive receptors within 25 meters of the Project site and are the most conservative LST thresholds and were used to represent the distance to the closest receptors. LSTs and estimates of on-site construction-related Project emissions for the proposed Project are shown in Table 3.2-9.

**Table 3.2-9. On-site Operational Emissions (lbs/day) Compared to Localized Significance Thresholds for 25 Meter Receptors (Unmitigated)**

| Emission Source | Sensitive Receptors | | | | Off-site Worker Receptors | |
|---|---|---|---|---|---|---|
| | CO | $NO_2$ | $PM_{10}$ | $PM_{2.5}$ | CO | $NO_2$ |
| ***Phase 1*** | | | | | | |
| Area | 17.9 | 0.2 | 0.1 | 0.1 | 17.9 | 0.2 |
| Energy | 0.4 | 0.7 | 0.1 | 0.1 | 0.4 | 0.7 |
| Peak Daily Total | 18.3 | 0.9 | 0.2 | 0.2 | 18.3 | 0.9 |
| 2019 Baseline Emissions | 3.9 | 0.5 | 0.1 | 0.1 | 3.9 | 0.5 |
| **Phase 1 Net Change** | **14.4** | **0.4** | **0.1** | **0.1** | **14.4** | **0.4** |
| ***Phase 2*** | | | | | | |
| Area | 18.0 | 0.2 | 0.1 | 0.1 | 18.0 | 0.2 |
| Energy | 0.9 | 1.4 | 0.1 | 0.1 | 0.9 | 1.4 |
| Peak Daily Total | 18.9 | 1.6 | 0.2 | 0.2 | 18.9 | 1.6 |
| 2019 Baseline Emissions | 3.9 | 0.5 | 0.1 | 0.1 | 3.9 | 0.5 |
| **Phase 2 Net Change** | **15.0** | **1.0** | **0.1** | **0.1** | **15.0** | **1.0** |
| *LSTs (5-acre site at 25 meters)* | *1,796* | *197* | *4* | *2* | *1,796* | *197* |
| **Above Thresholds?** | **No** | **No** | **No** | **No** | **No** | **No** |

Notes: Emissions may not add precisely due to rounding.
Mobile emissions are primarily generated offsite; therefore, they are not included here.
SCAQMD LST thresholds are based on:
5-acre site. This is a conservative estimate; the proposed site is larger than 5 acres and activities would be distributed over a larger area, resulting in more disperse emissions. 25-meter separation distance to the closest residential/sensitive receptor. 25-meter separation distance to the closest worker receptor. SRA: 3.
Phase 2 emissions are cumulative - they reflect total emissions following the buildout of Phase 2.
$PM_{10}$ and $PM_{2.5}$ LST thresholds are relevant to sensitive receptors that are reasonably likely to be present for greater than or equal to 24 hours. Since off-site worker receptors are not expected to be present for this duration, significance for particulates does not apply to off-site worker receptors.
Source: See Appendix B; SCAQMD 2009.

As presented therein, the operational emissions associated with the proposed Project would not exceed LSTs for CO, $NO_x$, $PM_{10}$ and $PM_{2.5}$. These results indicate that the proposed Project would not generate levels of operational emissions that would adversely affect local air quality and public health. Therefore, this impact would *less than significant* for both Phase 1 preliminary site development plan and the Phase 2 development program.

Impact Description (AQ-4)

*c) Expose sensitive receptors to substantial pollutant concentrations.*

**AQ-4 Construction-related diesel particulate matter (DPM) emissions – including emissions associated with the Phase 1 preliminary site development plan as well as emissions with the Phase 2 development program – would exceed the South Coast Air Quality Management District's (SCAQMD's) thresholds. However, this impact would be *less than significant with mitigation.***

The sensitive receptors listed in Table 3.2-4 would be exposed to construction and operational TAC emissions generated under the Phase 1 preliminary site development program and the Phase 2 development program. Construction health risks have been quantified as a part of a construction HRA prepared for the proposed Project (refer to Section 3.2.3.2, *Methodology*; see Appendix B). Because the proposed Project would include residential, medical office, general office, and health club uses that would not generate substantial TACs as part of its operations after development (as would be the case for an industrial use) and is not located in close proximity to TAC emitters, operational emissions of TACs are expected to be minor and operational health risks are discussed qualitatively in this EIR.

*Construction*

This analysis evaluated individual lifetime cancer risks and non-cancerous chronic hazard index (HIc) associated with DPM emissions during construction activities under the Phase 1 preliminary site development plan and the Phase 2 development program. The individual lifetime cancer risk represents the chance that an individual would contract cancer after exposure to the TACs emitted during construction of the proposed Project. Cancer risk is quantified by taking into consideration the TAC concentration, receptor breathing rate, duration and frequency of exposure, age sensitivity, and the TAC potency factor developed by OEHHA. The HIc evaluates the probability of TACs to cause adverse non-cancer health effects due to long-term exposure. The HIc is quantified by dividing the TAC concentration at a sensitive receptor location by the TAC reference exposure level (REL) established by OEHHA, where the REL is a concentration below which OEHHA has determined that no adverse health effect is anticipated. It should be noted that the maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer as a result of the proposed Project.

An acute HI, which evaluates the probability of TACs to cause adverse health effects due to short-term exposure, was not quantified for the proposed Project because the chief pollutant of concern is DPM, for which OEHHA has not established an acute REL. OEHHA states that an acute HI analysis of the individual TAC components of diesel exhaust is warranted only in certain unusual situations such as when a nearby receptor is located above the emission release point (e.g., on a hillside or in a multi-story apartment building) (OEHHA 2015). Given the elevated location of the Project site, no unusual situations were identified for the proposed Project which would warrant an acute HI analysis.

Cancer risk and the HIc were quantified at the PMI, MEIR, on-site residences (i.e., existing Silverado Beach Cities Memory Care Community, proposed Assisted Living and Memory Care programs), and the existing Child Development Center within the Beach Cities Health Center (see Table 3.2-10). The PMI was determined to occur on the eastern boundary of the Project site during both Phase 1 and Phase 2 construction. It should be noted that the PMI represents the point of maximum impact regardless of whether a human receptor would be present at that location; no concentration higher than the PMI would occur from the proposed construction activities. The MEIR was determined to occur just east of the Project site, north of Towers Street during Phase 1 construction and south of Towers Street during Phase 2 construction (see Appendix B).

Since Phase 1 and Phase 2 construction activities would occur in different locations within the Project site boundaries, their contribution to cancer risk would be slightly different at the surrounding sensitive receptors. For example, the PMI would occur in a slightly different location during Phase 1 construction than for Phase 2 construction. To capture maximum impacts, cancer risks at the PMI, the MEIR, and on-site sensitive receptors were calculated individually for Phase 1 and for Phase 2 construction, and then the total Phase 1 and Phase 2 cancer risk was added for each receptor type. For example, cancer risk at the PMI for Phase 1 was added to cancer risk at the PMI for Phase 2 even though the Phase 1 PMI would occur in a slightly different location than the Phase 2 PMI. The same approach was done for the MEIR and other on-site receptors. This results in a conservative estimate (i.e., overstating) of cancer risk because the maximum impacts from Phase 1 and Phase 2 were added even though they would actually occur at slightly different locations. The HIc, at each receptor, was determined by taking the maximum calculated HIc from Phase 1 and Phase 2 construction (see Table 3.2-10).

The HRA conservatively assumed cancer risk exposure to off-site residential receptors starting in the third trimester before birth and an exposure duration of 3 years after birth during Phase 1 construction. Cancer risk for the same receptors during Phase 2 conservatively assumed exposure starting in the third year of life and an exposure duration of 3 years, overlapping the duration of Phase 2 construction. Cancer risk at the on-site Child Development Center within the Beach Cities Health Center was quantified from birth, for an exposure duration of 3 years for Phase 1 and Phase 2 construction. Cancer risk for residents of the existing Silverado Beach Cities Memory Care Community were quantified assuming a starting age of 60 and an exposure duration of 3 years during Phase 1 construction. Cancer risk for Assisted Living and Memory Care residents of the proposed RCFE Building also assumed a starting age of 60 and an exposure duration of 3 years during Phase 2 construction.

**Table 3.2-10. Cancer Risk and Non-Cancer Health Effects from Unmitigated Construction DPM Emissions**

| Location | MICR at the Modeled Locations | | | |
|---|---|---|---|---|
| | PMI | MEIR | On-site Residences | Child Development Center |
| **Scenario** | **Start - 3rd trimester Duration - 3 years** | | **Start - 60 Duration - 3 years** | **Start - 0 Duration - 3 years** |
| ***Phase 1*** | | | | |
| Annual Average Concentration (μg/m$^3$) | 0.2498 | 0.2173 | 0.1694 | 0.1694 |
| Cancer Risk | 9.26E-05 (92.6 in a million) | 8.05E-05 (80.5 in a million) | 1.30E-06 (1.30 in a million) | 6.05E-05 (60.5 in a million) |
| Annual Maximum Concentration (μg/m$^3$) | 0.41021 | 0.35686 | 0.27815 | 0.27815 |
| HIc | 0.0820 | 0.0714 | 0.0556 | 0.0556 |
| ***Phase 2*** | | | | |
| Annual Average Concentration (μg/m$^3$) | 0.13302 | 0.09413 | 0.01757 | 0.01757 |
| Cancer Risk | 1.14E-05 (11.4 in a million) | 8.06E-06 (8.06 in a million) | 1.35E-07 (0.13 in a million) | 6.27E-06 (6.27 in a million) |
| Annual Maximum Concentration (μg/m$^3$) | 0.1565 | 0.11075 | 0.02067 | 0.02067 |
| HIc | 0.0313 | 0.0222 | 0.00413 | 0.00413 |
| ***Total*** | | | | |
| Cancer Risk | 1.04E-04 (104 in a million) | 8.86E-05 (88.6 in a million) | 1.44E-06 (1.44 in a million) | 6.68E-05 (66.8 in a million) |
| *SCAQMD Threshold* | *1.00E-05 (10 in a million)* | | | |
| **Above Threshold?** | **Yes** | **Yes** | **No** | **Yes** |
| HIc | 0.0820 | 0.0714 | 0.0556 | 0.0556 |

| Location | MICR at the Modeled Locations | | | |
|---|---|---|---|---|
| | PMI | MEIR | On-site Residences | Child Development Center |
| Scenario | Start - 3rd trimester<br>Duration - 3 years | | Start - 60<br>Duration - 3 years | Start - 0<br>Duration - 3 years |
| *SCAQMD Threshold* | *1.0* | | | |
| **Above Thresholds?** | **No** | **No** | **No** | **No** |

Notes: MICR = maximum individual cancer risk
PMI = point of maximum impact
MEIR = maximum exposed individual resident
HIc = non-cancerous chronic hazard index
$\mu g/m^3$ = micrograms (one-millionth of a gram) per cubic meter air
Annual average emissions were used to quantify cancer risk. Annual maximum emissions were used to quantify non-cancer chronic impacts.
Additional explanatory details are provided in the construction HRA (see Appendix B).

As shown in Table 3.2-10, the unmitigated construction DPM emissions anticipated during construction of the proposed Project are not anticipated to exceed SCAQMD's HIc thresholds of 1.0 under any of the modeled locations and scenarios. The unmitigated construction DPM emissions would exceed SCAQMD thresholds for cancer risk (1.0E-05 or 10 in a million) during Project construction activities; therefore, health risk impacts to sensitive receptors from Project construction activities would be *potentially significant*. However, as described in *Residual Impacts* below, MM AQ-1 would require the use of Tier 4 engines for all construction equipment, except for crushing equipment.[4] The use of Tier 4 Final engines would reduce DPM emissions from combustion by 94 percent during Phase 1 construction and 79 percent during Phase 2 construction (see Table 3.2-11). Therefore, mitigated DPM emissions anticipated during construction activities would not exceed SCAQMD thresholds for cancer risk, and impacts would be *less than significant with mitigation*.

*Operation*

The potential for TACs to have an operational effect on sensitive receptors would occur if the Project site were located near an existing significant source of TACs or if it would generate TACs in quantities that may have an adverse effect on sensitive receptors. CARB identifies high-volume freeways and roads, dry cleaners, and large gas stations as potential sources of TACs, while typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities.

[4] Crushing equipment is unique equipment. Although crushing equipment with Tier 4 Final engines may be available during Phase 2, in particular, this analysis conservatively assumes that crushing equipment would not be equipped with Tier 4 Final engines. This is a conservative assumption because the use of cleaner crushing equipment would further reduce health effects from what is presented in this analysis.

The proposed Project would not include any industrial uses that would generate substantial amounts of TACs and pose a risk to sensitive receptors in the vicinity of the Project site. Project operations would only result in minimal emissions of TACs from maintenance or other ongoing activities, such as from the use of architectural coatings or application of cleaning solutions. Therefore, emissions of toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operations under the Phase 1 preliminary site development plan or the more general Phase 2 development program.

The SCAQMD recommends that operational HRAs be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions (SCAQMD 2003c). Operation of the proposed BCHD Healthy Living Campus would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities. These activities would not meet or exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Further, as previously described, truck trips associated with the proposed Project would be required to comply with the applicable provisions of the CARB regulations to minimize and reduce DPM and $NO_x$ emissions from existing diesel trucks. Therefore, operation of the proposed Project would not be considered a substantial source of diesel particulates.

Typical sources of TACs that may affect future users of the proposed Project involve those same uses and activities identified above. According to CARB's Air Quality and Land Use Handbook, CARB recommends maintaining 500 feet of separation between residences and dry cleaners using perchloroethylene, 500 feet between residences and a major freeway that generates more than 100,000 ADT, and more than 50 feet from a typical gas station. The Project site is not located within these buffer zones from dry cleaners, freeways, or gas stations. The Project site is located approximately 370 feet southeast of the Shell gas station in the Redondo Village shopping center. While a dry cleaner service was historically located within the Redondo Village Shopping Center, this business permanently closed in 2018 (see Section 3.8, *Hazards and Hazardous Materials* for further details regarding the former dry cleaner).

Therefore, long-term operation of the proposed Project would not release substantial amounts of TACs, and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from off-site. TAC pollution controls would not be required for the proposed Project, and *less than significant* impacts on human health would occur.

Residual Impact

*Toxic Air Contaminants Construction Emissions*

Impacts associated with construction-related TAC emissions would be mitigated with implementation of specific components of MM AQ-1. MM AQ-1 requires the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment), which have the strictest USEPA emissions requirement for off-highway diesel engines (refer to Section 3.2.2, *Regulatory Setting*). Cancer risk from Project construction emissions was modeled with the assumption of USEPA Tier 4 engines on all construction equipment, except crushing equipment (see Table 3.2-11). The annual average emissions presented in Table 3.2-11 were used to quantify cancer risk. Annual maximum emissions were used to quantify non-cancer chronic impacts.

**Table 3.2-11. Cancer Risk and Non-Cancer Health Effects from Mitigated Construction DPM Emissions**

| Location | MICR at the Modeled Locations | | | |
|---|---|---|---|---|
| | PMI | MEIR | On-site Residences | Child Development Center |
| Scenario | Start - 3rd trimester<br>Duration - 3 years | | Start - 60<br>Duration - 3 years | Start - 0<br>Duration - 3 years |
| ***Phase 1*** | | | | |
| Annual Average Concentration (μg/m$^3$) | 0.0159 | 0.0138 | 0.0108 | 0.0108 |
| Cancer Risk | 5.88E-06<br>(5.88 in a million) | 5.11E-06<br>(5.11 in a million) | 8.27E-08<br>(0.08 in a million) | 3.86E-06<br>(3.86 in a million) |
| Annual Maximum Concentration (μg/m$^3$) | 0.02373 | 0.02064 | 0.01609 | 0.01609 |
| HIc | 0.00475 | 0.00413 | 0.00322 | |
| ***Phase 2*** | | | | |
| Annual Average Concentration (μg/m$^3$) | 0.02841 | 0.02010 | 0.00375 | 0.00375 |
| Cancer Risk | 2.43E-06<br>(2.43 in a million) | 1.72E-06<br>(1.72 in a million) | 2.88E-08<br>(0.03 in a million) | 1.34E-06<br>(1.34 in a million) |
| Annual Maximum Concentration (μg/m$^3$) | 0.03098 | 0.02192 | 0.00409 | 0.00409 |
| HIc | 0.0062 | 0.00438 | 0.000818 | 0.000818 |
| ***Total*** | | | | |
| Cancer Risk | 8.31E-06<br>(8.31 in a million) | 6.38E-06<br>(6.38 in a million) | 1.12E-07<br>(0.11 in a million) | 5.19E-06<br>(5.19 in a million) |
| ***SCAQMD Threshold*** | ***1.00E-05 (10 in a million)*** | | | |
| **Above Threshold?** | **No** | **No** | **No** | **Yes** |

| Location | MICR at the Modeled Locations | | | |
|---|---|---|---|---|
| | PMI | MEIR | On-site Residences | Child Development Center |
| Scenario | Start - 3rd trimester Duration - 3 years | | Start - 60 Duration - 3 years | Start - 0 Duration - 3 years |
| HIc | 0.0062 | 0.00438 | 0.00322 | 0.00322 |
| ***SCAQMD Threshold*** | *1.0* | | | |
| **Above Thresholds?** | **No** | **No** | **No** | **No** |

Notes: MICR = maximum individual cancer risk
PMI = point of maximum impact
MEIR = maximum exposed individual resident
HIc = non-cancerous chronic hazard index
$\mu g/m^3$ = micrograms (one-millionth of a gram) per cubic meter air
Additional explanatory details are provided in the construction HRA (see Appendix B).

The use of USEPA Tier 4 engines on all construction equipment, except crushing equipment, would reduce DPM emissions from combustion by 94 percent during Phase 1 construction and 79 percent during Phase 2 construction. With the use of Tier 4 engines as required under MM AQ-1, mitigated DPM emissions generated during Project construction activities would not exceed SCAQMD's significance threshold of 10 in a million (1E-05) for cancer risk (refer to Table 3.2-11). Therefore, implementation of MM AQ-1 would reduce DPM emissions below SCAQMD thresholds for cancer risk. Project impacts to sensitive receptors due to temporary, localized construction DPM emissions would be *less than significant with mitigation*.

Impact Description (AQ-5)

*c) Expose sensitive receptors to substantial pollutant concentrations.*

**AQ-5** **The net increase in daily traffic, together with other cumulative traffic in the area, would generate increases in CO levels near local intersections. However, CO levels generated as a result of the proposed Project would not exceed Federal and State CO standards and would not result in CO hotspots. Therefore, this impact would be *less than significant.***

The potential for the proposed Project to cause or contribute to CO hotspots has been evaluated by comparing intersections within the vicinity of the Project site (both intersection geometry and traffic volumes) with the results of prior studies conducted by the SCAQMD in support of their AQMPs. As shown in Table 3.2-3, CO levels near the Project site are substantially below the Federal and State standards. Maximum CO levels in recent years are 1.8 ppm (1-hour average) and 1.6 ppm (8-hour average), which are well below the CAAQS of 20 ppm (1-hour average) and 9.0 ppm (8-hour average). CO levels decreased dramatically in the Basin with the introduction of the

catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for the NAAQS and as a CO maintenance area for the CAAQS. Thus, it is unlikely that CO levels at Project-impacted intersections would result in an exceedance of these standards.

Additionally, SCAQMD conducted CO modeling to demonstrate attainment in the 2003 AQMP for the four worst-case intersections in the Basin, which are:

- Wilshire Boulevard & Veteran Avenue;
- Sunset Boulevard & Highland Avenue;
- La Cienega Boulevard & Century Boulevard; and
- Long Beach Boulevard & Imperial Highway.

In the 2003 AQMP, SCAQMD states that the intersection of Wilshire Boulevard & Veteran Avenue is the most congested intersection in Los Angeles County, with an ADT volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to I-405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue, exclusive of ambient background CO concentrations. When added to the existing background CO concentrations, the screening values would be 7.6 ppm (1-hour average) and 5 ppm (8-hour average), which are still well below the CAAQS of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).

The Non-CEQA Intersection Operational Evaluation for the proposed Project demonstrates that four of the studied intersections within Redondo Beach and Torrance currently operate at LOS E or F during one or both of the AM and PM peak hours and ~~five~~ seven intersections are projected to operate at LOS E or F during one or both of the peak hours in 2032 (without the proposed Project) (see Appendix J). However, the highest total intersection ADT for any of these intersections would be approximately 89,300[5] vehicles at the intersection of Hawthorne Boulevard & Del Amo Boulevard, which is less than the recognized threshold of 100,000 vehicles per day. Therefore, it can be reasonably inferred that CO hotspots do not currently exist at any of the intersections within the Project study area for the Non-CEQA Intersection Operational Evaluation (see Appendix J).

[5] The ADT volume for the Hawthorne Boulevard & Del Amo Boulevard intersection was estimated using the standard assumption that AM peak hour traffic is approximately 8 percent of ADT.

~~Five~~ Seven intersections are projected to operate at LOS E or F during one or both peak periods under future operational year (2032) plus Project conditions (see Appendix J). These intersections are:

- Flagler Lane & 190th Street (AM and PM peak hour);
- Inglewood Avenue & 190th Street (PM peak hour);
- Harkness Lane & Beryl Street (AM and PM peak hour);
- Flagler Lane & Beryl Street (AM and PM peak hour);
- Redbeam Avenue & Del Amo Boulevard (AM and PM peak hour);
- Anza Avenue & Del Amo Boulevard (PM peak hour); and
- Hawthorne Boulevard & Del Amo Boulevard (AM and PM peak hour).

The most heavily trafficked intersection within the vicinity of the Project site that would be affected by the proposed Project is Hawthorne Boulevard & Del Amo Boulevard, which currently experiences approximately 89,300 vehicle trips per day, or approximately 89.3 percent of the 100,000 vehicles per day experienced at the Wilshire Boulevard and Veteran Avenue intersection evaluated in the CO Plan for the SCAQMD's 2003 Air Quality Management Plan (see Appendix J). Under the Phase 2 development program, the proposed Project would increase average daily trips by approximately 376 trips compared to existing trip generation from the Project site. These additional trips would contribute minor amounts of CO emissions to the ~~five~~ seven intersections identified above, which do not produce CO hotspots from existing traffic. With the conservative assumption that all 376 trips per day generated by the proposed Project would pass through the Hawthorne Boulevard & Del Amo Boulevard intersection, this intersection would experience approximately 89,676 vehicle trips per day. This would be approximately 89.7 percent of the 100,000 vehicles per day experienced at the Wilshire Boulevard & Veteran Avenue intersection, which does not generate a CO hotspot. As a result, CO concentrations are expected to be far less than those estimated in the 2003 AQMP for the most congested intersection in Los Angeles and would not create a CO hotspot or exceed the CAAQS for CO concentrations. Therefore, the proposed Project would neither directly result in nor substantially contribute to a CO hotspot and impacts would be *less than significant* during the Phase 2 development program. There would be *no impact* under the Phase 1 preliminary site development plan given the net reduction in vehicle trips.

Impact Description (AQ-6)

*d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

**AQ-6 None of the land uses included in the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in objectionable odors that would affect a substantial number of people. Therefore, this impact would be *less than significant.***

According to SCAQMD's CEQA Air Quality Handbook (1993), objectionable odors are typically associated with industrial uses such as agricultural facilities (e.g., farms and dairies), refineries, wastewater treatment facilities, and landfills. The proposed Project would involve the construction of residential, outpatient medical office, community services, and restaurant uses. During construction, short-term, temporary odors would be expected from construction equipment and paving activities the duration of the two phases of construction. Operationally, odors that would be expected from the proposed Project would be typically associated with food smells (e.g., from the Blue Zones café, Assisted Living and Memory Care kitchens, outdoor dining areas, etc.) and solid waste storage. However, refuse associated with the proposed Project would be consistent with that generated by existing uses on-site and surrounding uses (e.g., existing restaurant and commercial uses in the Redondo Village Shopping Center and surrounding multi-family residences). Further, all refuse would be stored in covered containers and removed regularly consistent with the Redondo Beach's solid waste and recycling pick-up schedules. Therefore, the proposed Project would not be expected to generate objectionable odors that would affect a substantial number of people. Therefore, impacts associated with objectionable odors would be *less than significant* under the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Cumulative Impacts

As described in Tables 3.0-1, 3.0-2, Table 3.0-3, and Table 3.0-4 in Section 3.0.2, *Cumulative Impacts,* there are several pending, approved, and recently completed development projects in Redondo Beach and Torrance as well as the neighboring Hermosa Beach and Manhattan Beach. Development of the proposed Project in conjunction with these projects would result in a cumulative increase in construction and operational criteria air pollutant emissions in the region.

Construction of the proposed Project would potentially overlap with other future projects in the immediate vicinity (e.g., a residential project at 190$^{th}$ Street & Fisk Lane in Redondo Beach and an industrial/warehouse complex in Torrance, which both have been approved). Construction-related emissions from the proposed Project and reasonably foreseeable future development projects (i.e., development projects that have not yet been approved or built) would be localized to the construction sites. It should be noted that Redondo Beach and Torrance have limited control

over the timing or sequencing of many of the future development projects that may occur within the vicinity of the Project site. However, SCAQMD's mass daily emissions thresholds are designed to account for numerous construction projects occurring throughout the Basin. Further, as with the proposed Project, cumulative projects in the Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach as well as other cumulative projects within the wider regional vicinity would be subject to CARB's and SCAQMD's standards, rules, and thresholds to cumulatively control construction emissions.

With regard to cumulative effects related to operation of the proposed Project, the Basin is a nonattainment area for the State standards of $O_3$, $PM_{10}$, and $PM_{2.5}$ (refer to Table 3.2-2). In addition, the Basin is in nonattainment for the Federal standards of $O_3$ and $PM_{2.5}$. Any growth within Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach as well as the Los Angeles metropolitan area would contribute to existing exceedances of ambient air quality standards when taken as a whole with existing development.

Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and SCAQMD, as described below.

According to CEQA Guidelines Sections 15064(h)(3):

> *"A project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including an air quality attainment or management plan) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located."*

As discussed in Impact AQ-1, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would not conflict with the 2016 AQMP, which serves as the Basin's approved AQMP; therefore, the project's contribution to air quality impacts would not be cumulatively considerable under CEQA.

As described in Section 3.2.3.2, *Methodology*, SCAQMD's cumulative significance thresholds are the same are the same as project-specific significance thresholds. As such, the SCAQMD considers projects that do not exceed the project-specific thresholds to not contribute considerably to a cumulatively significant impact (SCAQMD 2003b).

Temporary construction emissions are discussed under Impacts AQ-2 and AQ-4. The construction emissions associated with the proposed Project would not exceed SCAQMD mass daily emissions thresholds, but would exceed LSTs for $PM_{10}$ and $PM_{2.5}$. However, with implementation of MM

AQ-1, construction emissions would be reduced, and mitigated construction emissions would not exceed LSTs. Similarly, implementation of MM AQ-1 would reduce construction DPM emissions below SCAQMD's threshold for cancer risks. As discussed under Impact AQ-3, the long-term operational emissions associated with the proposed Project would not exceed SCAQMD significance thresholds. Therefore, the construction and operational emissions associated with the proposed Project would not be cumulatively considerable under SCAQMD methodology.

Because the mitigated construction- and operation-generated emissions associated with the proposed Project would not exceed either the thresholds used to evaluate cumulative impacts to air quality, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – *would not result in a substantial contribution to cumulatively considerable air quality impacts*.

## 3.3 BIOLOGICAL RESOURCES

This section of the Environmental Impact Report (EIR) describes the existing biological resources at the Beach Cities Health District (BCHD) campus and the surrounding vicinity and analyzes potential impacts that could result from the implementation of the proposed BCHD Healthy Living Campus Master Plan (Project). This analysis is based on the technical assessments provided by a Biological Evaluation prepared by Hamilton Biological, Inc. (2019a), a Nesting Bird Survey Report prepared by Hamilton Biological, Inc. (2019b), and a Tree Inventory Report prepared by Carlberg Associates (2019) (see Appendix C). Each of these technical studies has been peer reviewed by Wood Environment & Infrastructure, Inc. (Wood) senior biologists, with decades of experience conducting vegetation surveys and nesting bird surveys throughout Southern California.

The BCHD campus is located approximately 1 mile inland and outside of the Coastal Zone boundary, occupying a densely-developed area surrounded by residential and commercial land uses (refer to Section 2.2.1, *Project Location*). Due to the developed, urbanized character of the Project site and the surrounding vicinity and the lack of native habitat, there are no biological resources on-site that are considered significant under the California Environmental Quality Act (CEQA), except for non-native landscaped trees that have the potential to provide nesting and roosting habitat for migratory birds. Therefore, the analysis of effects to biological resources provided in this EIR is generally limited to potential impacts related to the removal or alteration of nesting or roosting trees.

### 3.3.1 Environmental Setting

Regional Setting

Redondo Beach and Torrance are located within Los Angeles County, situated approximately 7 miles south of the Los Angeles International Airport (LAX) at the southern edge of the Santa Monica Bay and approximately 20 miles south of the Santa Monica Mountains. Redondo Beach and Torrance are developed cities characterized almost entirely with buildings, parking lots, paved roads, sidewalks, and other urban development. There is very little native terrestrial vegetation in the area. Most large groupings of mature trees, shrubbery, and other low-growing vegetation is found in parks and other small, isolated open spaces. Most of the vegetation in Redondo Beach

and Torrance consists of commercial and residential landscaping. This vegetation provides limited habitat for urban-dwelling rodents and feral and domesticated mammals. However, street trees and other landscaped trees throughout the cities provide potential nesting and roosting sites for resident and migratory birds.

*The Project site is located adjacent to Dominguez Park. Landscaped trees at this location could provide habitat or roosting for residential and migratory species.*

Several small (i.e., less than 6 acres) wetlands – identified in the National Wetlands Inventory (NWI) – are located in Redondo Beach and Torrance; however, none of these wetlands are located in the immediate proximity of the Project site (U.S. Fish and Wildlife Services [USFWS] 2020a). As such, the operation of the campus has no direct or indirect effects on their ecological function. These wetland features are not visible from the campus, do not receive runoff from the campus, and are not affected by nighttime lighting from the campus.

*Los Angeles County Significant Ecological Areas*

Redondo Beach and Torrance are located in close proximity to the Pacific Ocean as well as four Significant Ecological Areas (SEAs), which is a designation given by Los Angeles County to lands that contains irreplaceable biological resources. These SEAs – including the Madrona Marsh Preserve, El Segundo Dunes, Ballona Wetlands, and Santa Monica Mountains – serve as larger blocks of native habitat that support special status species and, in some cases, riparian habitat or other sensitive natural communities. However, none of these SEAs are located in the close proximity to the Project site. The Madrona Marsh is located approximately 2.5 miles from the campus, while the Santa Monica Mountains SEA is located more than 20 miles from the campus. As such, the operation of the campus has no direct or indirect effects on their ecological function. The SEAs are not visible from the campus, do not receive runoff from the campus, and are not affected by nighttime lighting from the campus.

*Wildlife Corridors*

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for dispersal or migration. Wildlife corridors contribute to population viability by ensuring continual exchange of genes between populations, providing access to adjacent habitat areas for foraging and mating, and providing routes for recolonization of habitat after local extirpation or

ecological catastrophes such as fires. Habitat linkages are smaller patches of habitat that join larger blocks of habitat and generally reduce the adverse effects of habitat fragmentation associated with surrounding development. Habitat linkages may be represented by continuous patches of habitat or by nearby habitat *"islands"* that function as steppingstones for dispersal and movement – particularly for birds and flying insects. Given the extent of surrounding development, and the distances between larger blocks of habitat (including SEAs), there are no designated regional habitat linkages between the SEAs. Additionally, there are no terrestrial wildlife corridors traversing the City of Redondo Beach or the City of Torrance.

The Pacific Flyway is a major north-south route of travel for migratory birds in America, extending along the Western American coast from Alaska south to the Patagonia region in South America (USFWS 2020b). Migratory birds travel some or all of this distance annually to follow food sources, head to breeding grounds, or travel to suitable overwintering sites. Along the Pacific Flyway, there are many key *"rest stops"* or temporary habitat areas where some bird species gather to feed and recuperate. For example, the Ballona Wetlands are one of many rest stops along the Pacific Flyway. Some species may remain in these rest stops for the entire season, but most stay a few days before moving on. Redondo Beach and Torrance are located along the Pacific Flyway and may host migratory birds using street trees or other landscaped trees or shrubs as rest stops. The Monarch butterfly (*Danaus plexippus*)[1] also migrates along the Pacific Flyway and roosts in locations along the Pacific coastline, typically where eucalyptus trees (*Eucalyptus* spp.) and occasionally pine trees (*Pinus* spp.) are located. However, there are no known roosting sites for migratory species or Monarch butterflies within Redondo Beach or Torrance.

Project Setting

The description of biological resources at the Project site is based on a Biological Evaluation prepared by Hamilton Biological, Inc. (2019a), a Nesting Bird Survey Report prepared by Hamilton Biological, Inc. (2019b), and a Tree Inventory Report prepared by Carlberg Associates (2019) (see Appendix C).

The Project site is bordered by residential land uses to the west, south, east and the Redondo Village Shopping Center to the north (refer to Section 2.2.2, *Surrounding Land Uses*; refer to Figure 2-2). Additionally, the Project site is surrounded by heavily trafficked, arterial roadways including North Prospect Avenue to the southwest and Beryl Street to the north. Diamond Street to the southeast and Flagler Lane to the east support lighter, residential traffic. All surrounding

[1] The listing status of the monarch butterfly under the Endangered Species Act (ESA) is currently under review. In 2014, the USFWS was petitioned to protect the monarch butterfly under the Endangered Species Act. A species status assessment report is currently being prepared. The final listing decision of the monarch is expected in December 2020 (USFWS 2020c).

roadways are lined with concrete sidewalks, aboveground utilities, streetlights, and occasional street signs with very little urban landscaping.

*The Project site is generally characterized by paved surfaces; however, the steep slope along Flagler Alley as well as the vacant Flagler Lot include landscaped trees and shrubs. which may provide habitat for nesting birds.*

The campus is approximately 90 percent paved and developed with multi-story buildings and paved parking lots. The majority of landscaped vegetation occurs along the perimeter of the Project site, with larger stands of landscaped trees occurring along the Project site frontage with Diamond Street, Flagler Lane, and Flagler Alley. The vacant Flagler Lot at the intersection of Flagler Lane & Beryl Street is undeveloped and characterized by patches of low-growing weedy vegetation.

*Vegetation*

Vegetation occurring on and immediately adjacent to the Project site (e.g., within the Redondo Village Shopping Center) consists primarily of non-native species commonly used in commercial landscaping, such as silver dollar eucalyptus (*Eucalyptus polyanthemos*), Mexican fan palm (*Washingtonia robusta*), wild radish (*Raphanus sativus*), Bermuda grass (*Cynodon dactylon*), and crab grass (*Digitaria sanguinalis*). A list of landscaped plant species observed during the field survey conducted by Hamilton Biological, Inc. (2019a) is provided in Table 3.3-1. No native habitats were identified within the Project site (Hamilton Biological, Inc. 2019a).

## Table 3.3-1. Plant Species Observed on the Project Site

| Common Name | Species Name |
|---|---|
| ***Herbaceous Weeds*** | |
| Wild raddish | *Raphanus sativus* |
| Garland chrysanthemum | *Glebionis coronaria* |
| Cheeseweed | *Malva parviflora* |
| Puncturevine | *Tryonia imitator* |
| London rocket | *Sisymbrium irio* |
| Dandelion | *Taraxacum officinale* |
| ***Exotic Grasses*** | |
| Smilo grass | *Piptatherum miliaceum* |
| Bermuda grass | *Cynodon dactylon* |
| Crab grass | *Digitaria sanguinalis* |
| ***Trees*** | |
| Blackwood acacia | *Acacia melanoxylon* |
| Golden wreath wattle | *Acacia saligna* |
| African fern pine | *Afrocarpus falcatus* |
| Lemons bottle brush | *Callistemon citrinus* |
| Floss silk tree | *Ceiba speciose* |
| Bronze loquat | *Eriobotrya deflexa* |
| Japanese loquat | *Eriobotrya japonica* |
| Spider gun | *Eucalyptus conferruminate* |
| Flooded gum | *Eucalyptus rudis* |
| Weeping palm | *Ficus benjamina* |
| Indian laurel fig | *Ficus microcarpa* |
| Australian willow | *Geijera parviflora)* |
| Jacaranda | *Jacaranda mimosifolia* |
| Hollywood juniper | *Juniperus chinensis 'Torulosa'* |
| Brisbane box | *Lophostemon confertus* |
| Paperbark | *Melaleuca quinquenervi* |
| Olive tree | *Olea europaea* |
| Canary Island date palm | *Phoenix canariensis* |
| Fraser photinia | *Photinia x fraseri* |
| Canary Island pine | *Pinus canariensis* |
| Aleppo pine | *Pinus halepensis* |
| Brazillian pepper | *Schinus terebinthifolius* |
| Queen palm | *Syagrus romanzoffiana* |
| Mexican fan palm | *Washingtonia robusta* |

Notes: This list of plant species on the Project site includes the existing campus as well as the vacant Flagler Lot.
Source: Hamilton Biological, Inc. 2019a.

A separate Tree Inventory Report was prepared for the Project site to inventory all of the individual trees within and immediately adjacent to the Project site (Carlberg Associates 2019). The Tree Inventory Report identified 228 trees ranging from 5 to 51 feet in height and 1 to 29 inches in diameter (measured at a height of approximately 4.5 feet). Larger mature landscaped trees occur along the Diamond Street as well as Flagler Lane and Flagler Alley, which form the eastern boundary of the Project site. Other slightly smaller landscaped trees are commonly found adjacent to existing buildings (e.g., Beach Cities Advanced Imaging Building).

*The Project site is entirely developed and almost completely covered with paved surfaces; however, landscaping including trees and shrubs occur along the perimeter of the Project site and in planters near the existing buildings. The larger mature trees occur along the eastern boundary of the Project site adjacent to Diamond Street as well as Flagler Lane and Flagler Alley. Smaller trees, shrubs, and turf grass are located adjacent to the building footprint.*

Carlberg Associates (2019) graded the physiological condition (i.e., health) of the trees on a scale of A through F. The physiological condition of a majority of trees on Project site received a rating of A (Outstanding with good growth form and vigor) or B (Above Average with minor symptoms of stress or disease) (Carlberg Associates 2019). A similar grading scale was used to rate trees' structural condition. Over 97 percent of trees located on the Project site received a rating of C (Average, or moderate structure with defects, decay, or disease).

*Wildlife*

Wildlife species were observed during the field survey associated with the Biological Evaluation (2019a) and Nesting Bird Survey Report (2019b). These species – including several birds, sandy beach tiger beetle, and western fence lizard – are identified in Table 3.3-2.

**Table 3.3-2. Wildlife Species Observed on the Project Site**

| Common Name | Species Name |
|---|---|
| ***Birds*** | |
| Cedar waxwing | *Bombycilla cedrorum* |
| Anna's hummingbird | *Calypte anna* |
| Swainson's thrush | *Catharus ustulatus* |
| Rock pigeon* | *Columba livia* |
| American crow | *Corvus brachyrhynchos* |
| Yellow warbler | *Dendroica petechia* |
| Pacific-slope flycatcher | *Empidonax difficilis* |
| Hooded oriole | *Icterus cucullatus* |
| California towhee | *Melozone crissalis* |
| House sparrow* | *Passer domesticus* |
| Lazuli bunting | *Passerina amoena* |
| Blue grosbeak | *Passerina caerulea* |
| Black-headed grosbeak | *Pheucticus melanocephalus* |
| Western tanager | *Piranga ludoviciana* |
| Bushtit (Pacific) | *Psaltriparus minimus* |
| House finch | *Rallus longirostris levipes* |
| Black phoebe | *Sayornis nigricans* |
| Allen's hummingbird | *Selasphorus sasin* |
| Hermit warbler | *Setophaga occidentalis* |
| Lesser goldfinch | *Spinus psaltria* |
| Eurasian collared-dove* | *Streptopelia decaocto* |
| European starling* | *Sturnus vulgaris* |
| Orange-crowned warbler | *Vermivora celata* |
| Warbling vireo | *Vireo gilvus* |
| Wilson's warbler | *Wilsonia pusilla* |
| Mourning dove | *Zenaida macroura* |
| ***Invertebrates*** | |
| Sandy beach tiger beetle | *Cicindela hirticollis gravida* |
| ***Reptiles*** | |
| Western fence lizard | *Sceloperus occidentalis* |

Notes: *Non-native species
Source: Hamilton Biological, Inc. 2019b.

Many of the birds observed are migratory species that generally do not nest in Redondo Beach or Torrance. However, one active Allen's hummingbird nest was detected during the field survey associated with the Nesting Bird Survey Report (Hamilton Biological, Inc. 2019b).

No mammals were detected during the field survey, but expected species include the non-native eastern fox squirrel (*Sciurus niger*) and several native species, including the botta pocket gopher (*Thomomys bottae*), raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), and Striped skunk (*Mephitis mephitis*) (Hamilton Biological, Inc. 2019a). Due to the presence of the Silverado Memory Care Community and associated dining services on the campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus.

*Special-Status Species*

The California Natural Diversity Database (CNDDB) is an inventory of the status and locations of rare plants and wildlife in California, maintained by the California Department of Fish and Wildlife (CDFW). The CNDDB organizes regional data by 7.5-minute quadrangle maps. Federal and State listed species known to occur in the Redondo Beach quadrangle map, where the Project site is located, includes recorded observations of the federally endangered Pacific pocket mouse (*Perognathus longimembris pacificus)*, federally endangered Palos Verdes blue butterfly (*Glaucopsyce Iygdamus palosverdesenis*), federally endangered El Segundo blue butterfly (*Eupilotes battoides allyni)*, State endangered willow flycatcher (*Empidonax traillii*), State threatened beach spectaclepod (*Dithyrea maritima)*, and State candidate endangered Croth bumle bee (*Bombus crotchii)* (CDFW 2021). However, given the developed, urbanized character and the lack of undisturbed native habitats within Project site and surrounding vicinity, the potential for special-status wildlife species to occur at the Project is very low (Hamilton Biological, Inc. 2019a).

Based on the review of the CNDDB and the habitat assessment conducted by Hamilton Biological, Inc. (2019a) three special status species would have the potential to occur on the Project: Cooper's Hawk (*Accipiter cooperii*), southern tarplant (*Centromadia parryi*) and the monarch butterfly (*Danaus plexippus*) (see Table 3.3-3).

**Southern Tarplant.** Southern tarplant is designated as California Rare Plant Rank (CRPR) by the California Native Plant Society (CNPS) and typically occurs on flat, disturbed ground near the coast that receives intermittent flooding. The vacant Flagler Lot in the northeastern corner of the Project site has marginal potential to support southern tarplant. However, the species very rarely occurs in disturbed areas and no signs of the plant were observed during the field survey. Therefore, this species is considered to have a very low potential to occur on the Project site (Hamilton Biological, Inc. 2019a).

## Table 3.3-3. Special-Status Species with Potential to Occur On-site

| Common Name | Species Name | Habitat | Occurrence or Potential for Occurrence | Status |
|---|---|---|---|---|
| ***Plants*** | | | | |
| Southern tarplant | *Raphanus sativus* | Flat, disturbed ground near the coast that receives intermittent flooding. | **Very Low** Suitable habitat present; known historically in region | CRPR 1B.1 |
| ***Invertebrates*** | | | | |
| Monarch butterfly | *Piptatherum miliaceum* | Overwinter in groves of eucalyptus or pines, in natural areas between a half-mile and one mile from the coast. | **Low** Suitable pine habitat present; known historically in region | -* |
| ***Birds*** | | | | |
| Cooper's Hawk | *Accipiter cooperii* | Found in a variety of vegetated habitats including urban, suburban, and rural. Requires large trees for nesting. | **High** Moderate potential to breed in vicinity; high potential to occur during migration and/or winter | WL |

Notes:
**California Rare Plant Rank (CRPR)**
1B – Plants rare, threatened or endangered in California and elsewhere
0.1 – Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
**State Rank**
S2: Imperiled – At high risk of extirpation in the State due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
S3: Vulnerable – At moderate risk of extirpation in the State due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
S4: Apparently Secure – At a fairly low risk of extirpation in the State due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
**State Status**
WL – Watch List
**Federal Status**
*On December 15, 2020, the USFWS announced that listing the monarch as endangered or threatened under the ESA is warranted but precluded by higher priority listing actions (USFWS 2021). The ESA provides for a warranted-but-precluded finding when the Service does not have enough resources to complete the listing process because the agency must first focus on higher-priority listing rules (USFWS 2020c). With this decision, the monarch becomes a candidate for listing under the ESA, and its status will be reviewed each year until it is no longer a candidate.
Source: Hamilton Biological, Inc. 2019a.

**Monarch Butterfly.** The Monarch butterfly is considered a California Special Animal. *"Special Animal"* is a broad term used to refer to all the animal taxa tracked by the CDFW in the CNDDB, regardless of their legal or protection status. Monarch butterflies passes through Southern California to overwinter in substantial groves of eucalyptus, and occasionally pines, in natural areas between 0.5 miles and 1 mile from the coast. While the Project site contains mature pine trees, they are relatively small in size and sparsely located throughout the Project site. Therefore, existing pines on-site do not provide suitable overwintering habitat for monarchs. Therefore, monarch butterflies are unlikely to occur on the Project site (Hamilton Biological, Inc. 2019a).

**Cooper's Hawk.** Cooper's hawk, which is listed on the CDFW Watch List, is a common and widespread raptor species found frequently in urban and suburban areas across Southern California. Cooper's hawk has a moderate potential to breed in the vicinity of the Project site due to rapid expansion of the breeding population into urban and suburban areas. Cooper's hawk has a high potential to be present on the Project site during winter or migration periods. The large mature trees located along the perimeter of the Project site would provide potential roosting areas during seasonal migration. Cooper's hawks that nest in urban areas use tall mature trees found in parks, commercial, and industrial areas (Lepczyk and Warren 2019). Cooper's hawks that use urban areas for habitat also subsist off small and medium sized birds abundant in urban areas (Lepczyk and Warren 2019). Therefore, the Cooper's hawk has potential to nest and forage at the Project site or immediate vicinity (Hamilton Biological, Inc. 2019a).

In summary, the Project site is nearly fully developed and does not provide intact native habitats. No riparian habitat, aquatic features, or other sensitive natural communities, or jurisdictional wetlands are located on or in the vicinity of the Project site. While located along the Pacific Flyway, it is not part of any recognized wildlife corridors or habitat linkages. No federally listed, State-listed, or candidate species have the potential to occur on the Project site. Cooper's hawk, listed on the CDFW Watch List, is the only special status species with a high-potential to occur on the Project site.

### 3.3.2 Regulatory Setting

Significant biological resources – including plants, wildlife, and their habitats – are subject to multiple Federal, State, and local laws, regulations, and policies that are designed to protect sensitive, threatened, or otherwise special-status species from displacement and loss.

Federal Policies and Regulations

*Clean Water Act (CWA)*

The Clean Water Act (CWA) authorizes Federal, State, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of State waters and tributaries. Key provisions of the CWA address water quality standards and the establishment of the National Pollutant Discharge Elimination System (NPDES) program for controlling the discharge of stormwater.

*Endangered Species Act*

The purpose of the Federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. The Federal ESA is administered by the USFWS and the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales, and anadromous fish (e.g., salmonids).

Under the Federal ESA, species may be listed as either endangered or threatened. *"Endangered"* means a species is in danger of extinction throughout all or a significant portion of its range. *"Threatened"* means a species is likely to become endangered within the foreseeable future.

*Migratory Bird Treaty Act*

The Migratory Bird Treaty Act (MBTA) (16 U.S. Code [USC] §§703-711) includes provisions for the protection of migratory birds, including the non-permitted take of migratory birds, under the authority of the USFWS and CDFW. The MBTA makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds, and prohibits the removal of nests occupied by migratory birds. Over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many common species are protected under the MBTA.

State Policies and Regulations

*California Endangered Species Act*

The California Endangered Species Act (CESA) declares that all native plant or wildlife species threatened with extinction and those experiencing a significant decline will be given protection by the State because they are of ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people. CESA establishes that it is State policy to conserve, protect, restore, and enhance endangered species and their habitats. Under State law, plant and wildlife species may be formally designated as rare, threatened, or endangered. Listed species are given greater attention during the land use planning process by local governments, public agencies, and landowners than are species that have not been listed.

*Native Plant Protection Act*

The Native Plant Protection Act (NPPA) and implementing regulations in of the California Fish and Game Code Section 1900 *et seq.* designates rare and endangered plants and provides specific

protection measures for identified populations. The NPPA was enacted to, *"preserve, protect, and enhance endangered or rare native plants of this State."* The NPPA defines a plant as endangered when its prospects of survival and reproduction are in immediate jeopardy from one or more causes. A rare plant is defined as a plant species that, though not presently threatened with extinction, occurs in such small numbers throughout its range that it may become endangered if its present environment worsens. The NPPA prohibits the take or sale of rare and endangered plants in California. However, the law includes broad exemptions to the prohibition of take, including removal of endangered or rare plants from a building site, road, or right-of-way.

*California Fish and Game Code (Sections 3503, 3503.5, and 3800)*

California Fish and Game Code Sections 3503, 3503.5, and 3800 prohibit the take or possession of birds, their nests, or eggs. Disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young) is considered a take. Such a take would also violate Federal law protecting migratory birds. Incidental Take Permits are required from the CDFW for projects that may result in the incidental take of species listed as endangered, threatened, or candidate species. The permits require that impacts to protected species be minimized to the extent possible and mitigated to a level of insignificance.

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Land Use Element*

The Redondo Beach General Plan Land Use Element establishes goals, objectives, policies, and implementation programs to guide the manner in which new development will occur and existing uses will be conserved. The following policies aim to create and maintain high quality visual landscapes throughout the City.

Objective 1.55: Provide for the landscaping of residential, commercial, industrial and public sites to be compatible with existing development exhibiting significant and recognized landscape and site design assets and establish an improved visual image and landscape quality where not currently existing in the City.

Policy 1.55.1 Review existing and modify, as necessary, landscaping standards and guidelines for development which promote a high level of visual and environmental quality and require developers to incorporate adequate landscape on-site (I1.18).

Policy 1.55.2 Select landscape and tree species which complement the architectural design of structures and reflect the intended functional, physical, and visual character of the district in which they are located (I1.18).

Policy 1.55.3 Require that development projects submit and implement a landscaping plan (I1.1, I1.7).

Policy 1.55.5 Encourage developers to incorporate mature and specimen trees and other significant vegetation which may exist on a site into the design of a development project for that site (I1.18).

Policy 1.55.6 Require that surface parking lots incorporate trees which will provide extensive shade cover within two years of completion of construction (e.g., canopy coverage versus vertical palms) (I1.1, I1.7, I1.18).

Policy 1.55.7 Encourage the use of drought-tolerant species in landscape design (I1.1, I1.18).

*Redondo Beach Municipal Code*

Redondo Beach Municipal Code (RBMC) Section 10-~~5~~2.1900 aims to establish standards for installation of landscaping in order to enhance the aesthetic appearance of properties within the City, ensure the quality, quantity, and appropriateness of landscape materials, effect a functional and attractive design, improve compatibility between land uses, conserve water, control soil erosion, and preserve the character of existing neighborhoods. Landscaping plans of projects within the City shall comply with the following criteria:

- **Plant Location**. All required setbacks shall be landscaped with live plants except for walkways, driveways, parking areas and patio areas. Non-organic groundcover shall not be used in place of plant material in planter areas unless utilized as a decorative accent.
- **Plant type**. Drought-tolerant plants shall be used where feasible. Recommended drought-tolerant plant species are listed in the City of Redondo Beach List of Recommended Trees and Water Conserving Plants maintained by the Superintendent of Parks.
- **Plant size**. Plants shall be sized and spaced to achieve immediate effect and shall normally not be less than a 15-gallon container for trees, 5-gallon container for shrubs, and a one-gallon container for mass planting. Groundcover coverage must be 100 percent in one year, with rooted cuttings from flats planted no more than 12 inches on center, and containerized

woody, shrub ground cover planted no more than 3 feet on center. Landscape plans shall incorporate existing mature trees with trunk diameters of 6 inches or greater that are compatible with the proposed grades, structures and hardscape. Specimen trees, 36-inch box, or larger may be used to replace an existing mature tree that cannot feasibly be saved.

- ~~**Landscape plans**. Landscape plans shall incorporate existing mature trees with trunk diameters of 6 inches or greater that are compatible with the proposed grades, structures, and hardscape. Specimen trees, 36-inch box, or larger may be used to replace an existing mature tree that cannot feasibly be saved.~~
- ~~**Parking lots**. New surface parking lots containing 10 or more parking spaces shall provide a minimum of one shade tree for every 6 spaces. The Planning Commission may also require provision of trees and other landscaping in parking lots in conjunction with any project subject to Planning Commission Design Review.~~
- ~~**Landscape and irrigation plans required, for projects other than single-family developments**. A landscape plan and irrigation plan drawn to scale and dimensioned shall be submitted to the Planning Division for all new projects in all nonresidential zones, and for all new residential projects of two or more units. A landscape plan and irrigation plan may be required in conjunction with other projects requiring Administrative Design Review, Planning Commission Review, Conditional Use Permit, or Variance.~~
- **Planting Areas**. All planting areas shall be served by a permanent underground clock-operated water-efficient irrigation system. A drip irrigation system or other water conserving irrigation system may be required where feasible. All sloped planting areas abutting hardscape shall be surrounded with a minimum 6 inch high concrete curb where necessary to prevent erosion.
- **Parking Lots**. New surface parking lots containing 10 or more parking spaces shall provide a minimum of one shade tree for every 6 spaces. The Planning Commission may also require provision of trees and other landscaping in parking lots in conjunction with any project subject to Planning Commission Design Review.

City of Torrance Local Policies and Regulations

*Torrance General Plan Community Resources Element*

The Torrance General Plan Community Resources Element establishes goals, objectives, policies, and implementation programs to enhance of community qualities that distinguish Torrance. The following policies focus on the preservation and management of open space, providing parks,

recreation, and community facilities for all residents, historic preservation, natural resource conservation, preservation of scenic resources, managing energy resources, reducing greenhouse gas emissions, and promoting sustainable building practices.

Objective CR.18: Preserve significant strands of trees and to establish a comprehensive plan to protect and enhance the urban forest.

Policy CR.18.1 Preserve specimen trees whether they occur on public or private property and promote the planting of new trees.

Policy CR.18.2 Provide, maintain, and encourage appropriate street trees along all sidewalks and property frontages.

*Torrance Municipal Code*

Tree protection and maintenance measures are provided in the Torrance Municipal Code (TMC) Sections 75.1.1 through 75.2.7, which constitutes the Torrance Tree Ordinance:

Section 75.1.5(a): No person may cut, trim, remove, prune, plant, injure or interfere with any tree upon any street, park, alley or public place of the City without first obtaining a permit from the Public Works Director. The permit will be valid for 30 days.

Section 75.1.11: During the erection, repair, alteration or removal of any building, house or structure in the City, no person in charge of such work shall leave any tree, shrub or plant in any street, park, boulevard, alley or public place of the City in the vicinity of such building or structure without good and sufficient guards or protectors as shall prevent injury to such tree, shrub or plant arising out of or by reason of the erection, repair, alteration or removal.

*Torrance Street Tree Planting Plan*

The Torrance Street Tree Master Plan, adopted in April 2015, was created to enhance and preserve the city's trees by having a set list of recommended trees that would best fit each area of the City. The Torrance Street Tree Planting Matrix (2015) provides the following tree species recommendations for Beryl Street and Flagler Lane:

Beryl Street:

- Indian Laurel Fig (*Ficus microcarpa*)
- Saint Mary Magnolia (*Magnolia grandiflora*)

- Bronze Loquat (*Eriobotrya deflexa*)
- Toyon (*Heteromeles arbutifolia*)

Flagler Lane:

- Strawberry Tree (*Arbutus unedo*)
- Hong Kong Orchid Tree (*Bauhinia blakeana*)
- Chinese Fringe Tree (*Chionanthus retusus*)

### 3.3.3 Impact Assessment Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on biological resources if:

a) The project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS.

b) The project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

c) The project would have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) The project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e) The project would conflict with any Federal, State, local policies or ordinances protecting biological resources, such as tree preservation policy/ordinance.

f) The project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

*Screened-Out Threshold(s):*

- Threshold (a) (*Sensitive Species*): The existing campus is fully developed with multi-story buildings and paved surfaces. Vegetation on the Project site is limited to landscaped trees, shrubs, and grasses. Additionally, the Project site is surrounding by residential and commercial development as well as arterial roadways. As described in the Biological Evaluation prepared by Hamilton Biological, Inc. (2019a) no federally listed or State-listed species are known to occur on the Project site or the immediate surrounding vicinity. Species expected to occur on-site would be limited to animals that are commonly found in urban environments. Therefore, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the Initial Study (IS), this issue is not further analyzed in the EIR. Potential impacts to migratory birds associated with the removal of landscaped vegetation is discussed further under Impact MM BIO-1.
- Threshold (b) (*Sensitive Natural Communities*): Existing vegetation on-site is limited to landscaped trees, shrubs, and grasses. No sensitive natural community including wetlands, streams, creeks, lakes, vernal pools, marshes, other water bodies, or riparian habitats exists on the Project site or in the surrounding vicinity. Therefore, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the IS, there would be no adverse effects to sensitive natural communities and this issue is not further analyzed in the EIR.
- Threshold (c) (*Wetlands*): The Project site does not contain and is not located in close proximity to any wetland areas. There would be no filling, dredging, or other modification to wetland areas, and no impacts would occur. Therefore, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the IS, this issue is not further analyzed in the EIR.
- Threshold (d) (*Wildlife Corridors*): Due to the developed, urbanized nature of the Project site and the surrounding vicinity, there are no recognized wildlife corridors or habitat linkages. Re-development of the existing campus would not result in short- or long-term impacts to the movement of fish or wildlife species. Similarly, the re-development of the existing campus would not result in impacts to nursery sites. Therefore, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the IS, this issue is not further analyzed in the EIR. Potential impacts to migratory birds associated with the removal of landscaped vegetation is discussed further under Impact BIO-1.
- Threshold (f) (*Habitat Conservation Plan*): The Project site is devoid of significant habitat identified in any Federal, State, and local conservation plans. Additionally, the Project site is not located within a planning area for any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other conservation plans. As such, for the reasons

stated above and as discussed in Section IV, *Biological Resources* of the IS, the proposed Project would not conflict with any adopted conservation plans, and this issue is not further analyzed in the EIR.

Methodology

As previously described, this analysis is based on a Biological Evaluation prepared by Hamilton Biological, Inc. (2019a), a Nesting Bird Survey Report prepared by Hamilton Biological, Inc. (2019b), and a Tree Inventory Report prepared by Carlberg Associates (2019). The Biological Evaluation consisted of literature review – including a review of the CNDDB and the CNPS Inventory of Rare and Endangered Plants – as well as a field survey conducted on May 9, 2019. (Another separate field survey was conducted on July 9, 2019 associated with the Tree Inventory Report.)

Due to the developed, urbanized character of the Project site and the surrounding vicinity, the analysis of biological resources is focused on potential impacts to the landscaped trees and shrubs at the Project site that could potentially serve as nesting and roosting sites for resident or migratory birds.

### 3.3.4 Project Impacts and Mitigation Measures

Impact Description (BIO-1)

a) *The project would conflict with any Federal, State, local policies or ordinances protecting biological resources, such as tree preservation policy/ordinance.*

**BIO-1** **The proposed redevelopment of the Beach Cities Health District (BCHD) campus – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in the removal of landscaped trees, shrubs, and other non-native vegetation that may provide nesting and roosting habitat. With the implementation of pre-construction nesting bird surveys, if necessary, and new landscaping, the proposed Project would not substantially interfere with resident or migratory birds. Impacts would be *less than significant with mitigation*.**

The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would redevelop the existing campus, which is located in a developed, urbanized area and is surrounded on all sides by residential and commercial development as well as heavily trafficked, arterial roadways. However, as described in Section

3.3.1, *Existing Setting*, landscaped trees, shrubs, and other non-native vegetation on the existing campus could provide suitable nesting and roosting opportunities for resident and migratory bird species afforded protection under the MBTA and/or California Fish and Game Code. For example, the nesting bird survey conducted in May 2019 found one active Allen's hummingbird nest (Hamilton Biological, Inc. 2019b).

The Tree Inventory Report prepared by Carlberg Associates (2019) concluded that 219 of the 228 of the landscaped trees located on the Project site are in good condition. These trees would be preserved in place where feasible. However, redevelopment of the Project site would require the direct removal of approximately half of the existing landscaped trees as well as a number of shrubs and other non-native ground cover. Additionally, adjacent vegetation, not proposed for removal, could be indirectly impacted by intrusion into their root zone.

Construction under the Phase 1 preliminary site development plan would require the removal of approximately 20 landscaped trees along Flagler Lane (north of Towers Street) and approximately 60 trees along the northern perimeter of the campus to provide space for the proposed footprint of the Residential Care for the Elderly (RCFE) Building. (The removal of trees within the City of Torrance right-of-way would require issuance of a permit from the Public Works Direct pursuant to TMC 75.1.5[a].) Additionally, construction under Phase 1 would require removal of an additional 20 landscaped trees along Diamond Street to provide space for the SCE Substation Yard. Similarly, while a site development plan has not yet been selected for Phase 2, the development program would also require the removal of additional landscaped trees and shrubs within the interior portions of the existing campus.

In addition to direct removal and indirect impacts to landscaped trees and shrubs, the proposed construction activities would result in a temporary increase in exterior noise that could also have an indirect impact on wildlife potentially occupying the Project site and the surrounding vicinity. However, the implementation of Mitigation Measure (MM) BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged (i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed

Project would not adversely impact any resident or migratory birds and this impact would be *less than significant with mitigation*.

The proposed landscaping plan would replace this vegetation with new vegetation that meets the landscaping regulations provided in RBMC Section 10-~~5~~2.1900. Additionally, the proposed tree removal and the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane (refer to Section 3.3.2, *Regulatory Setting*). The proposed landscaping – including large landscaped trees – would provide enhanced roosting or nesting habitat for resident and migratory birds. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and/or California Fish and Game Code would be *less than significant*.

Mitigation Measure (MM)

***MM BIO-1*** ***Pre-Construction Nesting Bird Surveys.*** *To prevent impacts to nesting or roosting birds through loss or damage of mature trees, the Beach Cities Health District (BCHD) shall comply with the following:*

- *Where suitable vegetation and structures for nesting birds occur within 500 feet of construction activities, all phases of construction shall avoid the general nesting season (i.e., between February 15 and August 31) to the maximum extent practicable.*
- *If the nesting season cannot be avoided, a qualified biologist shall be retained to conduct a pre-construction survey for nesting birds. The survey shall be conducted within 72 hours prior to commencement of vegetation removal.*
- *If any nesting birds are present within or immediately adjacent to the construction area, the following shall be required: A qualified biologist shall be retained by BCHD to flag and demarcate the location of all nesting birds and monitor construction activities. Temporary avoidance of active nests, including the enforcement of an avoidance buffer determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.*
- *If Federal or State protected species are observed during the site survey, consultation shall be completed with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to determine if work shall commence or proceed during the breeding season; and, if work may proceed, what specific measures shall be taken to ensure protected bird species are not affected.*

Residual Impacts

With implementation of the recommended MM BIO-1 and compliance with Federal, State, and local regulations, impacts on biological resources – including resident and migratory birds provided with protection under the MBTA and/or California Fish and Game Code – would be reduced to *less than significant.*

Cumulative Impacts

A cumulative impact to biological resources would occur if the impacts associated with the proposed Project, when combined with other pending, approved, and recently completed projects within Redondo Beach, Torrance, and the other neighboring South Bay communities would result in significant loss of or damage to biological resources. However, the existing campus generally lacks intact native habitats. While construction during Phase 1 and Phase 2 of the proposed Project would remove landscaped vegetation, this landscaped vegetation would be replaced under the proposed landscaping plan. Additionally, the implementation of MM BIO-1 would avoid potential impacts to resident and migratory birds. Future projects in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach (refer to Section 3.0.2, *Cumulative Impacts*) would also be expected to remove and replace landscaped trees, shrubs, and other non-native ground cover. However, as with the proposed Project, these projects would be required to comply with Federal and State regulations pertaining to the protection of migratory birds, including the MBTA and/or the California Fish and Game Code. Additionally, any cumulative projects with the potential to impact federally listed species, State-listed species, or sensitive natural communities would require an Incidental Take Permit from the USFWS and/or CDFW (refer to Section 3.3.3, *Regulatory Setting*), which would require the preparation of a Habitat Conservation Plan and associated mitigation to offset any such impacts. With the proposed landscape plan and the implementation of MM BIO-1 the proposed Project *would not substantially contribute to cumulatively considerable impacts*.

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## 3.4 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Cultural resources are defined by the California Environmental Quality Act (CEQA) as historic-period buildings, structures, and objects as well as prehistoric or historic-period archaeological resources. Public Resources Code Section 21074(a)(1) and (2) defines tribal cultural resources as *"sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe"* that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR) or included in a local register of historic resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence.

This analysis describes the existing cultural setting within the vicinity of the Beach Cities Health District (BCHD) campus and discusses known cultural resources on the Project site. This section then assesses the potential effects associated with the redevelopment of the BCHD campus under the proposed BCHD Healthy Living Campus Master Plan (Project) on cultural resources and tribal cultural resources.

This analysis is based on the Historic Resources Assessment prepared by LSA (2018) and peer reviewed by Wood Environment & Infrastructure Solutions, Inc. (Wood) senior architectural historian. This analysis is also based on the findings of an archaeological literature and records search prepared by Wood archaeologists as well as the information from the Redondo Beach ~~Historic~~ Preservation Ordinance (Ord. No. 2554) (1989), Historic Resources Surveys conducted by the City of Redondo Beach (1986 and 1996), Torrance General Plan Community Resources Element (2010), and Torrance Historic Preservation Ordinance (Ord. No. 3822) (2017).

### 3.4.1 Environmental Setting

Prehistory

There is evidence for human occupation of mainland Southern California dating back 10,500 or more years. Based on the small number of sites dated to this period, population densities along the coast may have been low initially. However, many prehistoric sites may have been lost, inundated, or deeply buried as a result of rising sea levels, erosion, aggradation (i.e., accumulation of sediments), and other natural forces.

Prehistoric human occupation and cultures within coastal Southern California evolved significantly over more than 10,000 years based on changes in climate, food availability, technological innovations, and utilization and changes in population densities and cultural characteristics. Although prehistoric remains within the region could be from any of the various past cultural epochs,

they would most likely represent past occupation by the Gabrieleño/Tongva or other Takic people. The Gabrieleño/Tongva occupied territory that included the Los Angeles Basin south to parts of Orange County and north to Topanga Canyon and the southern Channel Islands. The total Gabrieleño/Tongva territory covered more than 1,500 square miles and included the watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers and the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 villages with populations that ranged from approximately 50 to 150 individuals. The fully developed Gabrieleño/Tongva culture was a socially and economically complex hunting and gathering group, very advanced in their culture, social organization, religious beliefs and art and material object production. The tribe was known for its artisanship in the form of pipes, ornaments, cooking implements, inlay work, and basketry. It is believed their economic system exchanged goods and managed food reserves (i.e., storage and processing), which allowed them to maintain permanent year-round villages. The Gabrieleño/Tongva are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber 1925). Gabrieleño/Tongva populations and culture underwent dramatic changes following European contact. Introduced diseases weakened and killed large numbers of native peoples, and most villages were abandoned by 1810. Those Gabrieleño/Tongva that survived built the Spanish Missions and the Mexican and American ranches that followed.

Due to subsequent urban development beginning in the late nineteenth century and early twentieth century, the full extent and density of Gabrieleño/Tongva occupation of the South Bay is difficult to accurately characterize. However, based on the records searches for the proposed Project conducted through the South Central Coastal Information Center (SCCIC) at California State University, Fullerton (see Appendix D), no prehistoric sites or evidence of settlement have previously been recorded within the immediate vicinity of the Project site. Further, no prehistoric or historic-period archaeological resources have been previously identified on the Project site.

History

*Redondo Beach and Torrance*

Initial European contact with the Gabrieliño began in 1542, followed by more intensive exploration in 1769, when Spanish explorer, Gaspar de Portola, passed through Gabrieliño territory. In 1771, Mission San Gabriel was established approximately 23 miles northeast of the Project site and Mission San Fernando Rey de España, in 1797, approximately 30 miles north of the Project site. By the early 1800's, the majority of the surviving Gabrieliños had entered the mission system at one of these locations. In 1781, El Pueblo de La Reina de Los Angeles, which would later become the City of Los Angeles in the twentieth century, was established approximately 16 miles northeast of the Project site as a civilian settlement made up of families of African, Native American, and Spanish

descent. As the pueblo prospered and grew, it ushered in the Rancho era as thousands of acres of surrounding lands were granted to individuals as ranchos or farmsteads by the Spanish crown, and later the Mexican government, as repayment for the service the individual contributed.

Redondo Beach includes portions of three different ranchos: San Pedro, Los Palos Verdes, and Sausal Redondo. San Pedro, the largest and oldest of the three ranchos, was bounded on the east by the San Gabriel River, on the south and west by the Pacific Ocean, and on the north by Redondo Bay. Its boundaries include most of the modern-day Redondo Beach, Torrance, Gardena, and Compton (Cleland 1951). Early economic development in the region started with the Pacific Salt Works along Redondo Bay which succumbed to local competition following the arrival of the Southern Pacific Railroad in the mid-1870s. In 1892, Redondo Beach was incorporated and, by the early 1900s, thrived as a port city and shipping point for lumber and oil.

In 1911, Jared Sidney Torrance, a Pasadena real estate promoter, purchased approximately 3,000 acres of the Rancho San Pedro with the intention of creating a new city that incorporated design elements of the garden city movement of the late nineteenth century (City of Torrance 2010). To accomplish this, Jared Torrance hired the Olmsted Brothers, Frederick Law Olmsted Jr. and Charles Olmsted, of Brookline, Massachusetts, sons of Frederick Law Olmsted, a landscape architect whose work included Central Park in New York City and the original Stanford University campus. Groundbreaking for the model city commenced in 1912 with the renowned Irving Gill as the chief architect (City of Torrance 2010).

The 1920s marked the expansion of commercial and residential development in the area near Redondo Beach and Torrance. The introduction of the automobile supported new commercial developments such as gasoline stations and restaurants. Single-family farms were slowly being replaced with housing tracts. As with several other cities in California, World War II and post-World War II led to booms in residential and commercial development. New families moved to the cities during World War II as employment increased at the defense plants located in the area. Following World War II, veterans returned from the war and faced a shortage of rental properties. As a result of this shortage, veterans purchased vacant lots to build future homes. This accelerated growth led to a demand for a more urban amenities such as shopping centers, civic institutions, and medical facilities increased. The cities continued to grow and support industrial, residential, tourist, and commercial uses.

*Project Site*

*The former South Bay Hospital was originally constructed in 1958. The 150-bed, four-story hospital opened in early August 1960 after 27 months of construction.*

*Construction of a new hospital wing began in 1968, expanding the hospital to 203 beds.*

The increased demand for urban medical facilities and services following the post-World War II economic and population boom was especially escalated in previously rural areas. To accommodate this need, in 1946, following a speech by President Truman outlining five goals to improve national health, Congress passed the Hospital Survey and Construction Act which provided Federal funding to support construction of hospitals and clinics in underserved communities. In California, the Local Hospital District Law (Local Health Care District Law) was passed in 1945 and authorized the formation of hospital districts for the purposes of allowing maintenance of local hospitals in underserved counties with small populations. In 1950, a report prepared for the medical division of the Citizens' Emergency Corps found that Los Angeles area hospitals were inadequate to service existing needs and were not prepared to provide needed services in the scenario of a major local disaster, thus prompting the creation of the South Bay Hospital District and the construction of the South Bay Hospital Building (LSA 2018). The hospital was expanded with an approximately 12,300-square-foot (-sf) addition on the south side of the building completed in 1970 (Gnerre 2015; LSA 2018). However, by the late 1970s, the hospital began to struggle financially as it tried to compete with nearby privately-owned competitors. By 1984, the 203-bed hospital was privatized due to economic concerns. In the mid-1990s, the South Bay Hospital District changed its name to the Beach Cities Health District. Today BCHD continues to own and operate the facility as an outpatient medical campus with a variety of tenant health care providers (LSA 2018).

Historic Architectural Resources

*"Historic architectural resources"* include standing buildings, structures, and objects of historic importance. When a significant concentration of such resources occurs within a defined geographic space, a historic district may be defined for the area.

Properties subject to review under CEQA include those meeting the criteria for listing in the NRHP, CRHR, National Register of Historic Places (NRHP), or designation under a local ordinance or identified in a historic resources survey. Lead agencies under CEQA may also determine that an unlisted resource may be a historic resource as defined in Public Resources Code sections 5020.1(j) or 5024.1 (refer to CEQA Guidelines Section 15064.5[a][4]).

*Project Site*

Existing development on the Project site includes: the 5-story Beach Cities Health Center and attached single-story Maintenance Building located at 514 North Prospect Avenue; the 3-story Beach Cities Advanced Imaging Building located at 510 North Prospect Avenue; and the 3-story Providence Little Company of Mary Medical Institute Building located at 520 North Prospect Avenue. A 2-level subterranean parking garage, a 3-story parking structure, and various paved surface parking lots are also located on the Project site. The vacant Flagler Lot at the southwest corner of Flagler Lane and Beryl Street is undeveloped and characterized by patches of ruderal, weedy vegetation.

*The former South Bay Hospital's south- and west-facing elevations include a fourth story balcony addition and replaced front canopy, giving the building a modern aesthetic.*

The Beach Cities Health Center and the attached Maintenance Building, both of which are located at 514 North Prospect Avenue, are historic-period buildings that were constructed in 1960 and therefore meet the 50-year threshold for consideration as potential historic resources for the purposes of Federal, State, and local regulations and policies.

The former South Bay Hospital is designed in the International style, featuring a multi-level flat roof and unadorned, smooth, white exterior walls occasionally punctuated by horizontal bands of metal framed windows. Such features are common of the minimalist International style, best

characterized by its lack of decorative elements, instead incorporating the following design features:

*A modern, one-story addition has been added to a 1-story bay on the east side of the east stairwell as seen from the south and east.*

- Simple geometric forms, often rectilinear;
- Balance and regularity, but not necessarily symmetry;
- Reinforced concrete and steel construction with a non-structural skin;
- Unadorned, smooth wall surfaces typically of glass, steel, or stucco painted white;
- Complete absence of ornamentation and decoration;
- Often cantilevered upper floor or balcony;
- Flat roof without a ledge or eaves;
- Large areas of glass; and
- Metal window frames set flush with the exterior walls, often in horizontal bands as its distinguishing features.

Originating in Bauhaus interdisciplinary design school in Germany and migrating to the U.S. with German architects who relocated during the Depression Era, the International style garnered popularity in the post-World War II years and typically appeared in large, non-residential projects.

The former South Bay Hospital was designed by the well-known architectural firm, Walker, Kalionzes and Klingerman and built by notable builders M.J. Braock and Sons and R.J. Daum Construction Company. Kalionzes is best known as the principal architect for the 1952 Byzantine-style Saint Sophia Greek Orthodox Cathedral, which is a designated Los Angeles Historic-Cultural Monument (LSA 2018).

Numerous alterations and additions were made to the hospital from 1962 through 2009. The vast majority of these were for interior alterations, but permits for exterior alterations and/or additions were issued as well in 1963, 1968, 1976, 1979, and 2007. These alterations included the following:

- 4-story balcony addition on the west elevation;
- Expanded, 1-story lobby area on the south elevation;
- Replacement of an original folded plate canopy with an arched canopy supported by four round columns over the entry walkway;

- Nondescript 1-story addition on the northwest corner of the building; and
- 1-story addition to a 1-story bay on the east side of the east stairwell.

LSA (2018) evaluated the Beach Cities Health Center and the attached Maintenance Building for historic architectural significance using the criteria for listing in the CRHR and the criteria for designation as a Redondo Beach Landmark (see Appendix D). The findings of this evaluation are summarized below:

*The west elevation of the original 1960 building retains a high degree of integrity and features smooth, white wall surfaces and minimalist designs characteristic of the International style.*

Under Criteria 1/A, the former South Bay Hospital is associated with the post-WW II population boom and the resulting demand for housing and related amenities including medical facilities. It is associated with at least two pieces of important legislation, the Federal Hospital Survey and Construction Act (Hill-Burton Act) and the State Local Hospital District Law (The Local Health Care District Law). The Federal law provided funding for construction of new medical facilities, and the State law established regulations for the formation of district hospitals. Numerous communities in California took advantage of these, forming hospital districts and building new or improving existing healthcare facilities. The South Bay Hospital District was not exceptional in this regard. In addition, while the building still houses medical facilities, it is no longer a hospital and does not provide emergency room services or overnight care. Alterations to accommodate these new uses have further compromised its ability to convey an association with its origins as a district hospital.

Under Criteria 2/B, although a number of people who were active in the local community were associated with the development and operation of the former South Bay Hospital District and the former South Bay Hospital, none appears to have derived any historic significance specifically from their association with this building.

Under Criteria 3/C/D, the former South Bay Hospital was originally designed in the International style and retains many of the character-defining features of that style. However, 1-story additions to the façade (south elevation), west elevation, and east elevation have compromised the integrity of design, materials, and workmanship. Modern construction elsewhere on the property has

compromised the integrity of setting and feeling, and because the building is no longer used for its original purpose, integrity of association has also been compromised to a degree. The building is associated with prominent architects and builders. However, this building does not represent any innovations in design or construction or utilize unique materials. Additionally, the architects appear to have worked in the prevailing styles of the time, and there is no indication that this building was ever featured for its design in any publication or that it ever won any design awards. M.J. Brock and Sons is no longer in business, but was best known for residential projects. Daum Construction Company is still in business, but does not cite the former South Bay Hospital as one of its representative projects.

Criterion 4 is normally associated with archaeological resources. The former hospital building was constructed in 1960 using common methods and materials and does not have the potential to provide any information important to the prehistory or history of the local area, California, or the Nation.

With regard to Local Criterion E, the former South Bay Hospital does not have a unique location or singular physical characteristic that represents an established and familiar visual feature or landmark of a neighborhood, community, or city.

For these reasons, the building does not meet the criteria for listing in the CRHR or the City of Redondo Beach ~~Historic~~Preservation Ordinance (Ord. No. 2554). Further, the building is not part of a designated historic district (LSA 2018).

The two medical office buildings (510 and 520 North Prospect Avenue) were added to the campus in 1976 and 1989, respectively and do not meet the 50-year threshold generally required for consideration as potential historic resources under the CRHR (California Code of Regulations [CCR] Section 4852[d][2]). Similarly, given their age, these buildings are not eligible for consideration as a Redondo Beach Landmark, a building must be at least 50 years. There is an exception for buildings that are at least 30 years if the Redondo Beach Preservation Commission determines that the resource is very exceptional. However, for all the reasons described for the former South Bay Hospital Building these two medical office buildings have not been ~~determined by the Redondo Beach Preservation Commission to be very exceptional~~identified in the City's Historic Resource Survey and do not meet the criteria outlined in the City of Redondo Preservation Ordinance (Ord. No. 2554) for designation as a Redondo Beach Landmark.

*Historic Resources within the Project Vicinity*

As previously described, Wood senior archaeologists conducted a literature and records search through the SCCIC at California State University, Fullerton to identify known historic or

archaeological resources and prior studies within 0.5 miles of the Project site. Sources consulted during the SCCIC records search include: NRHP, CRHR, California Historical Landmarks, California Points of Historical Interest, and California Inventory of Historic Resources. The literature and records search indicated that six previous investigations have been undertaken at the Project site, and a further 14 have been undertaken within a 0.5-mile radius of the Project site. No previously recorded resources are known within the Project site, but four historic-period resources are documented within the 0.5-mile radius, only one of which is listed in the NRHP, CRHR, or a local register.

- *P-19-177669/Redondo Beach Original Townsite Historic District.* This resource is an NRHP, CRHR, and locally-listed historic district containing 48 contributing elements and 19 associated historic properties comprising a neighborhood built just outside of the original center of Redondo Beach.

There are also three historic-period resources identified in the area as part of the Southern California Edison (SCE) electrical grid, which are not eligible for listing in the NRHP, CRHR, or the local register. These resources include:

- *P-19-189960.* This resource is a steel lattice electrical tower, part of the SCE electrical grid. The resource was evaluated for NRHP-, CRHR-, and local register-eligibility in 2011, and determined to be ineligible for listing.
- *P-19-190298.* This resource is also a steel lattice electrical tower, also part of the SCE electrical grid. The resource was evaluated for NRHP-, CRHR-, and local register-eligibility in 2012, and determined to be ineligible for listing.
- *P-19-190323.* This resource is also a steel lattice electrical tower, also part of the SCE electrical grid. The resource was evaluated for NRHP-, CRHR-, and local register-eligibility in 2013, and determined to be ineligible for listing.

The City of Redondo Beach also maintains a Historic Resources Register which is a combined list of all properties in Redondo Beach listed in the NRHP or CRHR and/or designated as local landmarks. According to the Redondo Beach Historic Resources Register, four buildings located within the vicinity of the Project site have been designated for protection under the City of Redondo Beach ~~Historic~~Preservation Ordinance (Ord. No. 2554), one of which is also listed in the NRHP and as a contributor to the Original Townsite Historic District. The listed resources are shown in Table 3.4-1. No historic resources recorded in the Torrance Historic Resource Survey (1979) occur in the immediate vicinity of the Project site.

**Table 3.4-1. Historic Architectural Resources ~~with~~in Redondo Beach within a 0.5-mile radius of the Project Site**

| Name | Address | Proximity to Project Site | Status |
|---|---|---|---|
| Morrell House at Dominguez Park | 298 Flagler Lane | 650 feet north | Local Landmark |
| Queen Anne House at Dominguez Park | 302 Flagler Lane | 750 feet north | Local Landmark |
| ~~Hibbard House/~~ Original Townsite Historic District | ~~328~~ N. Gertruda Avenue N. Guadalupe Avenue Carnelian Street | 0.43 miles southwest | Listed in NRHP |
| Gertruda Avenue Historic District | N. Gertruda Avenue | 0.5 miles southwest | Listed in NRHP |
| - | 820 Beryl Street | 0.23 miles southwest | Locally Significant* |

Note: The City of Torrance has surveyed hundreds of historic resources within its Olmsted Tract (also referred to as the Torrance Tract or Old Torrance Tract), an area of the City originally planned by Fredrick Law Olmsted Jr. and includes a number of buildings designed by the noted Southern California Architect Irving Gill (Page and Turnbull 2018). The Olmsted Tract and its contents are located in the eastern area of the City and not in proximity to the proposed Project site.
*The property located at 820 Beryl Street was determined to be a potentially historic resource within the City of Redondo Beach's Historic Resource Survey; however, this property has not been designated as a Local Landmark.
Sources: City of Redondo Beach 2019a; 2019b.

*The Morrell House is a designated Redondo Beach Landmark that was ~~related~~ relocated to Dominguez Park from its original location on Catalina Avenue, just north of Diamond Street.*

The Morrell House, located at 298 Flagler Lane, is a designated Redondo Beach Landmark characterized by a combination of Queen Anne and Craftsman detailing. The Morrell House was originally constructed in 1906 on Catalina Avenue just north of Diamond Street. However, following the purchase of this property for redevelopment as condominiums in the late 1980s, the developer donated the building, and the City of Redondo Beach allocated a new location in Dominquez Park, creating Heritage Court. The building is located within Dominguez Park between 190th Street and Beryl Street, approximately 650 feet north from the Project site. The Morrell House faces west with a direct view of an adjacent residential apartment complex. The view to the north of the building includes the Redondo Beach Historical Museum parking lot and the Queen Anne House, another designated Redondo Beach Landmark located in the courtyard (refer to Table 3.4-1). The Morrell House is located within a developed urban area of Redondo Beach predominantly surrounded by single-family residences.

The Queen Anne House, located at 302 Flagler Lane, is a designated Redondo Beach Landmark. As with the Morrell House, the Queen Anne House was also relocated to the site in the late 1980s in an effort to form Heritage Court. The building is located in Heritage Court within Dominguez Park between 190th Street and Beryl Street, approximately 750 feet north from the Project site. The Queen Anne House faces west with a view of the Heritage Courtyard and adjacent residential apartments across the street. The Queen Anne House is immediately surrounded by the Dominguez Park and parking lots to the north, east and south, and medium-density multi-family residential development to the west.

*The Queen Anne House is a designated Redondo Beach Landmark and serves as the Redondo Beach Historical Museum.*

The Hibbard House, located at 328 North Gertruda Avenue, is listed in the NRHP and part of the Original Townsite Historic District. This neighborhood was largely built between 1906 and 1914, with houses in a mix of styles typical of the period (i.e., Craftsman and Colonial Revival). The district was added to the NRHP in June of 1988. The Hibbard House is located in a residential neighborhood approximately 0.43 miles southwest of the Project site, facing west towards single-family and low-density multi-family residences.

*The Hibbard House, constructed in 1910, is listed on the National Register of Historic Places.*

The craftsman home located at 820 Beryl Street was designated as a historically significant building by the City of Redondo Beach since its listing in the Historic Resource Survey conducted by the City of Redondo Beach in 1986 (City of Redondo Beach 2019b). The Historic Resource Survey used a ranking system of *"A," "B," "C," "D,"* with *"A"* being most significant. The structure at 820 Beryl Street is ranked as an *"A."* This property is surrounded by single-family and low-density multi-family residential homes and Beryl Heights Elementary School to the east.

Archaeological Resources

Archaeological resources both represent and document activities, accomplishments, and traditions of past cultures, and link current and former inhabitants of an area. Archaeological resources may date from the historic or prehistoric period, and include deposits of physical remains of the past (e.g., artifacts, manufacturing debris, dietary refuse, and the soils in which they are contained) or areas where prehistoric or historic activity measurably altered the earth.

As previously described, the literature and record search results indicate no archaeological resources have been recorded at the Project site. A lack of known archaeological sites is not a reliable indicator of archaeological sensitivity. In developed urban settings, the original ground surface is typically not available for inspection and prehistoric and historic archaeological deposits may be preserved at depth under existing buildings and structures.

Native American Outreach and Tribal Cultural Resources

A search of the Native American Heritage Commission's (NAHC's) Sacred Lands File was requested to determine the presence of any Native American cultural resources within a 0.5-mile buffer extending from the boundaries of the Project site. The NAHC indicated that the results of the Sacred Lands File search were negative (see Appendix D). However, the NAHC identified five Native American tribes and/or individuals that would potentially have specific knowledge as to whether cultural resources are identified in the Area of Potential Effect:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians-Kizh Nation;
- Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians;
- Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council;
- Sandonne Goad, Chairperson, Gabrielino/Tongva Nation; and
- Charles Alvarez, Gabrielino-Tongva Tribe.

As part of the tribal consultation process required by Assembly Bill (AB) 52, BCHD sent a request for tribal consultation to the list of tribes provided by the NAHC. The letters, which were sent on July 29, 2019, described the proposed Project and location and requested input on the proposed Project from these individuals and organizations. Of the five tribes/individuals contacted, one tribe, the Gabrieleño Band of Mission Indians – Kizh Nation, responded with a request for formal consultation. A telephone call held on September 16, 2020 between Mr. Andrew Salas, Tribal Chairperson, Matthew Teutimez, Tribal Biologist, and Ed Almanza, representative of BCHD. Tribal representatives were aware of the proposed Project and its location from BCHD's earlier correspondence, and advised that the potential exists for the proposed Project to impact tribal cultural resources (see Impact CUL-4). Mr. Salas requested that BCHD provide for tribal

monitoring by a representative of the Gabrieleño Band of Mission Indians – Kizh Nation during all ground disturbances associated with the proposed Project. Mr. Salas, on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation, also requested that specific measures be implemented in the event of unanticipated discovery of tribal cultural resources, archaeological resources, human remains, and/or associated funerary objects.

### 3.4.2 Regulatory Setting

Federal Laws and Regulations

*National Historic Preservation Act*

The National Register of Historic Places was established by the National Historic Preservation Act (NHPA) to help identify and protect properties that are significant cultural resources at the Federal, State, and/or local levels. As previously described, four criteria have been established to determine if a resource is significant to American history, architecture, archaeology, engineering, or culture and should be listed in the NRHP. These criteria include:

1. It is associated with events that have made a significant contribution to the broad patterns of our history;
2. It is associated with the lives of persons significant in our past;
3. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;
4. It yields, or may be likely to yield, information important in prehistory or history.[1]

Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years in age must meet one or more of the above criteria to be eligible for listing in the NRHP. However, the NRHP does not prohibit the consideration of properties less than 50 years in age whose exceptional contribution to the development of U.S. history, architecture, archaeology, engineering, or culture can be clearly demonstrated under NRHP criteria.

In addition to meeting the Criteria for Evaluation, a property must have integrity, which is defined as *"the ability of a property to convey its significance."* According to NRHP Bulletin 15, the NRHP recognizes seven aspects or qualities that, in various combinations, define integrity. To

[1] *Guidelines for Completing National Register Forms*, National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the NRHP.

retain historic integrity a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling and association.

In assessing a property's integrity, the NRHP criteria recognize that properties change over time; therefore, it is not necessary for a property to retain all its historic physical features or characteristics. The property must, however, retain the essential physical features that enable it to convey its historic identity.

State Laws and Regulations

The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA at the State level. The OHP also carries out the duties as set forth in the Public Resources Code and maintains the CRHR as well as the California Historic Resources Inventory. The State Historic Preservation Officer is an appointed official who implements historic preservation programs within the State's jurisdictions. CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historic resources.

*California Register of Historical Resources*

The CRHR is *"an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the Sate and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."* CEQA Guidelines Section 15064.5(a)(3) states that a resource shall be considered by the lead agency to be *"historically significant"* if the resource meets the criteria for listing on the CRHR (Public Resources Code Section 5024.1; CCR Section 4852).

A historic resource eligible for listing in the CRHR must meet one or more of the criteria of significance and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historic resources that have been rehabilitated or restored may be evaluated for listing.

The CRHR automatically includes *"all properties formally determined eligible for, or listed in, the National Register of Historic Places,"* and certain specifics, and California Points of Historical Interests that have been evaluated and recommended for inclusion on the CRHR. Unless a resource listed in a survey has been demolished, lost substantial integrity, or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the

resource to be potentially eligible for the CRHR. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historic resources, or identified in an historic resources survey, does not preclude a lead agency from determining that the resource may be an historic resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

*California Environmental Quality Act*

CEQA includes regulations that address historic resources. As described in Public Resources Code 21084.1, *"historic resources"* are defined according to Public Resources Code Section 5020.1(k) as *"any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California"* (OHP 2005). Resources included in a local register of historic resources (pursuant to Public Resources Code Section 5020.1[k]), or identified as significant in an historic resources survey (meeting the criteria in Public Resources Code Section 5024.1[g]), are also considered *"historic resources"* for purposes of CEQA. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historic resources, or identified in a historic resources survey, does not preclude a lead agency from determining that the resource may be a historic resource as defined in Public Resources Code Sections 5020.1(j) and 5024.1.

*Assembly Bill 52*

AB 52 amended CEQA to require that lead agencies notify and consult in good faith with California Native American tribes requesting consultation regarding projects that may impact tribal cultural resources. Tribal cultural resources may include site, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe. Under AB 52, a project with a potential to impact tribal cultural resources such that it would cause a substantial adverse change constitutes a significant effect on the environment unless mitigation reduces such effects to a less than significant level.

*State Laws and Regulations Governing Human Remains*

The disposition of human remains is governed by California Health and Safety Code Section 7050.5 and Public Resources Code Sections 5097.94 and 5097.98, and may fall within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified immediately and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for

contacting the NAHC within 24 hours. The NAHC, pursuant to Public Resources Code Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native American(s) so they can inspect the burial site and make recommendations for treatment or disposal. CEQA Guidelines Section 15064.5 also assigns special importance to human remains and specifies procedures to be used when Native American human remains are discovered.

City of Redondo Beach Local Policies and Regulations

*Redondo Beach ~~Historic~~ Preservation Ordinance*

The Redondo Beach ~~Historic~~Preservation Ordinance (Ord. No. 2554) in Redondo Beach Municipal Code (RBMC) Title 10 Chapter 4 is intended to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of historic resources such as buildings and structures, sites and places within the City that reflect special elements of the City's architectural, artistic, cultural, historic, political, and social heritage (City of Redondo Beach 1989).

A historic resource may be designated a landmark, and an area may be designated an historic district if it meets one or more of the following criteria:

1. It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, or architectural history; or
2. It is identified with persons or events significant in local, State, or national history; or
3. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
4. It is representative of the notable work of a builder, designer, or architect; or
5. Its unique location or singular physical characteristic(s) represents an established and familiar visual feature or landmark of a neighborhood, community, or the City.

In order to be eligible for consideration as a landmark, a historic resource must be at least 50 years old; with the exception that an historic resource of at least 30 years of age may be eligible if the City's Preservation Commission determines that the resource is very exceptional, or that it is threatened by demolition, removal, relocation, or inappropriate alteration.

*Historic Resources Survey*

The City of Redondo Beach has conducted two surveys in the development of its historic resource list. A structure is considered a historic resource if it is designated as a national or State landmark

or meets the criteria described under the Redondo Beach ~~Historic~~Preservation Ordinance (Ord. No. 2554). The 1986 Historic Resource Survey includes the City's original townsite and adjacent areas to the south. Included are structures, sites and artifacts related to the history of the City from the origins of the community to and including 1946. The survey identified approximately 1,400 buildings pre-dating 1946 and with the original townsite, the Clifton-by-the-Sea area, and Clifton Heights area.

The 1996 Historic Resources Survey was designed to supplement the 1986 investigations and expand the surveyed area. Areas north of 190th Street/Anita Avenue (North Redondo), areas located east of the 1986 study, and some isolated areas ~~location~~located in the southern portion of the City were included. Not including addresses identified in the 1986 Survey, the 1996 Survey team found 1,565 addresses to be located within the City and pre-dating 1950, none of which are located on the Project site.

City of Torrance Local Policies and Regulations

*Torrance General Plan Community Resource Element*

The Torrance General Plan Community Resource Element states that the goal of the historic preservation policies are to demonstrate respect and pride for the foundations of the City through the establishment of a long-range vision for the protection of historic resources in the City and to goals and policies to achieve that vision (City of Torrance 2010). The Community Resource Element is organized into objectives, and policies. Some of the policies include identifying and evaluating local structures and sites of historic interest, encouraging the preservation of public and private buildings which are of local, historic, or cultural importance balancing historic preservation goals with the interests of private property owners, the establishment of a historic policy and programs for recognition of historic assets within the City.

*Torrance Historic Preservation Ordinance*

The Torrance Historic Preservation Ordinance (Ord. No. 3822) establishes the Torrance Register of Historic Resources and allows the designation of a property or area by the Historic Preservation Commission if eligible (City of Torrance 2017). The primary purpose of the Historic Preservation Ordinance is to promote the public health, safety, and general welfare by providing for the identification, designation, protection, enhancement, perpetuation and use of historic resources that reflect themes important in the City's heritage.

To be eligible for designation as a landmark or historic district in the Torrance Register of Historic Resources, a property or area shall meet one or more of the following requirements below:

1. Listed in the CRHR and NRHP, if the property has not undergone substantial exterior alteration since its designation and retains integrity;
2. Identified as eligible in a survey adopted by the Torrance City Council;
3. Determined by a qualified historic preservation professional through a historic assessment to meet at least one (1) or more of the criteria outlined in Torrance Municipal Code (TMC) Section 91.50.050 or 91.50.060.

*Torrance Municipal Code*

TMC Section 91.50.050 lists criteria for a property to be designated as a historic landmark. These criteria consider the structure's association with historic events, persons, or renowned architects, artistic or aesthetic value, potential to yield information about the prehistory or history of the City, state, or nation. The criteria also consider if the property embodies the distinct characteristic of a type, period, or style, or method of construction, or if property is among the last, best remaining examples of an architectural or historic type of specimen.

### 3.4.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance for cultural resources are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, the proposed Project would be considered to have a significant adverse impact on cultural resources if:

a) The project would cause a substantial adverse change in the significance of an historic resource as defined in CEQA Guidelines Section 15064.5;
b) The project would cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5; and/or
c) The project would disturb any human remains, including those interred outside of formal cemeteries.

Implementation of the proposed Project would be considered to have a significant adverse impact on tribal cultural resources if it would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape,

sacred place, or object with cultural value to a California Native American tribe, and that is at least one of the following:

i. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

*Historic Resources*

Analysis of impacts to historic architectural resources requires that a lead agency first determine whether a building, structure, object, or feature is a historic resource as defined in CEQA Guidelines Section 15064.5. If the lead agency determines a building, structure, object, or feature is determined to be a historic resource, its significance may be considered to be materially impaired by a project through demolition or alteration. The resource may also be materially impaired by demolition or incompatible new construction that alters the setting of the resource, thereby diminishing its integrity and significance.

According to the CEQA Guidelines Section 15064.5(b), a project with an effect that may cause a substantial adverse change in the significance of a historic resource may have a significant effect on the environment. A substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the historic resource (CEQA Guidelines Section 15064.5[b][1]). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historic resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historic resource that convey its historic significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historic resources pursuant to Public Resources Code Section 5020.1(k) or its identification in an historic resources survey meeting the requirements of Public Resources Code Section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes or materially alters in an adverse manner those physical characteristics of a historic resource that convey its historic significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Removal, demolition, or alteration of historic resources can directly impact their significance by destroying the historic fabric of an archaeological site, structure, or historic district. Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project vicinity, assessing the significance of the resources that may be affected, and determining the appropriate mitigation.

The maintenance, repair, stabilization, restoration, preservation, conservation, or reconstruction of a historic resource in a manner consistent with The Secretary of the Interior's Standards and Guidelines (Weeks and Grimmer 1995) generally will constitute mitigation of impacts to a less than significant level. Documentation of historic buildings and structures, including documentation to the standards of the Historic American Buildings Survey or Historic American Engineering Record, may reduce impacts but may not reduce them to less than significant levels.

*The Secretary of the Interior's Standards for the Treatment of Historic Properties* (36 Code of Federal Regulations [CFR] Part 68) defines four options for the treatment of historic buildings: 1) preservation; 2) rehabilitation; 3) restoration; and 4) reconstruction. These standards are not prescriptive but instead provide general guidelines and are intended to be flexible and adaptable to specific project conditions, including aspects of adaptive use, functionality, and accessibility. The goal is to balance continuity and change and retain historic building fabric to the maximum extent feasible. The National Park Service has compiled a series of bulletins to provide guidance on specific historic preservation topics.

*Archaeological Resources and Human Remains*

CEQA provides guidelines for mitigating impacts to archaeological resources in CEQA Guidelines Section 15126.4. According to the CEQA Guidelines, public agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered for a project involving such an archaeological site:

1. Preservation in place (i.e., avoidance) is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

2. Preservation in place may be accomplished by, but is not limited to, the following:

- Planning construction to avoid archaeological sites;
- Incorporation of sites within parks, greenspace, or other open space;
- Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site;
- Deeding the site into a permanent conservation easement.

3. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historic resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Information System. Archaeological sites known to contain human remains shall be treated in accordance with the provisions California Health and Safety Code Section 7050.5.

4. Data recovery shall not be required for a historic resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historic resource, provided that the determination is documented and that the studies are deposited with the California Historical Resources Information System.

*Tribal Cultural Resources*

CEQA provides recommendations for mitigating impacts to tribal cultural resources in Public Resources Code Section 21084.3. According to these recommendations, public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process provided for in Public Resources Code Section 21080.3.2, Section 21084.3 lists the following examples of mitigation measures that, if feasible, may be considered to avoid or minimize the significant adverse impacts:

1. Avoidance and preservation of the resources in place, including, but not limited to:

    a. Planning and construction to avoid the resource and protect the cultural and natural context; and
    b. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

2. Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

c. Protecting the cultural character and integrity of the resource;
d. Protecting the traditional use of the resource; and
e. Protecting the confidentiality of the resource.

3. Permanent conservation easements of other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

4. Protecting the resource.

Methodology

*Historic Resources*

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. Based on CEQA Guidelines Section 15064.5(b)(2) presented above, the proposed Project would have a significant impact on historic resources if it would demolish, destroy, relocate, or alter a historic resource or its setting such that its historic significance or integrity as a historic resource would be materially impaired, rendering it no longer eligible as a historic resource. The analysis of the potential impacts of the proposed Project on historic resources is based on a review of information and analysis available in several reports:

- Historic Resources Assessment prepared by LSA (2018);
- Peer Review of the Historic Resources Assessment prepared by Wood's architectural historian;
- Redondo Beach Historic Resources Survey (1986 and 1996); and
- Torrance General Plan Community Resources Element (2010).

The Historic Resources Assessment included a records search of the NRHP and its annual updates, determinations of eligibility for the NRHP and CRHR. The Redondo Beach Historic Resources Register and the Torrance Olmsted District Torrance California Survey of Historic Resources were also reviewed to identify any previously surveyed properties within the Project site and the surrounding vicinity. Site inspections were made to assess existing conditions and to describe the remaining historic integrity of the former South Bay Hospital Building and associated Maintenance Building as well as the outpatient medical office buildings and the other structures developed on the campus in the 1980s. Criteria of the NRHP and CRHR as well as the Redondo Beach ~~Historic~~Preservation Ordinance (Ord. No. 2554) and City of Torrance Historic Preservation Ordinance (Ord. No. 3822), were applied to evaluate these each of these resources.

*Archaeological Resources and Human Remains*

Investigation of potential archaeological resources at the Project site was conducted through an archaeological literature and records search at the SCCIC at California State University, Fullerton and consultation of the NRHP, CRHR, California Historical Landmarks, California Points of Historical Interest, and California Inventory of Historic Resources.

*Tribal Cultural Resources*

The impact analysis for tribal cultural resources is based on information provided during consultation with California Native American tribes that requested consultation pursuant to AB 52, the findings of the literature and records search, Project site-specific geologic and topographic conditions, and the footprint and depth of the subsurface excavation associated with the proposed Project.

### 3.4.4 Project Impacts and Mitigation Measures

Impact Description (CUL-1)

*a) The project would cause a substantial adverse change in the significance of an historic resource as defined in CEQA Guidelines Section 15064.5;*

**CUL-1 Redevelopment of the Beach Cities Health District (BCHD) campus would include the proposed demolition of Beach Cities Health Center and the attached Maintenance Building during Phase 1 as well as the demolition of the existing parking structure and potentially the Beach Cities Advanced Imaging Center during Phase 2. However, no historic architectural resources exist on the campus and the proposed redevelopment of the campus would not damage or result in a substantial change in the historic setting of historic architectural resources in the vicinity of the Project site. Therefore, impacts would be *less than significant*.**

The implementation of Phase 1 would begin with the removal of the northern surface parking lot and the construction of the Residential Care for the Elderly (RCFE) Building. The Beach Cities Health Center would remain in place for the duration of construction of the RCFE Building to allow some of BCHD's existing programs to continue. However, following the completion of the proposed construction activities, the existing uses would be relocated from the Beach Cities Health Center to the new RCFE Building and the Beach Cities Health Center and attached Maintenance Building would be demolished. The footprint of this building would be converted to a surface parking lot and open space within the interior portion of the campus. During Phase 2, the existing

parking structure and potentially the Beach Cities Advance Imaging Building would be demolished and redeveloped with a Wellness Pavilion, Aquatics Center, and Center for Health and Fitness (CHF) as well as a new parking structure.

As described in Section 3.4.1, *Environmental Setting*, the Historic Resources Assessment prepared for the campus by LSA (2018) identified the Beach Cities Health Center (former South Bay Hospital Building) and the attached Maintenance Building as historic-period structures that are more than 50 years old; however, it was determined that these buildings do not meet any of the criteria for listing as a historic resource in CRHR, or designation as a local landmark under the Redondo Beach ~~Historic~~Preservation Ordinance (Ord. No. 2554). The other existing structures on the campus – including the two outpatient medical office buildings and the existing parking structure – also do not meet any of these criteria. Further, the Project site is not listed in the Torrance Register of Historic Resources or located within the Torrance Tract Overlay Zone. Therefore, the demolition of the Beach Cities Health Center and attached Maintenance Building during Phase 1 as well as the existing parking structure and Beach Cities Advanced Imaging Building during Phase 2 would not result in a significant impact to historic architectural resources under the criteria set forth in CEQA Section 15064.5(b)(3).

As described in Table 3.4-1, the Morell House and Queen Anne House are located within the immediate vicinity of the Project site within Dominguez Park. These buildings have been previously determined to be Redondo Beach Landmarks in accordance with the criteria described in the Redondo Beach ~~Historic~~Preservation Ordinance (Ord. No. 2554) (refer to Section 3.4.2, *Regulatory Setting*). According to the Redondo Beach Historic Resources Survey, there are no other significant or potentially significant historic architectural resources in the immediate vicinity of the Project site.

Potential impacts to historic built resources can include physical damage or the loss of character defining features and alteration of the historic setting. As described in Section 3.11, *Noise*, redevelopment of the campus would not result in substantial ground-borne vibration that could physically damage either of the two nearby historic buildings (see Section 3.11, *Noise*). With regard to their historic setting, both the Morell House and Queen Anne House were relocated to their current location in Dominguez Park in the late 1980s. As such, these buildings have been previously removed from their original historic settings and context. Additionally, the area surrounding the current location of Morell House and Queen Anne House has already been substantially redeveloped over the years with the construction former South Bay Hospital, Redondo Village Shopping Center, and other surrounding uses including Dominguez Park, which was formerly a landfill that was operated from 1904 to 1967. As such, the existing surrounding

development does not contribute to the character-defining features that establish of the Morell House and Queen Anne House as Redondo Beach Landmarks.

Given that the proposed Project would not physically damage or substantially change the historic setting or context of any historic architectural resources, the potential impacts associated with Phase 1 and Phase 2 of the proposed Project would be *less than significant*.

Impact Description (CUL-2)

*b) The project would cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5; and/or*

**CUL-2 Ground disturbing activities associated with the proposed Project – particularly demolition of existing pavements and excavation of subterranean levels during Phase 1 and Phase 2 – could uncover previously unknown prehistoric or historic archaeological deposits that qualify as archeological resources as defined in California Environmental Quality Act (CEQA) Guidelines Section 15064.5. Damage or destruction of any such archaeological resources would be considered a potentially significant impact. However, this impact would be *less than significant with mitigation*.**

Under the proposed Project, major earthwork would involve demolition, grading, and excavation of the previously disturbed Project site. Phase 1 would begin with the demolition of approximately 100,000 sf of pavements include the existing northern surface parking lot and associated perimeter circulation road. Subsequent construction of the RCFE Building would begin with a 26-foot-deep excavation for the subterranean service area and loading dock. Similarly, Phase 2 would include a 26-foot-deep subterranean excavation for the proposed parking structure and other service areas. These excavations would occur in a 20,000-sf area at the corner of Flagler Lane and Beryl Street and an area of between 23,100 sf and 39,200 sf near the central area of the campus. Earth movement across the remainder of the Project site would include relatively minor grading to even the terrain in the central area of the campus.

The Project site has been extensively disturbed beginning with the construction of the former South Bay Hospital (and associated basement) in 1958 as well as the subsequent expansion in the 1960s. Thereafter, the Beach Cities Advanced Imaging Building, Providence Little Company of Mary Medical Institute Building, and the associated subterranean parking garage and parking structure were constructed in the 1980s, causing further soil disturbance on the Project site. Utilities including electrical lines, water lines, sewer lines, and storm drains have also been installed throughout the Project site to support these facilities. Based on the results of the literature and records search, no

archaeological resources were identified during any of these construction episodes. Consequently, given the extensive ground disturbance that has occurred previously, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources and the potential for the proposed Project improvements to impact previously unknown prehistoric or historic-period archaeological resources is considered to be low.

Nevertheless, with the implementation of MM CUL-1a and -1b ~~and~~ as well as MM CUL-2, agreed to during AB 52 consultation with the Gabrieleño Band of Mission Indians – Kizh Nation, any previously unknown buried archaeological resources inadvertently discovered during construction would be protected and curated, if encountered. Therefore, impacts associated with Phase 1 and Phase 2 of the proposed Project would be *less than significant with mitigation*.

Mitigation Measures (MM)

***MM CUL-1a*** ***Native American Monitoring.*** *Prior to the commencement of any ground disturbing activities at the Project site, the Beach Cities Health District (BCHD) shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. The Native American Monitor shall only be present on-site during the construction phases that involve ground-disturbing activities, defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, within the Project site. The Native American Monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Native American Monitor and Tribal Representatives have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.*

*Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (i.e., not less than the surrounding 100 feet) until the find can be assessed. All archaeological resources unearthed by ground disturbing activities shall be evaluated by the Native American Monitor. If the archaeological resources are Native American in origin, the Consulting Tribe shall retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.*

*If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the County coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5. Human remains and grave/burial goods shall be treated alike per Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (California Environmental Quality Act [CEQA] Guidelines Section 15064.5[f]).*

***MM CUL-1b*** ***~~Cultural Resources Monitoring Plan~~Archaeological Monitoring.*** *Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan shall be developed by a qualified archaeologist~~, with provisions for review and input by representatives of the Native American tribe(s) that consulted on the project pursuant to Assembly Bill (AB) 52~~. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist ~~and Native American tribal monitor~~ shall be required during ground disturbing activities ~~including (but not limited to) clearing/grubbing, excavations, grading, and trenching~~ during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist~~ and Native American tribal monitor~~. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary.*

***MM CUL-2*** ***Inadvertent Discoveries.*** *A qualified ~~professional~~ archaeologist ~~and approved Native American monitor~~ shall be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological ~~and/or tribal~~resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than ~~50~~ 100 feet from the find. ~~The qualified archaeologist and/or Native American monitor shall evaluate the significance of the discovery based on the Treatment Plan prior to resuming any activities that could impact the discovery. All tribal cultural resources unearthed by ground disturbing activities shall be evaluated by the Native American monitor. Any required testing or data recovery shall be directed by the qualified archaeologist and Native American monitor pursuant to the Treatment Plan.~~The treatment of the archaeological resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.*

Residual Impacts

With the implementation of MM CUL-1a and -1b ~~and~~ as well as MM CUL-2, the potential for impacts to archaeological resources would be *less than significant*. In the event of an unanticipated discovery there would be a clear Treatment Plan and any required testing or data recovery would be completed, as necessary.

Impact Description (CUL-3)

*c) The project would disturb any human remains, including those interred outside of formal cemeteries.*

**CUL-3 While unlikely, unknown, isolated Native American human remains could potentially be inadvertently uncovered during construction activities associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program. In the event of this occurrence, the Beach Cities Health District (BCHD) would immediately cease activity in the vicinity of the discovery and comply with existing regulations. Therefore, impacts would be *less than significant*.**

The nearest known cemetery to the Project site is the Pacific Crest Cemetery, located approximately 1.4 miles northeast of the Project site. As described in Impact CUL-2 above, the Project site has previously been disturbed during construction of the existing facilities at the campus. No human remains have been discovered during any of the construction episodes at the existing campus.

However, as described further in Impact CUL-4, during AB 52 consultation the Gabrieleño Band of Mission Indians – Kizh Nation described that the Project site is in an area known to have had a high level of tribal activity including trade routes. It is possible that the area within and around these trade routes contains isolated burials and cremations.

Although human remains have not been identified previously within the Project site or the surrounding vicinity, it is possible that human remains could be preserved at depth beneath the existing building foundations and adjacent surface parking lots. In the unlikely event that human remains are discovered during excavation or grading associated with Phase 1 or Phase 2 of the proposed Project, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall be halted. A qualified professional archaeologist shall inspect the remains and confirm that they are human and, if so, shall immediately notify the coroner in compliance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the coroner determines the remains are Native American, the coroner shall contact the NAHC. As provided in Public Resources Code Section 5097.98, the NAHC shall identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent would make recommendations for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

With compliance to existing requirements in California Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5, and Public Resources Code Section 5097.98, any impacts to human remains associated with Phase 1 and Phase 2 of the proposed Project would be *less than significant*.

Impact Description (CUL-4)

a) *Cause a substantial adverse change in the significance of a tribal cultural resource, defined in* Public Resources Code *Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is at least one of the following:*

   i. *Listed or eligible for listing in the CRHR, or in a local register of historic resources as defined in* Public Resources Code *Section 5020.1(k); or*

   ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in* Public Resources Code *Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.*

**CUL-4** **Potential tribal cultural resources, as defined in Public Resources Code Section 21074, may be inadvertently uncovered during excavation and grading associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program. Damage or destruction of such tribal cultural resources would be a potentially significant impact. However, impacts would be reduced to *less than significant with mitigation.***

As previously described, a search of the NAHC's Sacred Lands File was requested to determine the presence of any Native American cultural resources within a 0.5-mile buffer extending from the boundaries of the Project site. The NAHC indicated that the results of the Sacred Lands File search were negative. However, during AB 52 consultation, the Gabrieleño Band of Mission Indians – Kizh Nation advised that the Project site is an area of high cultural sensitivity because of the presence of traditional trade routes. Higher elevations, such as the site of the campus, may have served as look-out locations.

Maps shared by the tribe illustrate the probable alignment of a traditional trade route (now the Hermosa Greenbelt and former railroad right-of-way). Trade routes were heavily used by the tribe for movement of trade items, visiting family, going to ceremonies, accessing recreation areas, and accessing foraging areas. As such, these areas can contain seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and isolated burials and cremations. Watercourses and water bodies within the region may have also supported seasonal or permanent settlements, seasonal or permanent trade depots, ceremonial and religious prayer sites, and burials and cremation sites. Additionally, salt beds in the region provided unique minerals and salts that

were used for food flavoring and preservation, medicinal therapies and cleansers, and spiritual ceremonies in sand drawings.

Due to the concerns raised by the Gabrieleño Band of Mission Indians – Kizh Nation during AB 52 consultation, MM CUL-1a and MM CUL-2 would be required in order to avoid impacting or destroying potential previously unknown resources that may be inadvertently unearthed during the ground disturbing activities. Implementation of these measures would ensure that any potential impacts associated with Phase 1 and Phase 2 of the proposed Project would remain *less than significant with mitigation*. Pursuant to Public Resources Code Section 21082.3(d) consultation with the Gabrieleño Band of Mission Indians – Kizh Nation was concluded on December 15, 2020.

Residual Impact

With the implementation of MM CUL-1a and MM CUL-2, the potential for impacts to archaeological resources would be *less than significant*. In the event of an unanticipated discovery there would be a clear Treatment Plan and any required testing or data recovery would be completed, as necessary.

Cumulative Impacts

A cumulative impact to cultural resources would result if the impacts associated with the proposed Project, along with other pending, approved, and recently completed projects in Redondo Beach, Torrance, and the other neighboring South Bay communities would cumulatively impact historic architectural resources, archaeological resources, or tribal cultural resources. Excavation, grading, and other ground disturbing activities associated with cumulative development in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach (refer to Section 3.0.2, *Cumulative Impacts*) could increase the potential for prehistoric or historic cultural resources to be altered, disturbed, or otherwise damaged. The potential to create adverse cumulative impacts to such resources depends on the nature of each project, including its specific site and surroundings. However, all pending, approved, or recently completed projects would be required to comply with the laws and regulations related to historic architectural resources, archeological resources, discovery of human remains, and tribal cultural resources cited and discussed in the analysis above. Given the extensive ground disturbance that has occurred previously, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources and the potential for the proposed Project improvements to impact previously unknown prehistoric or historic-period archaeological resources is considered to be low. Additionally, with implementation of MM CUL-1a and -1b ~~and~~ as well as MM CUL-2, in the unlikely event that buried cultural resources are discovered during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop and a qualified

archaeologist and/or Native American monitor shall evaluate the significance of the discovery based on the Treatment Plan prior to resuming any activities that could impact the discovery. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary. Therefore, regardless of the potential impacts of other pending, approved, and recently completed projects, the proposed Project would have less than significant residual impacts and *would not substantially contribute to cumulatively significant impacts*.

## 3.5 ENERGY

This section of the Environmental Impact Report (EIR) describes the existing energy sources, energy providers, and infrastructure within the region, including the Project site and the surrounding vicinity. This impact analysis assesses the potential short- and long-term energy consumption that could result from the construction and operation of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project). The description of the physical setting and environmental impacts provided in this EIR is consistent with the intent and requirements of Appendix F, *Energy Conservation* of the California Environmental Quality Act (CEQA) Guidelines. The analysis considers the conformance of the proposed Project with all applicable State and local energy conservation regulations and policies (e.g., compliance California Title 24 Building Energy Efficiency Standards [Part 6] CALGreen [Part 11]). Emissions of criteria air pollutants and greenhouse gases (GHG) due to energy consumption are addressed in Section 3.2, *Air Quality* and 3.7, *Greenhouse Gas Emissions and Climate Change*.

### 3.5.1 Environmental Setting

<u>Electricity</u>

Generation of electricity requires the consumption of energy produced by a mix of non-renewable and renewable sources. Energy production, consumption, research, and conservation efforts within the State of California are managed by the California Energy Commission (CEC). Southern California Edison Company (SCE) provides electricity to approximately 15 million people, 15 counties, and 180 incorporated cities across Central and Southern California, including Redondo Beach and Torrance (SCE 2019).

In 2018, approximately 218,120,200,000 kilowatts (kWh) (218,120.2 gigawatts [GWh]) of electricity were consumed in the State and approximately 67,856,281,249 kWh (67,856.3 GWh) of electricity were consumed in Los Angeles County. Of the electricity consumed in the State, 46.54 percent was generated by natural gas-fired power plants, 0.15 percent was generated by coal-fired power plants, 11.34 percent was generated by large hydroelectric dams, 0.24 percent was generated by oil and other petroleum or waste heat, 9.38 percent was generated by nuclear power plants. The remaining 32.35 percent of electricity production in the State was generated by renewable sources including biomass, geothermal, small hydroelectric dams, solar, and wind power. An additional 30,095 GWh of electricity, or approximately 10.54 percent of the State's total energy mix, was provided from imported sources (CEC 2019b).

In 2012, the most recent year of publicly available data provided in the Redondo Beach and Torrance Energy Efficiency Climate Action Plans (EECAPs), approximately 498,141,349 kWh of electricity were consumed within Redondo Beach and approximately 1,733,990,505 kWh were consumed within Torrance (South Bay Cities Council of Governments [SBCCOG] 2015a, 2015b).

**Table 3.5-1. State, County, and City Electricity Consumption**

| Year | Area | Population | Electricity Demand (kWh) | |
|---|---|---|---|---|
| | | | Total | Per Capita |
| 2018 | State of California | 39,557,045 | 218,120,200,000 | 5,514.07 |
| 2018 | Los Angeles County | 10,105,518 | 67,856,281,249 | 6,714.78 |
| 2012 | Los Angeles County | 9,935,000 | 69,274,866,576 | 6,972.81 |
| 2012 | Redondo Beach | 67,459 | 498,141,349 | 7,242.60 |
| 2012 | Torrance | 146,340 | 1,733,990,505 | 11,697.82 |

Notes: The most recent publicly available data for the Redondo Beach and Torrance is provided in the Redondo Beach and Torrance EECAPs.
Source: CEC 2019a; U.S. Census Bureau 2019; SBCCG 2015b, 2015a.

There are four power plants in the South Bay, which are located in Alamitos, Huntington Beach, and Redondo Beach, that AES Corporation (AES)~~,~~ bought from SCE in 1998. The AES Redondo Beach Power Plant, which provides electricity to the system-wide grid and supports peak usage on hot days, was slated for retirement on December 31, 2020 in accordance with the State Water Resources Control Board (SWRCB) Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Once-Through Cooling [OTC] Policy). The OTC Policy, which became effective on October 1, 2010, mandated the phasing out of *"once-through cooling,"* a process that uses ocean water to cool turbines and endangers marine life. However, in the aftermath of a heatwave and two rolling blackouts in California in Summer 2020, the SWRCB voted to amend its policy, extending compliance dates for the four power plants in the South Bay. This amendment gave the AES Redondo Beach Power Plant license to operate until December 2021. Redondo Beach and Torrance are also served by electrical infrastructure (e.g., substations, transmission lines, transformers, overhead and underground power lines, etc.) with maintenance and periodic upgrades provided by SCE, as necessary. Overhead power lines

*Overhead powerlines are located adjacent to the east of the Project site along Flagler Lane through Flagler Alley. Similarly, overhead power lines are also provided along North Prospect Avenue.*

and SCE service poles are provided located along North Prospect Avenue and Flagler Lane. A buried power line is located to the northwest between the Project site and the Redondo Village Shopping Center.

The estimated electricity demand for the operation of the existing residential, medical office, office, health and fitness, and community services uses at the existing BCHD campus is approximately 2,378,070 kWh per year, ~~far~~ less than 0.~~1~~5 percent of total electricity demand in Redondo Beach (see Table 3.5-2; see Appendix E).

**Table 3.5-2. Estimated Annual Electricity Demand of the BCHD Campus**

| Equivalent Land Use Type at the Existing BCHD Campus | Area (sf /unit) | Annual Usage (kWh/year) |
|---|---|---|
| **Beach Cities Health Center** | | |
| Residential (Memory Care) | 60 units | 166,963 |
| Medical Office | 42,103 sf | 589,021 |
| General Office | 15,810 sf | 221,182 |
| Day-Care Center | 9,717 sf | 59,079 |
| Health Club (Center for Health and Fitness) | 12,294 sf | 103,884 |
| College (Regents of the University of California; California State University of Dominguez Hills Classrooms) | 1,519 sf | 18,760 |
| **Beach Cities Advanced Imaging Building** | | |
| Medical Office | 45,913 | 642,322 |
| **Providence Little Company of Mary Medical Institute Building** | | |
| Medical Office | 46,881 | 576,859 |
| **Total** | | **2,378,070** |

Notes: Some square footage does not generate energy demand (e.g., janitorial closets, storage, etc.) and therefore, is not included in the estimate of energy demand for the existing campus.
Sources: See Appendix B and Appendix E.

Natural Gas

Natural gas is a fossil fuel formed when layers of buried organic matter are exposed to intense heat and pressure over thousands of years. The energy is stored in the form of hydrocarbons and can be extracted in the form of natural gas, which can be combusted to generate electricity or can be used directly for heating, cooking, and other use. The Southern California Gas Company (SoCal Gas) provides natural gas to 21.8 million consumers in more than 500 communities. Redondo Beach and Torrance are located in SoCalGas's Pacific Region, which includes all of the coastal areas between Long Beach and Ventura (SoCalGas 2019).

In 2018, approximately 12,665,640,779 therms of natural gas were consumed in the State and 2,921,507,284 therms of natural gas were consumed in Los Angeles County (see Table 3.5-3; CEC 2018b, 2019a).

In 2012, the most recent year of publicly available data provided in the Redondo Beach and Torrance EECAPs, approximately 15,486,097 therms of natural gas were consumed within the Redondo Beach and approximately 50,300,801 therms of natural gas were consumed within Torrance (SBCCG 2015a, 2015b). Natural gas is delivered to the cities by SoCalGas through their integrated pipeline system. The majority of this natural gas is produced outside of the State while a small supply is produced locally in Central and Southern California from onshore and offshore fields. All residential and commercial areas within Redondo Beach and ~~the~~ Torrance are served by buried natural gas infrastructure, with maintenance and periodic upgrades provided by SoCalGas, as necessary. A natural gas line is located beneath North Prospect Avenue. Natural gas is delivered to the Project site from this line through another located along the eastern boundary of the Project site paralleling Flagler Lane. After passing through a meter, natural gas is delivered to the Beach Cities Health Center and attached Maintenance Building through a 3-inch and 2-inch natural gas line, respectively.

*The attached Maintenance Building supports the Beach Cities Health Center and serves as a centralized distribution point for electricity and natural gas utilities.*

**Table 3.5-3. State, County, and City Natural Gas Consumption**

| Year | Area | Population | Natural Gas Demand (therms) | |
|---|---|---|---|---|
| | | | Total | Per Capita |
| 2018 | State of California | 39,557,045 | 12,665,640,779 | 320.19 |
| 2018 | Los Angeles County | 10,105,518 | 2,921,507,284 | 289.10 |
| 2012 | Los Angeles County | 9,935,000 | 2,958,817,134 | 297.82 |
| 2012 | Redondo Beach | 67,459 | 15,486,097 | 229.56 |
| 2012 | Torrance | 146,340 | 50,300,801 | 343.73 |

Notes: Natural gas consumption data was not available from the CEC for Lake, Mariposa, and Sierra Counties for 2018; therefore, the total and per capita gas consumption for the State may be slightly greater than reported in this table. The most recent publicly available data for Redondo Beach and Torrance is provided in the Redondo Beach and Torrance EECAPs.
Sources: CEC 2019a; U.S. Census Bureau 2019; SBCCG 2015b, 2015a.

The estimated natural gas demand for operation of the existing residential, medical office, office, health and fitness, and community services uses at the existing campus is 2,252,693 thousand British thermal units (kBTU) (approximately 22,532 therms) per year, approximately 0.14 percent ~~far~~ less than ~~0.1 percent of~~ total ~~electricity~~ natural gas demand in Redondo Beach (see Table 3.5-4; see Appendix E).

**Table 3.5-4. Estimated Annual Natural Gas Demand of the BCHD Campus**

| Land Use | Area (sf /unit) | Annual Usage (kBTU/year) | Annual Usage (therms/year) |
|---|---|---|---|
| **Beach Cities Health Center** | | | |
| Residential (Memory Care) | 60 units | 479,953 | 4,801 |
| Medical Office | 42,103 sf | 384,821 | 3,849 |
| General Office | 15,810 sf | 144,503 | 1,445 |
| Day-Care Center | 9,717 sf | 115,049 | 1,151 |
| Health Club (Center for Health and Fitness) | 12,294 sf | 256,945 | 2,570 |
| College (Regents of the University of California; California State University of Dominguez Hills Classrooms) | 1,519 sf | 23,286.3 | 233 |
| **Beach Cities Advanced Imaging Building** | | | |
| Medical Office | 45,913 | 419,644 | 4,197 |
| **Providence Little Company of Mary Medical Institute Building** | | | |
| Medical Office | 46,881 | 428,491 | 4,286 |
| **Total** | | **2,252,693** | **22,532** |

Notes: Some square footage does not generate energy demand (e.g., janitorial closets, storage, etc.) and therefore, are not included in the estimate of energy demand for the existing campus.
1 therm is equal to approximately 99,976.1 BTUs.
Sources: See Appendix B and Appendix E.

Transportation Energy

According to the CEC, transportation accounts for nearly 40 percent of the total energy demand throughout the State and approximately 39 percent of the GHG emissions throughout the State (CEC 2018a). In 2018, California consumed 14.24 billion gallons of gasoline (including aviation fuel) and 3.07 billion gallons of diesel fuel (California Department of Tax and Fee Administration 2019). The California Department of Transportation (Caltrans) reports that approximately 25.5 million automobiles, 5.76 million trucks, and 881,386 motorcycles were registered in the State as of January 1, 2018, resulting in a total estimated 344.3 billion vehicle miles traveled (VMT) in 2017 and 13 billion gallons of transportation fuel consumed (Caltrans 2018a, 2018b). Within Redondo Beach, approximately 538,339,762 miles were traveled by gasoline-, diesel-, and

electric-powered vehicles in 2012, accounting for approximately 0.15 percent of the total VMT throughout the State (SBCCG 2015a). Within Torrance, approximately 1,369,046,211 miles were traveled by gasoline-, diesel-, and electric-powered vehicles in 2012, accounting for approximately 0.4 percent of the total VMT throughout the State (SBCCG 2015b). However, Redondo Beach and Torrance have adopted several policies and regulations to reduce VMT, encourage the use of electric vehicles, and prioritize mass transit services. The Redondo Beach EECAP projected that VMT and the demand for gasoline will decline over the next 15 years and will be approximately 5.7 percent lower than 2012 levels by the year 2035 (SBCCG 2015a). The Torrance EECAP projects that VMT and the demand for gasoline will slow over the next 20 years, but will be 6.7 percent greater than 2012 levels by the year 2035 (SBCCG 2015b).

Solar Energy

Currently, there is no publicly available data on the amount of solar energy produced and consumed in either Redondo Beach or Torrance. However, both cities' Climate Action Plans include multiple goals and objectives to expand the solar energy sector. Additionally, both cities promote solar energy use by providing streamlined solar permitting processes and through the Home Energy Renovation Opportunity (HERO) program, which is a financing mechanism for residential and commercial properties so homeowners and businesses can finance energy and water efficiency projects, such as renewable energy production.

### 3.5.2 Regulatory Setting

Federal Policies and Regulations

At the Federal level, the U.S. Environmental Protection Agency (USEPA), U.S. Department of Energy, and U.S. Department of Transportation are the three agencies with the most direct influence over national energy policies, especially transportation energy consumption. Generally, these Federal agencies establish and enforce fuel economy standards for automobiles and light trucks, fund energy-related research and development projects, and fund transportation infrastructure projects to manage transportation energy resource demand.

State Policies and Regulations

California has adopted legislation to address issues related to various aspects of energy consumption and efficiency. Several regulatory entities administer energy policy throughout the State. The CEC is the primary energy policy and planning agency in California, and is responsible for ensuring a safe, resilient, and reliable supply of energy. The CEC has seven core responsibilities: advancing state energy policy, encouraging energy efficiency, certifying thermal

power plants, investing in energy innovation, developing renewable energy, transforming transportation, and preparing for energy emergencies. The California Public Utilities Commission (CPUC) is a State agency that regulates privately owned utilities providing telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation services. The CPUC is responsible for assuring that California utility customers have safe, reliable utility services at reasonable rates, while protecting utility customers from fraud. The CPUC regulates the planning of and approval for the physical construction of electric generation, transmission, and distribution facilities as well as local distribution pipelines for natural gas. The California Air Resources Board (CARB) has adopted long-term plans and polices to address GHGs (e.g., 2017 Scoping Plan Update), which are discussed in detail within Section 3.7, *Greenhouse Gas Emissions and Climate Change*.

*California Building Standards Code*

The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR] Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically – typically every 3 years – to allow for the consideration and inclusion of new energy efficiency technologies and methods. The Energy Efficiency Standards for Residential and Nonresidential Buildings focus on several key areas to improve the energy efficiency of renovations and addition to existing buildings as well as newly constructed buildings and renovations and additions to existing buildings. The major efficiency improvements to the residential standards involve improvements for attics, walls, water heating, and lighting, whereas the major efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers 90.1-2013 national standards. Further, the standards require that enforcement agencies determine compliance with the CCR Title 24, Part 6 before issuing building permits for any construction.

*California Green Building Standards Code*

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to *"improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact*

*and encouraging sustainable construction practices in the following categories: 1) planning and design; 2) energy efficiency; 3) water efficiency and conservation; 4) material conservation and resource efficiency; and 5) environmental air quality."* The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and nonresidential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.

*CEQA Guidelines*

Appendix F, *Energy Conservation* of the CEQA Guidelines expresses the goal of conserving energy in the State of California and provides guidance for the analysis of energy impacts. Under CEQA (Public Resources Code Section 21100[b][3]), EIRs must include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F lists the following methods to achieve this goal: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on natural gas and oil; and 3) increasing reliance on renewable energy sources. In addition to building code compliance, relevant considerations may include, among others, the project size, location, orientation, equipment use and any renewable energy features that are incorporated into the project (CEQA Guidelines Section 15126.2[b]).

Regional and Local Policies and Regulations

*Southern California Association of Governments*

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties. SCAG addresses regional issues related to transportation, the economy, community development, and the environment. SCAG develops plans pertaining to transportation, growth management, hazardous waste management, housing, and air quality. SCAG prepares the Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) that supports the land use and transportation components of the Air Quality Management Plans (AQMPs), which provide GHG-reduction co-benefits (see Section 3.7, *Greenhouse Gas Emissions and Climate Change* as well as Section 3.14, *Transportation*). ~~The 2016-2040 RTP/SCS, adopted on April 7, 2016, integrates land use and transportation strategies to achieve required emission reductions consistent with Senate Bill (SB) 375 of 8 percent by 2020 and 13 percent by 2035 relative to the base year of 2005.~~ On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt the 2020-2045

RTP/SCS (Connect SoCal) (SCAG 2020). The 2020-2045 RTP/SCS includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections. The intent of the plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal plan achieves per capita GHG emissions reductions relative to 2005 of 19 percent in 2035 (SCAG 2020). The RTP/SCS set forth a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, aims to reduce GHG emissions from automobiles and light trucks consistent with CARB targets for SCAG.

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Housing Element*

Policy 2.5 Promote the use of energy conservation features in the design of residential development to conserve natural resources and lower energy costs.

*Redondo Beach Climate Action Plan and Energy Efficiency Climate Action Plan*

Redondo Beach, in concert with the SBCCOG, is committed to providing a more livable, equitable, and economically vibrant community and subregion through the implementation of energy efficiency measures. The Climate Action Plan, which was adopted in 2017, contains goals and policies that incorporate energy use reduction into municipal and community operations (SBCCOG 2017a). The Climate Action Plan includes a list of non-binding goals and strategies in the following five categories:

- Land Use and Transportation. Facilitate pedestrian and neighborhood development and identify ways to reduce automobile emissions including supporting zero emission vehicle infrastructure, improving pedestrian and bicycle infrastructure, enhancing public transit service, and supporting reductions in single-occupancy vehicle use.
- Energy Efficiency. Emphasize energy efficiency retrofits for existing buildings, energy performance requirements for new construction, water efficient landscaping, financing programs that will allow home and business owners to obtain low-interest loans for implementing energy efficiency in their buildings.
- Solid Waste. Focus on increasing waste diversion and encouraging participation in recycling and composting throughout the community.

- Urban Greening. Create carbon sinks as they store GHG emissions that are otherwise emitted into the atmosphere as well as support health of the community.
- Energy Generation. Demonstrate the City's commitment to support the implementation of clean, renewable energy while decreasing dependence on traditional, GHG emitting power sources.

The Redondo Beach EECAP, adopted in December 2015, served as a foundation for developing the 2017 Climate Action Plan. The EECAP includes a detailed description of methodology, a comprehensive GHG and energy inventory for 2012, and a forecast for the years 2020 and 2035. Development and adoption of the EECAP allows the City of Redondo Beach to:

- Understand its municipal and community energy use and GHG emissions now and in the future;
- Identify strategies at the local level that will result in long-term energy efficiency;
- Develop a plan to implement strategies; and
- Monitor and report progress toward energy-efficiency goals.

*Sustainable Development Plan*

In 2004, Redondo Beach created a Strategic Development Plan to encourage and promote sustainable development through policies, strategies, and programs. The plan's goals include increasing community awareness of sustainable development, revising codes to promote sustainable urban design, sustainable building practices in Redondo Beach, increasing water and energy resource conservation, and increasing sustainable transportation practices.

*Sustainable City Plan*

The Redondo Beach City Council established a Green Task Force in 2007 to educate the public on the importance of environmental best practices to meet Federal, State, and regional regulations, to advise on how to best prepare for meeting higher environmental standards locally and regionally, and to address environmental disaster mitigation. Redondo Beach's Green Task Force created the Sustainable City Plan, presented to City Council in 2008. The plan is a compilation of sustainable recommendations addressing five issue areas, including Economic Vitality and Regional Issues; Housing and Building; Open Space, Land Use and Trees; Resource Conservation; and Transportation.

*Redondo Beach Municipal Code*

Section 9-23.01: The City adopted a Green Building Ordinance in 2008, with updates in 2019. This ordinance requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction, major remodels, and new or remolded landscapes.

City of Torrance Local Policies and Regulations

*Torrance General Plan Community Resource Element*

Objective CR.13: To contribute to the improvement of local and regional ambient air quality to benefit the health of all.

Policy CR.13.5 Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.

Policy CR.13.7 Encourage the use of alternative fuel vehicles and re-refined oil.

Policy CR.13.8 Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.

Objective CR.14: To reduce the City of Torrance's overall carbon footprint and counteract the effects of global warming through a reduction in the emissions of GHGs within Torrance.

Policy CR.14.1 Support the CARB in its ongoing plans to implement Assembly Bill (AB) 32, and fully follow any new AB 32-related regulations.

Policy CR.14.2 Develop and implement GHG emissions reduction measures, including discrete, early-action GHG-reducing measures that are technologically feasible and cost-effective.

Policy CR.14.3 Pursue actions recommended in the U.S. Mayors Climate Protection Agreement to meet AB 32 requirements.

Policy CR.14.4 Act as a leader and example in sustainability and reduction in GHG emissions by conducting City business in the most GHG-sensitive way.

Objective CR.21: The efficient use and conservation of energy resources to reduce consumption of natural resources and fossil fuels.

Policy CR.21.1 Promote and encourage energy resource conservation by the public sector, private sector, and local school district.

Policy CR.21.3 Support the development and use of non-polluting, renewable energy resources.

Policy CR.21.4 Encourage the construction of homes and buildings that exceed Title 24 standards. Consider adoption of regulations requiring greater energy efficiency in new or remodeled larger homes and businesses.

Policy CR.21.5 Educate residents and businesses about the benefits of energy efficiency technologies and practices, such as solar panels and low-energy appliances.

Policy CR.21.6 Promote energy-efficient design features, including appropriate site orientation, use of light-colored roofing and building materials, and use of trees to reduce fuel consumption for heating and cooling.

Policy CR.21.7 Encourage owners to retrofit existing buildings with energy-conserving lighting fixtures. Also encourage owners to equip new buildings with energy-efficient lighting devices and to design projects to take full advantage of natural lighting.

Policy CR.21.8 Explore and consider the cost/benefits of alternative fuel vehicles including hybrid, natural gas, and hydrogen-powered vehicles when purchasing new City vehicles.

Objective CR.24: To encourage and promote green building methods and practices within Torrance.

Policy CR.24.1 Encourage sustainable construction practices and the use of energy-saving technology. Consider establishing a green building program that draws from the Leadership in Energy and Environmental Design (LEED) standards.

Policy CR.24.3 Explore the feasibility of adopting green building requirements for all new commercial and industrial development projects of large scale.

Policy CR.24.4 Provide information to the residents and the residential development community about options for *"going green"* in residential construction, including option for Low Impact Development.

*Torrance Climate Action Plan*

The City, in coordination with SBCCOG, prepared the Torrance Climate Action Plan in order to reduce GHG emissions (SBCCOG 2017b). The Torrance City Council adopted the Torrance Climate Action Plan on December 12, 2017. The City has established GHG reduction goals for year 2020 (15 percent below 2005 levels) and for year 2035 (49 percent below 2005 levels). The Climate Action Plan includes a list of non-binding goals and strategies in the following the same five general categories as the Redondo Beach's Climate Action Plan listed above (SBCCOG 2017b).

Similar to Redondo Beach's EECAP, the Torrance EECAP served as a foundation for developing the 2017 Climate Action Plan. The EECAP includes a detailed description of methodology, a comprehensive GHG and energy inventory for 2012, and a forecast for the years 2020 and 2035, and is provided in Appendix A to Torrance's Climate Action Plan.

*Trip Reduction and Traffic Management Ordinance*

In order to reduce mobile source emissions, Torrance has adopted a Trip Reduction and Traffic Management Ordinance (Torrance Municipal Code [TMC] Division 9 Chapter 10) to incentivize walking, cycling, use of public transit, and carpooling to work. Prior to approval of any new development project for which an EIR will be prepared, Torrance shall identify and consult with the regional and municipal fixed-route transit operators providing service to the project.

*Torrance Municipal Code*

Section 8.113: TMC Chapter 8.113 adopts by reference the CALGreen requirements with the local amendments that require reuse or recycling of all trees, stumps, rocks and associated vegetation and soils removed from land clearing.

### 3.5.3 Impact Assessment Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines and Appendix F, *Energy Conservation* of the CEQA Guidelines as well as State and local sustainability policies.

For purposes of this EIR, the proposed Project may have a significant adverse impact related to energy if:

a) The project would result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

b) The project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Appendix F, *Energy Conservation* of the CEQA Guidelines, which provide assistance to lead agencies with regard to evaluation of impacts related to energy resources in EIRs, recommends consideration of the following environmental impacts to the extent relevant and applicable:

a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

b) The effects of the project on local and regional energy supplies and on requirements for additional capacity.

c) The effects of the project on peak and base period demands for electricity and other forms of energy.

d) The degree to which the project complies with existing energy standards.

e) The effects of the project on energy resources.

f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Methodology

The impact analysis provided in this section of the EIR utilizes data from the CEC, Redondo Beach and Torrance EECAPs as well as land use and emissions assumptions from the California Emissions Estimator Model (CalEEMod) consistent with the air quality analysis provided in Section 3.2, *Air Quality* and Section 3.7, *Greenhouse Gas Emissions and Climate Change* (see

Appendix B and Appendix E). Based on these resources, this analysis assesses the availability and level of energy services, any planned improvements to or changes in these utilities, and projected increases in energy demand associated with future residential and commercial development at the campus.

Electricity and natural gas demand were estimated using State-wide average energy consumption factors by land use as documented in the CEC's California Commercial End-use Survey (CEC 2006). As described further in the impact analysis below, these factors do not account for the sustainability features described for the proposed Project including photovoltaic solar panels, solar hot water systems, high efficiency heating, ventilation, and air conditioning (HVAC) systems, etc. (refer to Section 2.5.1.5, *Sustainability Features*). Additionally, this analysis does not account for the Transportation Demand Management (TDM) that would be prepared for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). As such, the analysis below presents conservative electricity and natural gas demand estimates as well as conservative fuel consumption estimates.

*Construction*

Construction of the proposed Project – including the Phase 1 preliminary site development plan as well as the Phase 2 development program – would result in energy consumption as a result of the use of heavy-duty construction equipment, on-road trucks, and construction worker commutes to and from the Project site. Energy consumption from heavy-duty construction equipment has been estimated based on the equipment mix analyzed in the CalEEMod, consistent with the air quality analysis in Section 3.2, *Air Quality* and Section 3.7, *Greenhouse Gas Emissions and Climate Change*, and fuel consumption data from the CARB OFFROAD2011 model. The assumption that diesel fuel would be used for all equipment represents the most conservative scenario for maximum potential energy use during construction.

*Operation*

Operation of the proposed Project would result in energy consumption in the form of electricity and natural gas for building heating, air conditioning, cooking, lighting, electronics, and other miscellaneous energy needs. Additionally, operation of the proposed Project would result in the consumption of transportation fuels, primarily gasoline, for vehicles traveling to and from the Project site. Building energy use factors, vehicle trips from all vehicle types to and from the Project site, and vehicle trip lengths from CalEEMod have been used to estimate building energy use and VMT (see Appendix B and Appendix E). The estimated fuel economy for vehicles has been based on fuel consumption factors from the CARB EMission FACtors (EMFAC) emissions model,

which is incorporated into CalEEMod. Therefore, this energy assessment is consistent with the modeling approach used for other quantitative construction and operational analyses provided in this EIR and consistent with general CEQA practices.

### 3.5.4 Project Impacts and Mitigation Measures

Impact Description (EN-1)

*a) The project would result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.*

**EN-1 The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not result in wasteful, inefficient, or unnecessary energy consumption. Conformance with of State regulations including the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11) as well as conformance with the Redondo Beach and Torrance General Plans and Climate Action Plans would ensure that this impact would be *less than significant*.**

As described in Section 3.5.1, *Existing Setting*, overhead power lines are located along North Prospect Avenue as well as Flagler Lane and Flagler Alley. Additionally, a buried natural gas line is located on the eastern edge of the Project site serving the Beach Cities Health Center and the attached Maintenance Building.

The proposed development under Phase 1 and Phase 2 of the proposed Project would be tied into the existing points of connection along North Prospect Avenue. A new electric service would be developed for the Project site – including the development of an underground on-site distribution system – that would replace the existing electrical service at the Project site. The 16 kilovolt (kV) or 4.16 kV line along North Prospect Avenue would be brought onto the Project site from a service drop along North Prospect Avenue. This medium voltage line would be distributed on-site via a proposed distribution system including a SCE Substation, which would be located along the eastern perimeter of the Project site, immediately east of the pedestrian promenade (refer to Figure 2-5 and Figure 2-7). The existing natural gas lines on the campus would be re-routed as necessary to support the new buildings, and the existing lines to the Beach Cities Health Center and attached Maintenance Building would be removed.

*Construction Energy Use*

Construction of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would require energy consumption for on-site demolition, grading, and construction, transport of demolition debris, soil, and construction materials, and construction worker commute trips.

Electricity would be used during demolition, grading, and construction activities to provide temporary power for lighting, electric-powered hand tools, and other equipment. Electricity use during these activities would vary (e.g., depending on lighting needs) and would be temporary for the duration of demolition, grading, and construction, which would occur over 29 months during Phase 1 and 28 months during Phase 2. Energy use during construction would not result in a substantial increase in on-site electricity consumption and would be substantially less than the ongoing operational energy use on-site under existing conditions at the campus. Overall energy impacts associated with construction-related electricity use would be comparable with similarly sized construction projects in the South Bay and would be *less than significant*.

Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. The assumption that diesel fuel would be used for all equipment represents the most conservative scenario for reasonable maximum potential energy use during construction. The total construction fuel consumption has been calculated as the sum of total estimated fuel consumption for each piece of equipment used in each phase of construction. Section 3.0, *Construction Detail* in the CalEEMod Worksheets (see Appendix B and Appendix E), provides detailed construction phasing, construction equipment used in each phase, total number of days worked, equipment horsepower, equipment load factor, and equipment quantities based on typical construction equipment and default model assumptions. These assumptions were used to calculate total fuel consumption for specific construction equipment.

Total fuel consumption has been based on a fuel consumption factor of 0.05 gallons per horsepower per hour (gal/hp/hr) for diesel engines as derived from the South Coast Air Quality Management District (SCAQMD) CEQA Handbook Table A9-3E.

The amount of total fuel required during construction of the proposed Project would be approximately 1,910,839 gallons (see Table 3.5-5). As shown in Table 3.5-5, approximately 91 percent of this fuel consumption (i.e., 1,746,342 gallons of fuel) would be required for construction vehicles, including haul truck trips and construction worker commutes. Total fuel consumption for construction worker commute trips is based on average fuel consumptions for light-duty vehicles

conservatively assuming that 100 percent of construction workers would arrive to the Project site using such vehicles. The average fuel consumption rate for construction vehicle trips has been based on light-duty fuel efficiency estimates from 1990 to 2015, as provided by Bureau of Transportation Statistics. Refer to detailed calculations of Project Construction Fuel Consumption in Appendix E.

**Table 3.5-5. Estimated Project Construction Fuel Consumption**

| Phase | Fuel Consumption from Construction Equipment (Gallons) | Fuel Consumption from Construction Vehicle Trips (Gallons) | Total (Gallons) |
|---|---|---|---|
| Phase 1 | 84,491 | 803,276 | 887,767 |
| Phase 2 | 80,006 | 943,066 | 1,023,072 |
| **Total** | 164,497 | 1,746,342 | 1,910,839 |

Source: See Appendix E.

For comparison purposes, the construction energy demand from transportation fuel has been compared to the Los Angeles County transportation fuel sales. As shown in Table 3.5-6, the proposed Project would represent a very small fraction – less than 1 percent – of the County's total 2018 fuel consumption and would not result in a substantial increase in fuel consumption. The total fuel consumption associated with the proposed Project would be comparable with similarly sized construction projects in the South Bay.

**Table 3.5-6. Comparison of Project-related Diesel Fuel Consumption to Annual County Diesel Fuel Consumption**

| | Diesel Fuel Consumption (Gallons) |
|---|---|
| Annual Los Angeles County (2018) | 228,000,000 |
| Total Project Construction (including Phase 1 and Phase 2) | 1,910,839 |

Source: CEC 2018a.

Compliance with State and local policies, such as the State law prohibiting heavy-duty diesel vehicles from idling for longer than 5 minutes (Public Resources Code Title 13, Section 2485; refer to Section 3.2, *Air Quality*) would minimize energy consumption. Additionally, the implementation of the Air Quality Management Plan required under Mitigation Measure (MM) AQ-1 would require the use of more efficient USEPA Tier 4 Final engines on all construction equipment, except crushing equipment, to reduce diesel particulate matter emissions. Overall impacts associated with construction-related fuel use would be *less than significant*.

The proposed construction activities would not result in substantial use of natural gas or other energy sources.

*Operational Vehicle Fuel Consumption*

Phase 1 of the proposed Project would result in a reduction of 1,920 daily vehicle trips to the campus compared to existing conditions (see Section 3.14, *Transportation*) and would therefore result in a reduction in operational vehicle fuel consumption. Phase 2 would result in an increase of 376 daily vehicle trips compared to existing conditions. However, this 6-percent increase in daily vehicle trips compared to existing conditions would be minor and would not result in wasteful, inefficient, or unnecessary energy consumption.

Using vehicle fleet mix data provided in Appendix B and Appendix E and average fuel economy information provided by the Bureau of Transportation Statistics, the annual VMT associated with the proposed Project would result in the consumption of approximately 189.9 gallons of fuel per day (see Table 3.5-7), or an estimated 69,313.5 gallons per year. The proposed Project would represent a very small fraction – far less than 1 percent – of the Redondo Beach's total fuel consumption (an estimated 30.3 million gallons). Additionally, the location of the Project site close to several stops along Beach Cities Transit Line 102 and the provision for multi-modal transportation (see Section 3.14, *Transportation*) would incrementally reduce operational vehicle fuel consumption. Further, the proposed Project would implement a Transportation Demand Management Plan under MM T-1 to further minimize VMT and thereby further reduce operational vehicle fuel consumption (see Section 3.14, *Transportation*).

**Table 3.5-7. Comparison of Project and Redondo Beach Transportation Fuel Usage**

| Vehicle Type | Percent of Vehicle Trips[1] | Daily VMT | Average Fuel Economy (miles/gallon)[2] | Total Daily Fuel Consumption (gallons) |
|---|---|---|---|---|
| Passenger Cars | 55.2 | 1,865 | 23.3 | 80 |
| Light/Medium Duty Vehicles | 36.0 | 1,216 | 17.1 | 71 |
| Heavy Duty Vehicles/Other | 8.3 | 281 | 7.3 | 38.5 |
| Motorcycles | 0.5 | 17 | 43.4 | 0.4 |
| **Total** | **100%** | **3,379[3]** | **--** | **189.9** |

| Redondo Beach 2012 VMT | | Redondo Beach 2012 Fuel Consumption[4] | |
|---|---|---|---|
| Daily | Annual | Daily | Annual |
| 1,474,904 | 538,339,762 | 82,932 | 30,270,180 |

Notes:
[1] Percentage of Vehicle Trips and Fleet Mix information provided in Table 4.4, *Fleet Mix* of Appendix E.
- Passenger Cars is the sum of the light-duty-auto fleet mix trip percentage column.

- Light/Medium Duty Vehicles is the sum of the LDT1, LDT2, and MDV fleet mix trip percentage columns. LDT = light-duty truck; MDV = medium-duty vehicle
- Heavy Duty Vehicles/Other is the sum of the LHD1, LHD2, MHD, HHD, and bus fleet mix trip percentage columns. LHD = light-heavy-duty; MHD = medium-heavy-duty; HHD – heavy-heavy-duty

Motorcycles is the sum of the MCY fleet mix trip percentage column. MCY = motorcycle

[2] Average fuel economy based on average 2014 U.S. vehicle fuel efficiency (mpg) from Table 4-12: Average Light Duty Vehicle, Long Wheel Base Fuel Consumption and Travel, and Table 4-13: Single-Unit 2-Axle 6-Tire or More Truck Fuel Consumption and Travel of the *National Transportation Statistics.*

[3] Phase 2 Daily VMT provided in Appendix B.

[4] Based on the same fleet mix presented for the proposed Project.

Source: See Appendix B, CalEEMod Worksheets, Section 4.2. *Trip Summary Information*; Bureau of Transportation Statistics 2016; SBCCOG 2015a.

Although the increased VMT associated with the proposed Project following the completion of Phase 2 would result an increase in the consumption of transportation fuels, the proposed Project would not result wasteful, inefficient, or unnecessary energy consumption. Operational impacts associated with long-term energy consumption would be *less than significant*.

*Operational Energy Consumption*

As previously described, the existing campus is estimated to consume 2,378,070 kWh of electricity per year and 2,252,693 kBTU (22,532 therms) of natural gas per year. The campus was constructed in 1958 beginning with the construction of the former South Bay Hospital and, therefore, was not designed or constructed to meet current State and local energy efficiency standards.

Operation of the proposed Project would permanently increase the demand for electricity and natural gas. However, as required by RBMC and TMC, all new buildings on the Project site would conform with the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11) (refer to Section 2.5.1.5, *Sustainability Features*). Compliance with these standards would reduce the amount of energy consumed for heating and cooling, lighting, and other electricity and natural gas consumption relative to existing conditions and would ensure that operational energy consumption associated with the proposed Project would not be wasteful, inefficient, or unnecessary. Additionally, as described in Phase 2.5.1.5, *Sustainability Features*, the proposed Project would include photovoltaic solar panels, solar hot water systems, and high efficiency HVAC systems. New buildings would also meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification. These features of the proposed Project would further reduce the operational demand for electricity and natural gas compared to the projections in Table 3.5-8 and Table 3.5-9.

The proposed Project would slightly decrease electricity demand following buildout of Phase 1 and would increase electricity demand following buildout of Phase 2. The overall estimated increased electricity demand following the completion of Phase 2 would be 4,989,622 kWh per year (refer to Table 3.5-1), for a net increase in electricity demand of 2,611,552 kWh per year as

compared to existing conditions (refer to Table 3.5-2). This estimated increase corresponds with approximately 0.5 percent of electricity consumption in the Redondo Beach in 2012.

### Table 3.5-8. Estimated Annual Electricity Demand of the Proposed Project

| Land Use | Area (sf /unit) | Annual Usage (kWh/year) |
|---|---|---|
| **Phase 1** | | |
| Residential (Assisted Living and Memory Care) | 217 units | 862,640 |
| PACE Services | 14,000 sf | 195,860 |
| Community Services | 6,270 sf | 529,81.5 |
| Youth Wellness Center | 9,100 sf | 69,325 |
| Surface Parking Lot | 40,725 sf | 16,520 |
| **Phase 1 Total** | | **1,144,345** |
| **Phase 2** | | |
| Health Club (Aquatics Center and Center for Health and Fitness) | 51,300 sf | 480,817 |
| Wellness Pavilion | 37,150 sf | 283,015 |
| Parking Garage | 292,500 sf | 3,081,445 |
| Phase 1 Annual Electricity Demand | | 1,144,345 |
| **Phase 2 Total** | | **4,989,622** |
| *Existing Site Demand* | | *2,378,070* |
| ***Project-Related Net Increase in Electricity Demand*** | | ***2,611,552*** |

Note: Some uses do not generate energy demand (e.g., janitorial closets, storage, etc.) and therefore, are not included in the estimate of energy demand for the existing campus.
Source: see Appendix B and Appendix E.

### Table 3.5-9. Estimated Annual Natural Gas Demand of the Proposed Project

| Land Use | Area (sf /unit) | Annual Usage (kBTU/year) | Annual Usage (therms/year) |
|---|---|---|---|
| **Phase 1** | | | |
| Residential (Assisted Living and Memory Care) | 217 units | 2,479,760 | 24,804 |
| PACE Services | 14,000 sf | 127,960 | 1,280 |
| Community Services | 6,270 sf | 131,043 | 1,311 |
| Youth Wellness Center | 9,100 sf | 171,468 | 1,715 |
| Surface Parking Lot | 42,750 sf | 0 | 0 |
| **Phase 1 Total** | | **2,910,231** | **29,110** |
| **Phase 2** | | | |
| Health Club (Aquatics Center and Center for Health and Fitness) | 51,300 sf | 1,189,239 | 11,895 |
| Wellness Pavilion | 37,150 sf | 700,002 | 7,002 |
| Parking Structure | 292,500 sf | 0 | 0 |
| Phase 1 Annual Natural Gas Demand | | 2,910,231 | 18,897 |
| **Phase 2 Total** | | **4,799,472** | **48,007** |

| Land Use | Area (sf /unit) | Annual Usage (kBTU/year) | Annual Usage (therms/year) |
|---|---|---|---|
| *Existing Site Demand* | | *2,252,693* | *22,532* |
| ***Project-Related Net Increase in Natural Gas Demand*** | | ***2,546,779*** | ***25,475*** |

Note: Some uses do not generate energy demand (e.g., janitorial closets, storage, etc.) and therefore, are not included in the estimate of energy demand for the existing campus.
Source: see Appendix B and Appendix E.

The natural gas demand for the proposed Project would increase existing natural gas demand during both Phase 1 and Phase 2. The overall estimated net increase in natural gas demand following the completion of Phase 2 would be 2,546,779 kBTU (25,475 therms) per year (see Table 3.5-9). This estimated increase corresponds with approximately 0.2 percent of natural gas consumption in Redondo Beach in 2012.

As previously described, the estimated energy demand is conservative in that it does not account for the sustainability features described for the proposed Project including photovoltaic solar panels, solar hot water systems, high efficiency HVAC systems, etc. (refer to Section 2.5.1.5, *Sustainability Features*).

The proposed Project would not constrain local or regional energy supplies, and would not require the expansion or construction of new system-wide electricity generation and/or transmission facilities. Compliance with the energy requirements established within State and local regulations would prevent wasteful and inefficient energy consumption. Additionally, the achievement of LEED Gold Certification would further reduce operational energy use. Therefore, implementation of the proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary energy consumption and impacts would be *less than significant*.

In summary, energy use during construction would be temporary and would not ~~wound~~ result in a substantial increase in on-site electricity consumption. Diesel fuel required for construction activities would represent a very small fraction – far less than 1 percent – of the total annual fuel consumption of Los Angeles County. Overall energy consumption during construction would be comparable with similarly sized construction projects in the South Bay and be *less than significant*. Operation of the proposed Project would incrementally the regional electricity and natural gas demand by less than 1 percent and would not have substantial impacts on peak and base period demands for electricity, natural gas, or other forms of energy. Further, the proposed Project would incorporate sustainability features to ensure efficient energy use (refer to Section 2.5.1.5, *Sustainability Features*). As such, the proposed Project would not create an impact under criteria (a), (c), or (e) of Appendix F, *Energy Conservation* of the CEQA Guidelines.

The proposed Project would utilize existing electrical and natural gas utilities and would not be likely to require substantial upsizing of existing utilities. As such, the proposed Project would not have a substantial impact on local and regional energy supplies and would not create an impact under criteria (b) of Appendix F, *Energy Conservation* of the CEQA Guidelines.

The proposed Project would be subject to compliance with all State and local energy standards and which would ensure the prevention of wasteful, inefficient, or unnecessary energy consumption. As such, the proposed Project would not create an impact under criteria (d) of Appendix F, *Energy Conservation,* of the CEQA Guidelines.

The proposed Project would represent a very small fraction – far less than 1 percent – of the total fuel consumption of Los Angeles County's over the life of the proposed Project and would not result in a substantial increase in energy demand. Operation of the proposed Project would result in an incremental increase in the daily consumption of vehicle fuel for trips associated with the proposed Project. The proposed Project would not cause wasteful, inefficient, or unnecessary use of transportation energy and would incorporate efficient transportation alternatives. Therefore, the proposed Project would not result in impacts under criteria (f) of Appendix F, *Energy Conservation*, of the CEQA Guidelines.

<u>Impact Description (EN-2)</u>

*b) The project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.*

**EN-2** **The proposed Project – including the Phase 1 preliminary site development plan as well as the Phase 2 development program – would conform with State regulations including the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11) as well as the Redondo Beach and Torrance General Plans, Climate Action Plans, and other applicable local plans for renewable energy and energy efficiency. Therefore, this impact would be *less than significant.***

The proposed Project would support the energy conservation and GHG reduction goals and policies established California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11) as well as the Redondo Beach and Torrance General Plans, Climate Action Plans, and other applicable local plans for renewable energy and energy efficiency. As described in Impact EN-1, the proposed Project includes a number of sustainable features intended to reduce overall energy impacts (refer to Section 2.5.1.5, *Sustainability Features*). For example, the proposed

Project would include the installation of solar on-site photovoltaic systems on between 25-50 percent of the rooftop space developed during Phase 1 and Phase 2. Additionally, the proposed development would include high efficiency HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use (refer to Section 2.8, *Sustainability Features*). New buildings would meet the equivalent of LEED Gold Certification (consistent with Torrance General Plan Community Resource CR.24.1). Implementation of these sustainable design features would reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC. Therefore, implementation of the proposed Project – include the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in a *less than significant* impact.

See Tables 3.7-7 and 3.7-8 in Section 3.7, *Greenhouse Gas Emissions and Climate Change* for a summary consistency with the goals and policies established in the Redondo Beach and the Torrance General Plans and Climate Action Plans.

Cumulative Impacts

The proposed Project, along with other past, present, and future projects in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach would incrementally contribute to the need for regional energy production and distribution facilities. However, as with the proposed Project, all cumulative development would be required to comply with the requirements of the California Building Standards Code, CALGreen, and all applicable local regulations and policies related to energy efficiency. Further, as discussed above, electricity and natural gas facilities are operated and maintained by private utility companies that plan for and accommodate anticipated growth. Electricity and natural gas services are provided upon demand from consumers and expanded as needed to meet demand, consistent with applicable Federal, State, and local with oversight from the CEC and CPUC. The pending closure of the AES

*The pending closure of the AES Redondo Beach Power Plant would not affect system-wide grid reliability and would not contribute to a cumulatively substantial impact on energy in the South Bay.*

Redondo Beach Power Plant would not affect system-wide grid reliability. The AES Redondo Beach Power Plant will continue to serve as a bridge until December 2021 as new procurement comes online including new battery energy storage resources (SWCRB 2020) and AES' Southland Project intended to replace the 1960-era power plants at Alamitos, Huntington Beach, and Redondo Beach that AES bought from SCE. As described in Impact EN-1, implementation of the proposed Project would result in an increase in the energy use at the Project site that would be negligible within the context of regional energy use in the South Bay and would not be wasteful, inefficient, or unnecessary. As described in Impact EN-2, the proposed Project would be consistent with applicable local policies and regulations. Therefore, the proposed Project *would not result in a considerable contribution to cumulatively significant impact* associated with energy use.

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## 3.6 GEOLOGY AND SOILS

This section of the Environmental Impact Report (EIR) describes the existing geology and soils at the Beach Cities Health District (BCHD) campus and within the wider region. These conditions are discussed in the context of potential geologic hazards that could affect the existing proposed re-development of the BCHD campus – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Information for this analysis is based on the Geotechnical Report prepared by Converse Consultants (2016), a Seismic Assessment prepared by Nabih Youssef and Associates Structural Engineers (2018), and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation California Geological Survey (CGS) (previously known as the California Division of Mines and Geology), and California Emergency Management Agency (Cal EMA).

### 3.6.1 Environmental Setting

Regional Geology

The City of Redondo Beach and the City of Torrance are located within the western Coastal Plain of the Los Angeles Basin and the Peninsular Ranges Geomorphic Province in Los Angeles County (U.S. Geological Survey [USGS] 1971). The Los Angeles Basin – bounded by the Transverse Ranges to the north, the Peninsular Ranges to the east, and the continental border to the west – is underlain by both marine and non-marine accumulations of gravel, sand, silt, and clay, that were deposited over time as a consequence of sea level fluctuations and erosion. This western Coastal Plain has been uplifted to form the existing gently rolling topography towards the southeast (City of Redondo Beach 1993).

*The topography within the vicinity of the Project site is generally level with gently rolling hills including the location pictured above along 190th Street, located approximately 0.25 miles north of the Project site.*

Geologic deposits underlying Redondo Beach and Torrance consist predominantly of late Pleistocene to Holocene-age (i.e., 200,000 to 100,000 years old) dune sands located west of the adjacent older alluvial deposits in the inland areas of the Los Angeles Basin. The youngest of these deposits are the El Segundo Sand Hills comprised of Late Pleistocene to Holocene-age sand, silty sand, and silt. The El Segundo Sand Hills parallel the coast for approximately 11 miles from the Ballona Escarpment (a bluff just south of Ballona Creek) to the base of the Palos Verdes Hills, and extend from the coast to between 3 and 6 miles inland. Directly underlying the El Segundo Sand Hills layer is the Upper Pleistocene Lakewood formation, consisting of marine and non-marine derived gravel, sand, silt, and clay (USGS 1971).

Southern California is generally a seismically active (i.e., earthquake prone) region. Faulting and seismicity in Southern California are largely determined by the San Andreas Fault Zone, which extends from Baja California to the Oregon Coast. The San Andreas Fault Zone separates two of the major tectonic plates that comprise the Earth's crust. The Pacific Plate is located west of the San Andreas Fault Zone and moves in a northwesterly direction relative to the North American Plate, which is located east of the San Andreas Fault Zone. This relative movement between the two plates is the driving force of fault ruptures (i.e., earthquakes) in western California. The San Andreas Fault generally trends northwest-southeast. However, north of the Transverse Ranges Province, the fault trends more in an east-west direction – generally known as the Big Bend – causing the fault's right-lateral strike-slip movement, which produces north-south compression between the two plates. This compression has produced rapid uplift of many of the mountain ranges in Southern California.

Faults are generally characterized as active, potentially active, or inactive according to their most recent seismic activity. Active faults are faults that show evidence of surface displacement within the past 11,700 years (i.e., during the Holocene epoch). Potentially active faults are those that show evidence of fault rupture between 11,700 and 2.6 million years ago (i.e., during the Pleistocene epoch).[1] Inactive faults are those without recognized activity within the past 2.6 million years. Buried (i.e., blind) thrust faults are faults that do not have a surface expression but are still a potentially significant source of seismic activity. They are typically defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in Southern California. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake, such as the Northridge Earthquake in 1994, which was produced by the Northridge blind thrust fault (Geotechnologies, Inc. 2019).

[1] Quaternary was previously recognized to extent to 1.6 million years. Recent studies have extended the Quaternary system to 2.588 million years (CGS 2016).

Regional Groundwater Basin

The Los Angeles Coastal Plain is divided into several distinct groundwater basins, which are formed by geologic features such as non-water bearing bedrock, faults, and other features that impede the flow of groundwater. Redondo Beach and Torrance are located within the West Coast Groundwater Basin, a sub-basin of the Los Angles Groundwater Basin. The West Coast Groundwater Basin underlies 160 square miles in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County (see Section 3.9, *Hydrology and Water Quality*).

Project Site Geology

A Geotechnical Report was prepared for the proposed Project by Converse Consultants (2016) (see Appendix G). This investigation included 12 exploratory borings that were drilled to characterize the geologic conditions on the Project site and identify potential geologic hazards such as active or potentially active faults, liquefiable or expansive soils, etc. The existing campus is developed, resulting in a relatively level surface supporting building footprints or pavements (e.g., asphalt surface parking lots, sidewalks, etc.). The elevation of the campus generally ranges from an elevation of approximately 165 feet above mean sea level (MSL) within the central area of the campus, to an elevation of approximately 145 feet MSL at the southern entrance from North Prospect Avenue. The ground level elevation of the Project site is approximately 30 feet higher than the vacant Flagler Lot as well as the residential area to the east along Flagler Lane and Flagler Alley.

*The majority of the Project site is developed with building footprints or pavements and is located on top of an uplifted terrace approximately 30 feet higher than Flagler Lane, Flagler Alley, and Diamond Street (left). The vacant Flagler Lot, located at the northeastern corner of the Project site, is currently undeveloped and is located at a similar grade to Beryl Street and Flagler Lane.*

The vacant Flagler Lot, located in the northeastern corner of the Project site at the intersection of Flagler Lane & Beryl Street has been previously disturbed with the development of an oil and gas well that has previously been plugged and abandoned (see Section 3.8, *Hazards and Hazardous Materials*). Unlike the rest of the Project site, the vacant Flagler Lot is currently undeveloped. The elevation of the Flagler Lot is approximately 130 to 145 feet MSL, with a gentle slope to the northeast.

Based on an analysis of the 12 exploratory borings collected by Converse Consultants (2016), the first 3 feet of the soil beneath the Project site includes asphalt from previous development, beginning with the original development of the former South Bay Hospital in 1958 (refer to Section 2.1, *Introduction*). Existing fill soils placed at the Project site during previous grading activities are encountered from 3 feet to 13 feet below ground surface (bgs) and consist of silty and clayey sand. Underlying subsurface soils consist of alluvial sediments, primarily older dune and drift sand (Converse Consultants 2016).

Project Site Groundwater

In general, groundwater levels fluctuate with the seasons and local zones of perched groundwater may be present at various depths due to local conditions or during rainy seasons. Groundwater conditions at any given location vary depending on numerous factors including seasonal rainfall, local irrigation, and groundwater pumping, among other factors. Groundwater was not encountered in the exploratory borings, which were collected by Converse Consultants (2016) to a maximum depth of 61.5 feet bgs. In accordance with the Seismic Hazard Zone Report for the Redondo Beach Quadrangle (California Department of Conservation Division of Mines and Geology 1998), the historically highest groundwater level is reportedly at depths of greater than 50 feet. For further information regarding groundwater hydrology and groundwater quality (see Section 3.9, *Hydrology and Water Quality*).

Geologic Hazards

*Faults and Fault Rupture*

Fault rupture involves the displacement and cracking of the ground surface along a fault trace. Fault ruptures are visible instances of horizontal or vertical displacement, or a combination of the two typically confined to a narrow zone along the fault. Fault rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (i.e., earthquake hypocenter) is shallow.

As discussed in Section 3.6.2, *Regulatory Setting*, the Alquist-Priolo Earthquake Fault Zoning Act regulates development near active faults to mitigate the hazard of surface fault rupture. The Act requires the State Geologist to establish regulatory zones, also known as Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones, as appropriate. Before a project can be permitted, local agencies must require a site-specific geologic investigation to demonstrate that the proposed buildings would not be constructed across active faults. An evaluation and written geotechnical report must be prepared by a licensed geologist. If an active fault is documented, a structure for human occupancy cannot be placed over the trace of the fault and must be set back – generally 50 feet – from the fault (CGS 2018).

There are no Alquist-Priolo Earthquake Zones within Redondo Beach or Torrance. According to the Earthquake Fault Zone Map for the Redondo Beach Quadrangle Map, the closest Earthquake Fault Zone is associated with the Palos Verdes Fault which is located approximately 3 miles south of the Project site (CGS 2019b). The Palos Verdes Fault is identified as an active fault, meaning it has ruptured in the last 11,000 years; however, it has not yet been zoned by the State of California under the provisions of the Alquist-Priolo Earthquake Fault Zoning Act (Geocon West, Inc. 2016).[2] The Newport Inglewood – Rose Canyon Fault, the designated Alquist-Priolo Earthquake Fault Zone nearest to the Project site, is located approximately 6.3 miles to the northeast (Converse Consultants 2016). Several earthquakes have occurred along the Newport Inglewood – Rose Canyon Fault including the March 10, 1933 Long Beach Earthquake of magnitude 6.4, with its epicenter off Newport Beach, and smaller earthquakes at Inglewood on June 20, 1920 (magnitude 4.9), Gardena on November 14, 1941 (magnitude 5.4). These earthquakes show evidence of right-lateral strike slip focal mechanisms (Converse Consultants 2016).

*Seismicity and Earthquakes*

Seismic ground shaking is defined as motion that occurs as a result of energy released during faulting which could potentially result in the damage or collapse of buildings and other structures, depending on the magnitude of the earthquake, the location of the epicenter, and the character and duration of the ground motion. The composition of the underlying soil and rock, the locations of existing structure, and the building materials used are important details affecting the potential for damage due to seismic ground shaking.

[2] The State of California does not have the funds required to map every potentially dangerous faulting, leaving a number of well-known faults unmapped including several in Los Angeles County. As such, many cities have taken the lead creating their own Alquist-Priolo-like rules for active faults in the area. For example, the City of Torrance has designated a Fault Hazard Management Zone for the Palos Verdes Fault.

Earthquake magnitudes are quantified using the Richter scale, which is a logarithmic scale whereby each whole number increase in magnitude represents a tenfold increase in the amplitude of the seismic wave generated by an earthquake. For example, at a given distance from a fault, the shaking during a magnitude 5.0 earthquake will be 10 times larger than a magnitude 4.0 earthquake while the amount of energy released would increase by a factor of 32. Earthquakes of magnitude 6.0 to 6.9 are classified as moderate, those between 7.0 and 7.9 are classified as major, and those of 8.0 or more are classified as great.

Historically, the Redondo Beach and Torrance have experienced seismic activity from various regional faults. The strongest, most recent regional seismic event was the 6.7 magnitude Northridge Earthquake generated from the Northridge Fault in January 1994. The epicenter of this event was approximately 12 miles northeast of the Project site in Northridge, California. The City of Redondo Beach and the City of Torrance experienced extensive damage from the Northridge Earthquake, particularly from earthquake-induced landslides.

As previously described, the active fault nearest to the Project site is the Palos Verdes Fault, located approximately 3 miles south (see Figure 3.6-1; see Table 3.6-1). The Palos Verdes Fault extends from the Santa Monica-Malibu Coast Fault in northern Santa Monica Bay southeastward across the Palos Verdes Peninsula and the San Pedro Shelf to the vicinity of Lassen Knoll, a distance of more than 50 miles. The location of the Palos Verdes Fault is not precisely known because nearly the entire onshore portion of the fault is covered by development, and the age of the last earthquake along the fault is unknown. Several strands of the fault segments, located offshore of San Pedro and Redondo Beach, are known to cut Holocene deposits (younger than 10,000 to 11,000 years old), and are therefore considered to be active.

The Palos Verdes Fault system is characterized with a right-lateral strike-slip movement with an estimated slip rate of between 1.0 and 5.0 millimeters per year (mm/year) and causing earthquakes up to magnitudes 7.3 (USGS 2017). To address hazards associated with this fault, the Torrance General Plan Safety Element established a Fault Hazard Management Zone for the Palos Verdes Fault. However, the proposed Project site is not included as part of the Fault Hazard Management Zone (City of Torrance 2010).

The Newport – Inglewood Fault is a right-lateral strike-slip fault that extends for approximately 47 miles from Culver City southeast through Inglewood and other coastal communities to Newport Beach at which point the fault extends east-southeast into the Pacific Ocean where it is known as the Rose Canyon Fault. The fault can be inferred on the Earth's surface as passing along and through a line of hills extending from Signal Hill to Culver City. The fault is active and is located

approximately 6.3 miles northeast of the Project site. The fault has a slip rate of approximately 0.6 mm/year and is predicted to be capable of a 6.0 to 7.4 magnitude earthquake.

In addition, there are two major, potentially active buried thrust fault structures in the Los Angeles area: the Elysian Park fold and thrust belt and the Torrance-Wilmington fold and thrust belt (see Table 3.6-2; see Appendix G).

**Table 3.6-1. Active and Potentially Active Faults in the Project Vicinity**

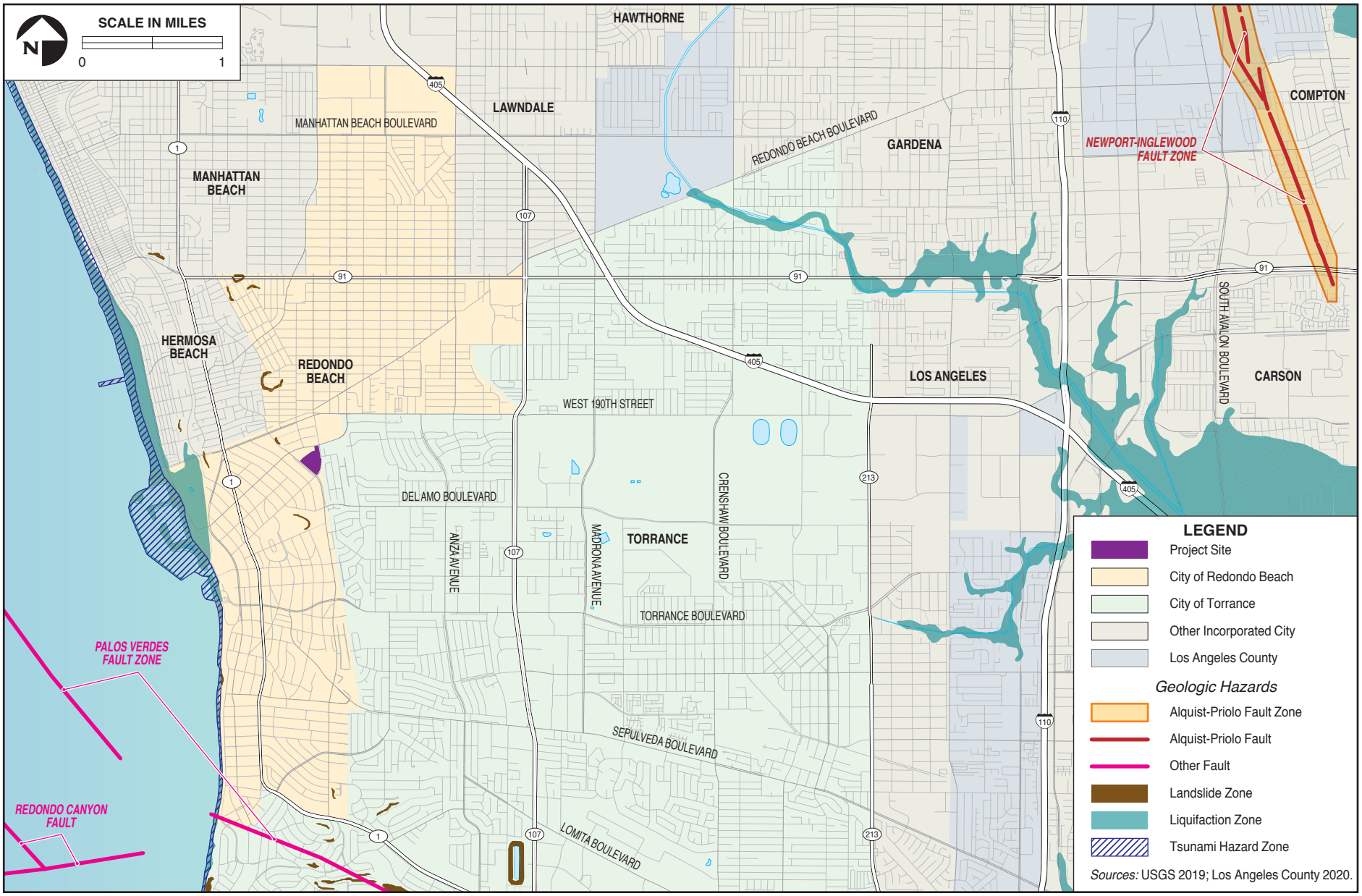
| Fault Name | Distance from Project site | Onshore or Offshore Fault | Estimated Maximum Magnitude |
|---|---|---|---|
| Palos Verdes Fault | 3.0 miles to the south | Onshore/Offshore | 7.3 |
| Newport-Inglewood Fault | 6.3 miles to the northeast | Onshore | 7.1 |
| Puente Hills | 13.8 miles to the east | Onshore | 6.6 |
| Santa Monica Fault | 14.4 miles to the northwest | Onshore/Offshore | 6.6 |
| Elysian Park Thrust | 16.0 miles to the northeast | Onshore | 6.7 |
| Hollywood Fault | 16.1 miles to the north | Onshore | 6.4 |
| Malibu Coast | 20.3 miles to the northwest | Onshore/Offshore | 6.7 |
| Raymond Fault | 20.4 miles to the north | Onshore | 6.5 |
| Whittier Fault | 21.4 miles to the northeast | Onshore | 6.8 |
| Verdugo Fault | 22.1 miles to the northeast | Onshore | 6.9 |
| Anacapa-Dume Fault | 24.3 miles to the northwest | Offshore | 7.5 |
| San Gabriel Fault System | 31.0 miles to the northeast | Onshore | N/A |
| San Andreas Fault System | 50.1 miles to the northeast | Onshore | 7.8 |

Source: City of Torrance 2010.

**Table 3.6-2. Buried Thrust Fault Related Earthquakes in the Los Angeles Area**

| Buried Thrust Fault | Earthquake | Date of Earthquake | Magnitude |
|---|---|---|---|
| Elysian Park | Whittier Narrows Earthquake | October 1, 1987 | 5.9 |
| Torrance-Wilmington | Malibu Earthquake | January 19,1989 | 5.0 |
| Unidentified Buried Thrust Fault | Northridge Earthquake | January 17, 1995 | 6.7 |

Source: City of Torrance 2010.




wood.

**Geologic Hazards**

**FIGURE 3.6-1**

In the event of an earthquake along any of the faults listed in Table 3.6-1, the South Bay (including Redondo Beach and Torrance) would be subject to high-frequency strong ground motions with potential horizontal ground accelerations of up to 1.01g,[3] which could potentially result in damage, particularly to older buildings and infrastructure, liquefaction, and risk to human health (City of Torrance 2010). Many older buildings constructed before 1996, including the existing development on the campus, do not meet current California Building Code (CBC) standards and are more likely to sustain significant damage during a seismic event and the aftershocks that follow. In cases of moderate to major earthquakes failures in older buildings' structural systems could cause significant damage. The Beach Cities Health Center, formerly the South Bay Hospital, is a 60-year-old, non-ductile concrete building. The original 4-story (north) tower was constructed in 1958 and the 4-story addition (south tower) was constructed in 1967. Both of these towers were constructed with non-ductile concrete roofs, floors, and poorly reinforced columns, making them susceptible to collapse in the event of an earthquake. A Seismic Assessment prepared by Nabih Youssef Associates (2018) concluded that the original north tower and south tower addition of the Beach Cities Health Center have numerous seismic deficiencies (e.g., brittle concrete columns result from poor steel design) and require extensive seismic upgrades. In particular, the structural foundations of the building, concrete walls (north tower), and interior columns of the building require strengthening. Additionally, the building requires new exterior steel braced frames (south tower) (Nabih Youssef Associates 2018). The Beach Cities Advanced Imaging Building (510 North Prospect Avenue), which was constructed in 1976 is subject to similar deficiencies (refer to Section 2.1, *Introduction*).

The Redondo Beach General Plan Environmental Hazards / Natural Hazards Element (1993) identifies types of hazardous buildings that would be of concern during an earthquake (i.e., non-ductile concrete frame buildings). The Element also identifies critical facilities (i.e., facilities whose continued functioning is necessary to maintain public health and safety following a natural disaster), sensitive facilities (e.g., housing for the elderly, handicapped, and mentally ill), and high-occupancy facilities (e.g., housing) that pose a greater degree of importance for or risk to the public, and may warrant special standards or protection from seismic-related impacts or damage. The Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan, adopted in 2020, identifies the Providence Family Medical Center and the Beach Cities Health Center on the campus as critical facilities (City of Redondo Beach ~~2019~~2020). The Torrance General Plan Safety Element (2010) also identifies unreinforced masonry buildings as most susceptible to seismic-related damage. Torrance adopted a mandatory retrofit seismic ordinance (Torrance Municipal Code [TMC]

[3] G-force is a unit of force equal to the force exerted by gravity and is used to indicate the force to which a body is subjected when it is accelerated, in this case from seismic ground shaking.

Division 2 Chapter 6) in 1987 and used subsidies to prioritize the retrofit of older buildings, especially unreinforced masonry buildings that needed to be reinforced and strengthened. As a result, most of the unreinforced masonry buildings in Torrance have been brought into compliance with Torrance's mandatory strengthening requirements (City of Torrance 2010).

In October 2015, the City of Los Angeles adopted Ordinance 183893 requiring Mandatory Earthquake Hazard Reduction in Existing Non-Ductile Concrete Buildings (Section 2, Division 95, or Article 1 of Chapter IX of the Los Angeles Municipal Code). Although neither Redondo Beach nor Torrance have adopted a similar ordinance, the seismic hazard presented by the present condition of the Beach Cities Health Center warrants significant hazard reduction measures. As previously describe, the proposed Project would address these hazards by demolishing the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, because the work needed to implement a proper seismic retrofit are financially infeasible (refer to Section 1, *Introduction*).

*Liquefaction and Lateral Spreading*

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction is defined as the transformation of a granular material from a solid state into a liquefied state as a consequence of increased pore pressure, which results in the loss of grain-to-grain contact (Converse Consultants 2016). Unconsolidated silts, sands, and silty sands are most susceptible to liquefaction. Almost any saturated granular soil can induce an increase in pore water pressures when shaken, and subsequently, these excess pore water pressures can lead to liquefaction if the intensity and duration of earthquake shaking are great enough.

According to the Redondo Beach Quadrangle Seismic Hazard Zones Map, the Project site is not located within an area where historic occurrence of liquefaction or geological, geotechnical, and high groundwater conditions indicate a potential for permanent ground failure due to liquefaction (CGS 1999). The Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan maps liquefaction zones along coastline stretching from the waterline inland as far as North Francisca Avenue at the widest point, a distance of approximately 2,150 feet inland. The remainder of the liquefaction zone reaches approximately 1,000 feet inland from the coast. The Project site is located well outside of these liquefaction zones (City of Redondo Beach ~~2019~~2020). The Geotechnical Report prepared for the proposed Project determined that the absence of shallow groundwater and relatively dense soils indicate the Project site is not susceptible to liquefaction (Converse Consultants 2016).

In addition, lateral spreading can occur when potentially liquefiable soils are present and exposed in conjunction with a sloping ground surface. If liquefiable soils in the slope are continuous, the toe of the slope is unsupported, and the soils liquefy, the result may be temporary instability resulting in movement of sediments on the slope, causing slope failure. While the Project site includes sloping ground surfaces at the vacant Flagler Lot and along the eastern boundary of the Project site, there are no liquefiable soils underlying the Project site. Therefore, the potential for lateral spreading at the Project site is considered to be negligible (Converse Consultants 2016).

*Landslides and Slope Instability*

The stability of slopes is affected by gravity, rock and soil type, and amount of water and vegetation present. Events that can cause a slope to fail include but are not limited to sudden movements, such as those during a seismic event, modification of the slope by natural processes or human activities, undercutting caused by erosion, and changes in hydrologic characteristics (California Department of Transportation [Caltrans] ~~2001~~2020). The Seismic Hazards Maps prepared by CGS indicate the Project site is not located within an *"Earthquake Induced Landslide"* zone (CGS 2019a). The nearest areas to the Project site that are designated within a landslide zone are an area developed as multi-family residences east of North Prospect Avenue, approximately 1,100 feet to the northwest and Redondo Beach High School, approximately 1,800 feet to the southwest. The Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan also maps the area beneath Redondo Beach High School as a landslide zone (City of Redondo Beach ~~2019~~2020).

*Tsunamis and Seiches*

A tsunami is a wave or surge most commonly caused by an earthquake beneath the sea floor. The Project site is located outside of a mapped Tsunami Inundation Area as mapped by the California Official Tsunami Inundation Maps (CGS 2009) and the Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan (City of Redondo Beach ~~2019~~2020). Therefore, the Project site would not likely be affected by a tsunami. (For issues associated with emergency evacuation and/or emergency access see Section 3.8, *Hazards and Hazardous Materials.*) Seiches are large waves generated in enclosed bodies of water in response to ground shaking. Based on the location of the Project site away from lakes and reservoirs, seiches do not pose a hazard (Converse Consultants 2016).

Soils and Surface Hazards

Many of the properties, including the Project site, have been previously developed and are underlain by a layer of fill soils with native soils underneath. These soils and surfaces can be subject to risk from hazards related to erosion, expansion, subsidence, settlement, consolidation

(including hydroconsolidation[4]), and/or collapse. These hazards can result from the nature of the soils themselves, physical site conditions, or the presence of groundwater.

*Erosion Susceptibility*

Erosion of exposed soils and rocks occurs naturally as a result of physical weathering caused by water and wind energy. Currently, the Project site is developed and most of the land surface is covered by impervious materials such as buildings, asphalt pavements (e.g., surface parking lots), concrete (e.g., sidewalks). The only exception is the vacant Flagler Lot, which is currently undeveloped and characterized by exposed gravel and dirt. Therefore, minimal area of exposed soils and the moderately sloped nature of the Project site, the potential for substantial erosion hazards is low.

*Expansive Soils*

Expansive soils consist largely of clays, which can greatly increase in volume when saturated with water and shrink when dried. The potential for soil to undergo shrink and swell is greatly enhanced by the presence of a fluctuating, shallow groundwater table. Expansive soils tend to swell with seasonal increases in soil moisture in the winter months and shrink as soils become drier in the summer months. Repeated shrinking and swelling of the soil can lead to stress and damage of structures, foundations, fill slopes, and other associated facilities (CGS 1998).

As previously described, the Project site is located above silty and clayey sand earth materials. However, the Expansion Index tests conducted on soil samples collected from the Project site yielded a value of 0-1 (very low). Therefore, the Geotechnical Report concluded that the soils underlying the Project site have a very low potential for expansion (Converse Consultants 2016).

*Subsidence*

Subsidence is the downward shift of the ground surface and is most frequently caused by subsurface withdrawal of water (i.e., groundwater drawdown), oil, or natural gas earth extraction (e.g., subsurface mining), faulting, or seasonal changes in soil moisture. Compaction of soils in some aquifer systems can accompany excessive groundwater pumping and is the largest cause of subsidence in the region (City of Redondo Beach 1993).

Historically, hydrostatic pressure in the West Coast Groundwater Basin confined aquifers was sufficient to maintain a freshwater outflow to the ocean and prevent seawater intrusion. Prior to

[4] Hydroconsolidation, commonly referred to as soil collapse, is a common problem in Southern California. This happens when wetted, collapsible soils undergo a rearrangement of their grains and the water removes the cementing material, causing rapid, significant settlement

the 1953, an almost total dependence on groundwater to meet water demand resulted in a serious overdraft of the Basin, resulting in seawater intrusion and higher risk of subsidence. The West Coast Basin Barrier Project, which started in 1953, prevents subsidence by injecting water into sea barriers, which prevents seawater intrusion and replenishes the groundwater basin. Additionally, operation of the Torrance Oil Field, which underlies portions of the City of Redondo Beach and the City of Torrance – including the Project site (see Section 3.8, *Hazards and Hazardous Materials*) – had a peak production from approximately 82 active on- and off-shore wells from 1925 to 1956. However, subsidence from hydrocarbon withdrawal is considered to have been negligible (City of Redondo Beach 1993). Additionally, based on the substantial depth to groundwater greater than 61.5 feet bgs, the risk of subsidence on-site is considered very low (Converse Consultants 2016).

*Differential Settlement*

Differential settlement is the process whereby soils settle non-uniformly, potentially resulting in stress and damage to utility pipelines, building foundations, or other overlying structures. Such movement can occur in the absence of seismically induced ground failure, due to improper grading and soil compaction or discontinuity of underlying fill and naturally occurring soils. Strong ground shaking often greatly exacerbates soil conditions already prone to differential settlement, resulting in distress to overlying structures. Elongated structures, such as pipelines, are especially susceptible to damage as a result of differential settlement.

The risk of differential settlement is considered to be low at the Project site and in the surrounding vicinity. Some seismically induced settlement (i.e., approximately 0.5 inches) of the Project site should be expected as a result of strong ground-shaking; however, the Geotechnical Report concluded that the absence of shallow groundwater and relatively dense soils indicate differential settlement to be less than 0.25 inches over a distance of 30 feet (Converse Consultants 2016).

Paleontological Resources

Significant paleontological resources include fossils and fossiliferous deposits such as identifiable vertebrate fossils, uncommon invertebrate, plant, and trace fossils, and other data that provide information regarding the preservation, biochronology, and paleoecology of past life on Earth (Society of Vertebrate Paleontology [SVP] 2010). The potential to encounter paleontological resources is based on the geologic unit, and array of fossil resources known to be contained within that unit, within which excavations would occur. The Project site is located in an area that has been regionally mapped as underlain by Pleistocene-aged, stabilized dune and drift sand (Converse Consultants 2016). Exploratory borings at the Project site identified the presence of recent artificial

fills (Qaf) up to 13 feet below existing grade underlain by Quaternary-aged alluvium (Qal) composed of dune and drift sand (Converse Consultants 2016). Recent artificial fills are typically too young to contain fossil resources; however, Pleistocene-aged units are sufficiently old to preserve fossil resources.

Pleistocene-aged geologic deposits have an unpredictable potential for containing fossil resources including significant locations that produce large numbers of fossils (i.e., bonebeds or trackways) as well as broad swaths where no resources are uncovered during extensive excavations. For instance, a search of the University of California Museum of Paleontology (UCMP) online locality database for Pleistocene-aged[5] paleontological localities in Los Angeles County recorded a total of 12,357 entries. However, of these entries 11,796 are associated with Rancho La Brea (commonly known as the La Brea Tar Pits) and 553 are associated with the marine deposits of the San Pedro Formation in the vicinity of San Pedro. Only 2 entries are associated with the Palos Verde sand and only 2 entries are associated with the unnamed Pleistocene-aged deposits ranging from Signal Hill to Timm's Point (UCMP 2020). Therefore, based on the distance from known high density paleontological resources localities and no known localities recorded during previous construction at the campus, Quaternary-aged alluvium deposits within the Project site can be expected to have a low potential for containing fossil resources.

### 3.6.2 Regulatory Setting

Federal Regulations

*Earthquake Hazards Reduction Act*

The purpose of the Earthquake Hazards Reduction Act is to reduce the risks to life and property from future earthquakes in the U.S. through establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this, the Act established the National Earthquake Hazards Reduction Program (NERHP). The NERHP was amended in November 2004 by refining the description of agency responsibilities, program goals, and objectives.

*Clean Water Act Section 402 (National Pollutant Discharge Elimination System Program)*

Clean Water Act (CWA) Section 402 mandates that certain types of construction activities comply with the requirements of the U.S. Environmental Protection Agency's (USEPA's) National Pollutant Discharge Elimination System (NPDES) program. Under State Water Resources Control Board (SWRCB) enforcement, the Los Angeles Regional Water Quality Control Board (RWQCB)

[5] Geologic units deposited prior to the Quaternary-aged alluvium deposit identified at the site were not assessed as they are unlikely to be encountered during implementation of the proposed Project.

implements the NPDES program in Los Angeles County. The program requires a General Construction Activities Permit, including implementation of established Best Management Practices (BMPs) for management of stormwater, erosion control, and/or siltation. More information regarding the NPDES program is provided in Section 3.9, *Hydrology and Water Quality*.

State Regulations

*Alquist-Priolo Earthquake Fault Zoning Act*

The Alquist-Priolo Earthquake Fault Zoning Act addresses the hazard of surface fault rupture only, and is not directed toward other earthquake hazards. Local cities and counties must regulate certain development projects within the Earthquake Fault Zones, generally by issuing building permits only after geologic investigations demonstrate that development sites are not threatened by future surface displacement. A buffer prohibiting the construction of structures for human occupancy in proximity to an active fault may be established. Typically, structures for human occupancy are not allowed within 50 feet of the trace of an active fault. Projects subject to these regulations include all land subdivisions and most buildings intended for human occupancy.

*California Building Code*

The State of California provides a minimum standard for building design through the CBC, which is based on the Uniform Building Code (UBC) but has been modified to account for California's unique geologic conditions. All provisions of the CBC are uniformly applicable throughout the State of California, except where they may be made even stricter by local jurisdictions, based on local conditions. Chapter 16 of the CBC contains specific requirements for seismic safety. Chapter 18 of the CBC regulates excavation, foundations, and retaining walls. Chapter 33 of the CBC contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Appendix J of the CBC regulates grading activities, including drainage and erosion control. Both the Redondo Beach and Torrance have adopted the CBC.

*Seismic Hazards Mapping Act*

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate *"seismic hazard zones."* Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the project site are investigated and appropriate mitigation

measures, if any, are incorporated into development plans. The Project site is located within the seismic hazard zone for the Redondo Beach Quadrangle (CGS 1999).

The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourages land use management policies and regulations to reduce and mitigate those hazards in order to protect public health and safety. Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

*South Coast Air Quality Management District Rule 403 Fugitive Dust*

To address the effects of wind erosion, the South Coast Air Quality Management District (SCAQMD) Rule 403 requires the implementation of best available fugitive dust control measures (e.g., limiting vehicle speeds to 15 miles per hour [mph] on unpaved roads, wiping down construction equipment before leaving a site, etc.) during active operations capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads.

<u>City of Redondo Beach Local Policies and Regulations</u>

*Redondo Beach General Plan Environmental Hazards / Natural Hazards Element*

The Redondo Beach Environmental Hazards / Natural Hazards Element describes seismic-related problems associated with existing older structures and provides recommendations for new development (City of Redondo Beach 1993). The Environmental Hazards / Natural Hazards Element requires developers to submit a geotechnical report before starting construction on new buildings, as part of the environmental and development review process. The Environmental Hazards / Natural Hazards Element identifies damages that earthquakes may cause to buildings that contain people or essential functions as a principal threat. This element also identifies non-ductile concrete frame building as hazardous buildings of particular concern, noting concrete roof systems supported on non-ductile concrete columns as hazardous features. The geotechnical report must be submitted to the City for review and approval before a grading or building permit can be issued by the City for the project. The standards for data and analysis that must be included in the geotechnical report must demonstrate compliance with applicable CBC regulations and standards for review set forth by the California Geological Survey Special Publication 117 Guidelines for Evaluating and Mitigating Seismic Hazards in California. The Environmental Hazards / Natural

Hazards Element provides the following goals and policies addressing issues of protecting the public from earthquake and landslide hazards and minimizing the impact of strong ground motion, liquefaction, and fault rupture.

Objective 9.1: Substantially reduce the level of death, injury, property damage, economic and social dislocation and disruption of vital services that would result from earthquake damage and related seismic events; and to ensure the widespread availability and effective response of emergency evacuation, and disaster relief services throughout the community following an earthquake (seismic) event.

Policy 9.2.2 Periodically review and assess current formats and guidelines required for geotechnical reports and environmental impact reports prepared and submitted to the City for proposed development projects, particularly locations within high liquefaction areas, to assure their continued adequacy and comprehensiveness.

Policy 9.2.3 Monitor and evaluate existing grading standards, slope retainage standards, and erosion control mitigation measures required and implemented by the City in local development and construction projects to ensure their continued adequacy and success relative to seismic safety.

Policy 9.4.1 Maintain the existing high standards of performance currently enforced in the City for existing buildings and construction techniques of new buildings relative to potential strong ground motion and shaking that may be caused in the local area by an earthquake event.

Objective 9.6: Take all necessary and appropriate actions in the siting, maintenance, and operation of critical and sensitive facilities in the community, to ensure, as much as possible, that these facilities continue to operate safely and successfully both during and after an earthquake event.

Policy 9.6.1 Require that earthquake survival and efficient post-disaster functioning be a primary concern in the siting, design, and construction standards for essential critical facilities in the City.

Policy 9.6.2 Require that proposed Critical, Sensitive, and High-Occupancy facilities be subject to careful and rigorous standards of seismic

review prior to any local approvals or permits, including detailed site investigations for faulting, liquefaction and ground motion characteristics, and application of the most current professional standards for seismic design.

Policy 9.6.3 Prohibit the location of any Sensitive and High-Occupancy facilities within one hundred (100) feet of an active or potentially active local fault or fault system.

Policy 9.6.4 Attempt, wherever possible, to locate Critical and Sensitive structures in areas of the City with continuous road access, and areas where utility services can be easily maintained and/or quickly reinstated in the event of an earthquake.

Policy 9.6.5 Require that existing Critical and Sensitive facilities with significant seismic vulnerabilities be upgraded, relocated, or phased out as appropriate or possible.

Policy 9.6.6 Incorporate planning for potential geologic or seismic-related incidents affecting Critical, Sensitive, and High-Occupancy facilities into the City's contingency plans for disaster response, evacuation, and recovery.

Policy 9.6.7 Require all Critical, Sensitive, and High-Occupancy facilities located in areas of potential seismic-related hazards (particularly liquefaction or tsunami) to maintain site-specific emergency response plans, with contingencies for all appropriate geologic and seismic-related hazards.

*Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan*

The City of Redondo Beach began the process of updating its Local Hazard Mitigation Plan in early 2018. The City assembled a Hazard Mitigation Planning Committee, which included representatives from the public safety departments (i.e., fire and police) and other City departments including building, planning, and public works, and a series of meetings were held that guided the overall development of the ~~Draft~~ Local Hazard Mitigation Plan. This plan is intended to help create a safer community for residents, businesses, and visitors. The plan allows public safety officials and City staff, elected officials, and members of the public understand the threats from natural and human-caused hazards in the community. The plan also recommends specific actions to proactively decrease these threats before disasters occur. The Redondo Beach ~~Draft~~ Local Hazard

Mitigation Plan ~~was published on August 8, 2019 and~~ includes four main sections in addition to an introduction, community profile, and reference section:

1. ~~A summary of the natural and human-caused hazards that pose a risk to the community. This will include descriptions of past disaster events and the chances these disasters may occur in the future.~~**Hazard Assessment.** Summarizes the various hazard conditions in Redondo Beach, their history, the risk of future occurrence, and any effects of climate change on their frequency and intensity. It also discusses how hazards were selected and prioritized for inclusion in this plan.
2. ~~An assessment of the threat to the City of Redondo Beach, which will describe how the community is vulnerable to future disasters. The plan will look at the threat to important buildings and infrastructure, such as police and fire stations, roads, and utility lines. It will also look at the threat to community members, particularly disadvantaged persons.~~ **Threat Assessment.** This chapter discusses the threat to community members, buildings, and infrastructure posed by individual hazard types. It also summarizes the methods and approach used to prepare the threat assessment.
3. ~~A hazard mitigation strategy, which will lay out specific policy recommendations for the City to carry out over the next 5 years. These recommendations will help reduce the threat that the community faces from hazard events.~~**Hazard Mitigation Strategy.** This chapter contains specific hazard mitigation actions to improve resiliency in Redondo Beach, and a discussion of how the mitigation actions were developed.
4. ~~A section on maintaining the plan, which will help ensure that the Local Hazard Mitigation Plan is kept up to date. This will make it easier for the City to continue to proactively protect itself and will also keep the City eligible for additional funding.~~ **Plan Maintenance.** This chapter discusses how the plan will be implemented and summarizes how Redondo Beach can monitor and update the plan in future years.

*Redondo Beach Municipal Code*

Redondo Beach Municipal Code (RBMC) Section 5-7.113 requires planning priority projects to prepare and submit a SUSMP to the City's Engineer for review and approval. The Standard Urban Stormwater Mitigation Plan (SUSMP) shall also contain low impact development (LID) requirements consistent with Parts VI.D.7.c and VI.D.7.d(iii) of the Municipal NPDES Permit. The provisions of this section establish requirements for construction activities and facility operations of development and redevelopment projects to comply with the current Municipal NPDES Permit to minimize potential water quality impacts, including soil erosion, from development.

City of Torrance Local Policies and Regulations

*Torrance General Plan Safety Element*

The Torrance General Plan Safety Element contains goals and policies aimed at reducing the risk of natural disasters and anthropogenic (i.e., human-made) hazards. The basic objective of the Safety Element is to reduce death, injuries, property damage, and economic and social impact from hazards. The Safety Element provides the following goals and policies addressing issues of protecting the public from earthquake and landslide hazards and minimizing the impact of strong ground motion, liquefaction, and fault rupture:

Objective S.1: To protect the community from hazards related to earthquakes, seismic-related activity, and flooding.

Policy S.1.2 Reduce the risk associated with structures which would likely be seriously damaged during a major earthquake, such as those located in high-risk seismic areas and buildings that do not meet current seismic codes.

Policy S.1.4 Require increased levels of structural protection for critical facilities such as hospitals, police and fire facilities, communication and emergency operations centers, and places of community assembly.

*Draft Local Hazard Mitigation Plan*

The Torrance Local Hazard Mitigation Plan is a blueprint for how the City of Torrance may reduce the threat posed by natural hazards. This plan is intended to help make Torrance a safer place to live, work, and visit by identifying effective and feasible actions to reduce the risks posed by various hazards (i.e., drought, seismic hazards, extreme weather, hazardous materials, flood, diseases and pest management, and geologic hazards). The City of Torrance established goals for the plan as part of the planning process to develop its previous Local Hazard Mitigation Plan, which was adopted in 2004. The planning team modified these goals for Torrance Draft Local Hazard Mitigation Plan, which was published in September 2016:

- Make properties and structures more resilient to natural hazards, reducing injuries and damage.
- Improve assessments of hazards to encourage preventive measures.
- Create outreach and education efforts to increase public awareness of risks.
- Support the local environment through hazard mitigation planning efforts.

- Improve public and private participation to encourage leadership and prioritize hazard mitigation actions.
- Coordinate hazard planning and emergency operations by strengthening collaboration.

*Torrance Municipal Code*

Section 81.2.5 – Grading Permit Requirements: The City of Torrance adds to the CBC with grading and permit requirements. Each application for a grading or paving permit shall be accompanied by two sets of plans and specifications and, when required, supporting data consisting of, but not limited to, a geotechnical report, engineering geology report, drainage report, and hillside landscape report to incorporate erosion control. This section also includes requirements for the geotechnical report, engineering geology report, drainage report, and hillside landscape report.

Section 26 – Seismic Safety Building Rehabilitation Bond Procedural Ordinance: The City of Torrance's Seismic Safety Building Rehabilitation Bond Procedural Ordinance, adopted in February 1988, issued the first Special Assessment bond to finance the retrofit of privately owned hazardous structures. The Special Assessment program is one of two incentives provided to owners of hazardous structures. The second, a subsidy to pay for engineering analysis, was used by owners of more than half of the City's unreinforced masonry parcels. To date, Torrance has seen 43 of its 50 identified unreinforced masonry parcels retrofitted.

### 3.6.3 Impact Assessment and Methodology

Thresholds of Significance

The following thresholds of significance are based on Appendix G of the 2020 California Environmental Quality Act (CEQA) Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse geological impact if it would do any of the following:

a) The project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:
    i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;

ii. Strong seismic ground shaking;
iii. Seismic-related ground failure, including liquefaction; or
iv. Landslides.

b) The project would result in substantial soil erosion or the loss of topsoil.
c) The project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
d) The project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
e) The project would have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
f) The project would directly or indirectly destroy a unique paleontological or site or unique geologic feature.

*Screened-Out Threshold(s):*

- Threshold (a.i) (*Fault Rupture*): Based on the Redondo Beach Quadrangle Seismic Hazard Zone Map and the Geotechnical Report prepared by Converse Consultants (2016). The fault located nearest to the Project site is the Palos Verdes Fault, located approximately 3 miles to the south of the Project site. While the proposed Project may be subject to seismic shaking from nearby faults, the proposed Project would not be subject to rupture along a fault that traverses the Project site. Therefore, for the reasons stated above and as discussed in Section VII, *Geology and Soils* of the Initial Study (IS), this issue will not be analyzed further in this EIR.
- Threshold (e) (*Septic Systems*): The proposed Project would not involve the use or development of on-site wastewater treatment systems, such as septic tanks or alternative wastewater disposal systems, because sewers are available for the disposal of wastewater at the Project site (see Section 3.15, *Utilities and Service Systems*). The proposed Project would not result in impacts related to the capability of soils for supporting septic systems or alternative wastewater disposal systems. Therefore, for the reasons stated above and as discussed in Section VII, *Geology and Soils* of the IS, this issue will not be analyzed further in this EIR.

Methodology

*Geology and Soils*

The impact analysis for geology and soils focuses on the potential for the proposed Project to cause or increase the risk for geologic hazards including but not limited to seismicity and soil stability. As previously described, this analysis relies on a Geotechnical Report prepared by Converse Consultants (2016) and a Seismic Assessment prepared by Nabih Youssef and Associates Structural Engineers (2018) as well as other sources of publicly available information including the Environmental Hazards/Natural Hazards Element of the City of Redondo Beach General Plan (1993), Safety Element of the City of Torrance General Plan (2010), Southern California Earthquake Data Center, CGS, and Cal EMA.

Regional and on-site geologic and soil conditions were compared to relative risk of potential geologic hazards under the proposed Project, which could affect the Project site and/or the surrounding community.

*Paleontological Resources*

The analysis of paleontological resources is based on a review of the UCMP paleontological records search results as well as geologic map and literature review including the site-specific Geotechnical Report prepared for the proposed Project (Converse Consultants 2016). The objective of the analysis was to determine the geological formations underlying the Project site, whether any paleontological localities have previously been identified within the Project site or in the same or similar formations near the Project site, and the potential for excavations associated with the proposed Project to encounter paleontological resources. These methods are consistent with the SVP guidelines for assessing the potential for paleontological resources to occur in individual geologic units (SVP 2010).

As described further in Impact GEO-4, although no known paleontological resources were identified within the Project site from the UCMP search, this does not preclude the existence of previously unknown buried paleontological resources within the Project site that may be impacted during construction of the proposed Project.

### 3.6.4 Project Impacts and Mitigation Measures

Impact Description (GEO-1)

a) *The project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:*

*ii. Strong seismic ground shaking;*

*iii. Seismic-related ground failure, including liquefaction; or*

*iv. Landslides.*

**GEO-1 Compliance with all applicable State and local regulations as well as the recommendations of the Geotechnical Report would ensure that the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. Potential impacts would be *less than significant with mitigation*.**

*Strong Seismic Shaking*

As previously described, the Project site is located within the seismically active region of Southern California. During an earthquake along any of the nearby faults (e.g., Palos Verdes Fault and Newport – Inglewood Fault), strong seismic ground-shaking has the potential to affect the existing buildings located at the Project site – including the Beach Cities Health Center and to a lesser extent the Beach Cities Advanced Imagining Building, which do not meet the most recent seismic requirements included in Chapter 16 of the CBC. Phase 1 of the proposed Project would demolish the Beach Cities Health Center and eliminate the need for ongoing seismic-related structural maintenance as well as the potential for catastrophic seismic failure or collapse during an earthquake event (refer to Section 2.4.3, *Project Objectives*). This would also eliminate seismic hazards in an identified critical and sensitive facility, in support of Redondo Beach Environmental Hazards / Natural Hazards Element Policy 9.6.5. Similarly, the potential demolition of the Beach Cities Advanced Imagine Building during Phase 2 would also accomplish these goals. As such, the implementation of the proposed Project would have a *beneficial impact* related to the elimination of geologic hazards.

Development under the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would also be subject to strong seismic ground-shaking during an earthquake event. However, unlike the existing buildings on the Project site, the proposed development would comply with the latest State and local building standards including Chapter 16 of the CBC (as adopted by the RBMC and the TMC), which contains specific requirements for seismic safety (refer to Section 3.6.2, *Regulatory Setting*). The Geotechnical Report prepared by Converse Consultants (2016), which evaluates site-specific geologic hazards including strong seismic ground-shaking (Converse Consultants 2016), confirmed that the

proposed development would be capable of withstanding lateral ground movement from an earthquake provided that it incorporates all appropriate earthwork and site grading, design, and construction recommendations (Converse Consultants 2016). Therefore, compliance with all applicable State and local building standards as well as the implementation of Mitigation Measure (MM) GEO-1, which would ensure the incorporation of all appropriate earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report, would not exacerbate and would reduce potentially significant impacts from strong seismic ground-shaking to *less than significant with mitigation*.

*Liquefaction*

As previously described, according to the State of California Seismic Hazards Map the Project site is not located within a designated liquefiable area (CGS 2019a). Similarly, according to the Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan Liquefaction Zones Map the Project site is not located in an area that is at risk for liquefaction (City of Redondo Beach ~~2019~~2020). The Geotechnical Report prepared for the proposed Project also categorizes the underlying soils as silty and clayey sands with low risk of liquefaction. Therefore, required compliance with the CBC would ensure that potential impacts associated with liquefaction would be *less than significant*.

*Landslides*

As previously described, according to the CGS Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone (CGS 2019a). Similarly, according to the Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides (City of Redondo Beach ~~2019~~2020). Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very low (Converse Consultants 2016). Therefore, required compliance with the CBC would ensure that potential impacts associated with landslides would be *less than significant*.

Mitigation Measure (MM)

***MM GEO-1*** ***Geotechnical Report Recommendations.*** *The proposed Project shall comply with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the proposed Project. ~~These recommendations shall be reviewed by~~ The Beach Cities Health District (BCHD) shall incorporate these recommendations into all final grading plans, design*

*drawings, and construction plans, as appropriate, prior to the issuance of any demolition or grading permits and shall submit the appropriate plans to the City of Redondo Beach and the City of Torrance Building & Safety Divisions ~~and formalized on all final grading plans, design drawings, and construction plans, as appropriate,~~ prior to the issuance of any demolition or grading permits. City of Redondo Beach and City of Torrance permit compliance staff shall review all final grading plans, design drawings, and construction plans, as appropriate, and observe earthwork and grading to ensure compliance with these recommendations and specifications ~~during grading and construction activities associated with the proposed Project~~.*

Residual Impacts

The CBC (as adopted by the RBMC and TMC) includes comprehensive requirements and standards to ensure that all development is constructed to provide the maximum level of protection feasible and minimize the risk to life and property. Accordingly, required compliance with the CBC along with the implementation of the recommendations in the Geotechnical Report prepared for the proposed Project would reduce the risk of potential impacts associated with geologic hazards to *less than significant*. However, it should be noted that although the occurrence probability of a larger-than-expected seismic event with corresponding ground acceleration is low, it is not zero. Consequently, while impacts associated with geologic hazards would be *less than significant*, any structure built in Southern California, regardless of compliance with the CBC, is susceptible to failure during larger-than-expected seismic events.

Impact Description (GEO-2)

*b) The project would result in substantial soil erosion or the loss of topsoil.*

**GEO-2 The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would redevelop the existing Beach Cities Health District (BCHD) campus. The proposed Project would not result in substantial soil erosion or the loss of topsoil. While the construction of the proposed Project would involve excavation of soils and grading, compliance with applicable State and local regulations would ensure potential impacts would be *less than significant*.**

As described in Section 2.2.3, *Existing Project Site*, the Project site consists of the existing 9.35-acre campus and the adjacent 0.43-acre vacant Flagler Lot at the corner of Flagler Lane and Beryl Street. The existing BCHD campus is nearly entirely developed with existing building footprints

and pavements. The vacant Flagler Lot has been previously disturbed, but unlike the rest of the existing Project site is currently undeveloped with exposed gravel and direct.

Construction of the proposed Project would involve the excavation of substantial amounts of soil. As described in Section 2.5.1.6, *Construction Activities*, Phase 1 would involve the excavation of approximately 20,000 cubic yards (cy) of soil, in order to facilitate construction of the proposed subterranean service area and loading dock. Additional grading would be required to backfill the basement associated with the existing Beach Cities Health Center and to level the other areas of the Project site. Phase 2 would include the excavation of approximately 30,250 cy of soil, which would be necessary to facilitate the construction of the basement levels of the proposed parking structure. While construction activities would be temporary – lasting for a period of 29 months during Phase 1 and 28 months during Phase 2 – excavation and grading associated with the proposed Project would result in exposed soil and the potential for erosion caused by wind and/or stormwater runoff.

Because the Project site is greater than 1 acre in size, BCHD would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) in order to meet the requirements of the Statewide General Permit for Construction in accordance with the NPDES program (see Section 3.9, *Hydrology and Water Quality*). The SWPPP would contain BMPs designed to reduce the potential for erosion (e.g., sand/gravel bags, silt fences, dust control, etc.). Additionally, the proposed Project would be required to comply with all applicable SUSMP and LID requirements (RBMC Section 5-7.113) to address soil erosion and urban runoff. Under this ordinance, construction projects in Redondo Beach must prepare and submit a SUSMP, for compliance with the Municipal NPDES Permit to minimize potential water quality impacts, including soil erosion, from development. The SUSMP would include erosion drainage controls (e.g., detention ponds, sediment ponds or infiltration pits; dikes, filter berms or ditches; and/or down drains, chutes or flumes). Proof of compliance with the Municipal NPDES Permit would be required prior to the issuance of any demolition, grading, building, or occupancy permits, or any other type of permit or license issued by the City of Redondo Beach. With the implementation of BMPs in accordance with the SWPPP, and all applicable SUSMP and LID requirements, construction activities during Phase 1 and Phase 2 would not result in substantial erosion or loss of topsoil. As such, potential impacts associated with erosion or the loss of topsoil would be *less than significant*.

Following the completion of Phase 1 the overall open space on the BCHD campus would be increased to approximately 205,200 sf. Following the completion of Phase 2 the overall open space on the BCHD campus would range from 198,500 square feet (sf) to 221,400 sf depending on the ultimate site plan. As such, the overall open space would increase dramatically from the existing

82,940 sf currently on the campus – primarily along the eastern property boundary. As described further in Section 3.9, *Hydrology and Water Quality* stormwater would be captured and treated within the proposed storm drain network associated with the proposed Project, which would include the use of an infiltration system. Therefore, stormwater runoff associated with the proposed Project would not result in substantial erosion. Additionally, compliance with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the proposed Project, as required by MM GEO-1, would ensure that there would be no substantial erosion associated with engineered slopes and impacts would be *less than significant*.

Impact Description (GEO-3)

c) *The project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.*

d) *The project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.*

**GEO-3 The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not be located on an unstable geologic unit or soil that is made unstable as a result of the proposed Project or an expansive soil creating a substantial risk to life or property. Compliance with all applicable State and local regulations as well as the recommendations of the Geotechnical Report would ensure that potential impacts associated with the proposed Project would be *less than significant.***

As described in Impact GEO-2, construction of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program would involve excavation of substantial amounts of soil. Shoring would be required to provide adequate structural support for the excavations associated with the subterranean service area and loading dock in Phase 1 and the basement levels of the parking structure in Phase 2. Shoring may also be required to provide structural support for neighboring adjacent roadways, buildings, and other infrastructure. For example, the proposed excavation associated with the service area and loading dock in Phase 1 would be located immediately adjacent to Beryl Street and Flagler Lane. The shoring system recommended in the Geotechnical Report prepared by Converse Consultants (2016) is summarized in Section 2.5.1.6, *Construction Activities* and described in further detail within Appendix G. All excavation activities for the proposed Project – including the Phase 1

preliminary site development plan and the more general Phase 2 development program – would be required to adhere to mandatory regulations set forth by the California Occupational Safety and Hazard Administration (CalOSHA), which specify excavation requirements to protect life and safety of construction workers during excavation, as well as all requirements of Section 1541 (General Requirements) of Title 8 of the California Code of Regulations. All excavation activities would also be required to adhere to all applicable provisions of the CBC, including Section 3304 of Chapter 33 of the CBC (refer to Section 3.6.2, *Regulatory Setting*), which includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes. Excavation and shoring requirements are enforced through the City of Redondo Beach's and the City of Torrance's plan check process, which would require BCHD to prepare and submit grading plans, which depict excavation and shoring, to the City of Redondo Beach and City of Torrance Building & Safety Divisions prior to the issuance of permits for demolition or grading. Each of the cities would be responsible for reviewing the earthwork proposed within their respective jurisdictions. Conformance with all applicable State and local regulations as well as the implementation of MM GEO-2, which would require monitoring of adjacent roads, would ensure that impacts associated with soil stability would be *less than significant*.

The level topography of the Project site as well as the depth to groundwater and soil type result in limited potential for hydroconsolidation and differential settlement. According to the Geotechnical Report prepared by Converse Consultants (2016), the silty and clayey sands, which underlie the Project site do not exhibit hydroconsolidation or differential settlement characteristics (see Appendix G).

The soil borings collected as a part of the Geotechnical Report were tested and conservatively determined to be in the *"Very Low"* expansion range (Converse Consultants 2016). The UBC mandates that special foundation design consideration be employed if the Expansion Index is 20, or greater, as recorded in UBC Table 18-1-B. Compliance with all earthwork and site grading, design, and construction recommendations, including implementation of a monitoring program as recommended in the Geotechnical Report prepared by Converse Consultants (2016) and required by MM GEO-1 would ensure that any proposed import fill would have an Expansion Index of less than 20 would be reduced to *less than significant*.

Impact Description (GEO-4)

*f) The project would directly or indirectly destroy a unique paleontological or site or unique geologic feature.*

**GEO-4 The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would require excavations below fill soils placed during previous grading activities. However, the geologic unit that is likely to be affected by these excavations has a low potential to contain paleontological resources. Impacts would be *less than significant with mitigation.***

Implementation of the proposed Project would result in excavations to a depth of up to 26 feet. These excavations would occur in a 20,000-sf area at the corner of Flagler Lane and Beryl Street and an area of between 23,100 sf and 39,200 sf near the central area of the BCHD campus. The two geologic units likely to be encountered by these ground-disturbing activities include graded fill material extending as much as 13 feet below existing grade, and underlying Pleistocene-aged alluvium deposits, primarily composed of dune and drift sands. As previously described, the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources and the fill materials placed at the Project site from prior grading operations are too young to preserve paleontological resources. However, while individual fossil localities are rare, paleontological resources may still be present and should be protected or collected and deposited with an appropriate institution if uncovered during ground-disturbing activities. With adherence to MM GEO-2a and -2b, potential impacts to paleontological resources would be *less than significant with mitigation*.

Mitigation Measures

***MM GEO-2a Worker Paleontological Resource Awareness Session.*** *In order to educate construction contractors regarding the protection of any paleontological resources that are unexpectedly discovered during excavations associated with the proposed Project, the Beach Cities Health District (BCHD) shall retain a qualified paleontologist to develop a worker awareness program to educate all workers regarding the paleontological resources that, while unlikely, may occur on the development site as well as appropriate procedures to enact should paleontological resources be discovered during development. The qualified paleontologist shall develop appropriate training materials including, but not limited to, a summary of geologic units present at the Project site by depth, a description of potential paleontological resources that may be encountered during the proposed excavations, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to the initiation of excavation and grading activities or prior to*

*the start of work on-site for new workers hired after the initial awareness session. BCHD shall provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested.*

***MM GEO-2b*** ***Paleontological Resources Inadvertently Discovered During Ground-Disturbing Activities.*** *In the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities the following actions would be implemented by the construction contractor to prevent potential significant impacts on paleontological resources:*

- *Temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made.*
- *Immediately notify the City of Redondo Beach and/or the City of Torrance regarding the resource and redirected ground-disturbing activity.*
- *Obtain the services of a qualified professional paleontologist who shall assess the significance of the find and provide recommendations, as necessary, for its proper disposition.*
- *Complete all significance assessment and mitigation of impacts to the paleontological resource prior to resuming ground-disturbing activities in the area of the find.*

Residual Impacts

With the implementation of mitigation measures MM GEO-2a and -2b, impacts to paleontological resources would be reduced to *less than significant*.

Cumulative Impacts

A cumulative impact related to geology and soils would result if the impacts associated with the proposed Project, when combined with other past, present, and future project within Redondo Beach, Torrance, and the other neighboring South Bay communities would increase the potential for the number of residents and visitors to be exposed to geologic hazards. The geographic context for analysis of impacts on development from ground shaking or unstable soil conditions including landslides, liquefaction, subsidence, collapse, or expansive soil is generally site-specific. In accordance with State and local requirements, future projects in the Redondo Beach, Torrance,

Hermosa Beach, and Manhattan Beach would be required to conduct a geotechnical investigation prior to construction. This analysis would include sampling of native soils on-site and an assessment of the structural stability of each proposed structure, given the reasonably foreseeable seismic activity or unstable soil conditions. Each of the cumulative projects would be required to meet the most current and stringent building safety requirements. Therefore, it is anticipated that the cumulative risks of seismic ground shaking, seismic-related ground failure, soil instability, subsidence, collapse, and/or expansive soil would not be substantial. Compliance with the current CBC standards MM GEO-1 and MM GEO-2a and -2b would ensure that impacts to geology and soils associated with the proposed Project would be reduced to less than significant. As such, the proposed Project *would not substantially contribute to cumulatively considerable impacts*.

## 3.7 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

This section of the Environmental Impact Report (EIR) analyzes the potential impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) related to greenhouse gas (GHG) emissions and global climate change. This analysis estimates the GHG emissions that would result from the construction and operation of the proposed Project, including the generation of GHG emissions from vehicle trips; energy demands for building heating, cooling, and power; and construction of new buildings and associated infrastructure. The analysis focuses on the major GHGs generated by human activities including carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and chlorofluorocarbons (CFCs). (An analysis of other impacts related to air pollutant emissions is included in Section 3.2, *Air Quality*.) Information for this analysis was derived from the Intergovernmental Panel on Climate Change (IPCC), U.S. Environmental Protection Agency (USEPA), California Air Resources Board (CARB), South Coast Air Quality Management District (SCAQMD) and Southern California Association of Governments (SCAG) as well as the Redondo Beach and Torrance General Plans, Climate Action Plans, and municipal codes.

There are several unique challenges to analyzing GHG emissions and climate change under the California Environmental Quality Act (CEQA), largely due to the global nature of climate change. Typical CEQA analyses address local actions that have local or regional impacts, whereas GHG emissions and global climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. With regard to climate change, it is generally accepted that while the overall magnitude of global impacts is substantial, the contribution of any individual development project is so small that direct project-specific significant impacts – albeit not cumulatively significant impacts – are highly unlikely. Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region (i.e., air basin). Instead, a climate change analysis must be considered on a global level and requires consideration of GHG emissions from the project under consideration as well as the extent of the related displacement, translocation, and redistribution of GHG emissions.

### 3.7.1 Environmental Setting

<u>Overview of Global Climate Change</u>

The USEPA defines climate change as *"any significant change in the measures of climate lasting for an extended period of time."* In other words, climate change includes major changes in air temperature, precipitation, or wind patterns, among others, that occur over several decades or

longer. These changes are caused by a number of natural factors, including oceanic processes, variations in solar radiation reaching the Earth's atmosphere and surface, plate tectonics and volcanic eruptions, and anthropogenic (i.e., human-related) activities. The primary anthropogenic driver of climate change is the release of GHGs into the atmosphere (National Research Council 2010; IPCC 2014).

The Earth's natural warming process is known as the *"greenhouse effect."* The Earth's atmosphere consists of a variety of gases that regulate the Earth's temperature by trapping solar energy; these gases are cumulatively referred to as GHGs because they trap heat like the glass of a greenhouse. Relying on decades of research, the overwhelming majority of the scientific community agrees that human activities, including the burning of fossil fuels to produce energy and deforestation, have contributed to elevated concentrations of GHGs in the atmosphere since the Industrial Revolution (National Research Council 2010). The human production and release of GHGs to the atmosphere has caused an increase in the average global temperature. While the increase in global temperature is known as *"global warming,"* the resulting change in weather patterns is known as *"global climate change."*

Potential Effects of Global Climate Change

Potential adverse physical and environmental effects of global climate change include sea level rise, flooding, increased weather variability and intensified storm events, reduced reliability of water supplies, reduced quality of water supplies, and increased stress on ecosystems that would reduce biodiversity. Additionally, climate change has resulted in impacts to human health due to heat waves and extreme weather events, reduced air quality, and increased climate-sensitive diseases, including food-borne, water-borne, and animal-borne diseases.

Adverse effects from climate change are distributed across the world and have global consequences. Sensitive communities, such as low-lying nations that are more susceptible to impacts from sea level rise, may be more heavily impacted than communities in other regions.

Greenhouse Gases

Although GHGs include a variety of gases that have the potential to trap heat, policies and regulations to manage their effects generally focus on $CO_2$, $CH_4$, and $N_2O$. The following provides a brief description of each of these GHGs and their sources:

- **$CO_2$.** The natural production and absorption of $CO_2$ occurs through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, trees and wood products, and as a result of other chemical reactions, such as those required to manufacture cement. $CO_2$ is

constantly being exchanged among the atmosphere, ocean, and land surface as it is both produced and absorbed by many microorganisms, plants, and animals. However, emissions and removal of $CO_2$ by these natural processes tend to balance. Since the Industrial Revolution began around 1750, human-related activities had increased $CO_2$ concentrations in the atmosphere by more than 40 percent as of 2016 (USEPA 2016). Globally, the largest source of $CO_2$ emissions is the combustion of fossil fuels such as coal, oil, and gas in power plants, motor vehicles, and industrial facilities. $CO_2$ is sequestered (i.e., removed from the atmosphere) when it is absorbed by plants as part of the biological carbon cycle. When in balance, total $CO_2$ emissions and removals from the entire carbon cycle are roughly equal.

- **$CH_4$.** $CH_4$ is emitted from a variety of both human-related and natural sources. Anthropogenic sources include the production and transport of coal, natural gas, and oil, from livestock and other agricultural practices, and from the decay of organic waste in municipal solid waste landfills. It is estimated that 60 percent of global $CH_4$ emissions are related to human activities. Natural sources of $CH_4$ include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and wildfires (USEPA 2019).
- **$N_2O$.** Concentrations of $N_2O$ also began to rise at the beginning of the Industrial Revolution, reaching 314 parts per billion (ppb) by 1998. Microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen, produce $N_2O$. In addition to agricultural sources, some industrial processes (e.g., fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to the atmospheric load of $N_2O$ (USEPA 2019).

$CO_2$ is the most widely emitted GHG and is the reference gas for determining the global warming potential (GWP) of other GHGs. Because the impact each GHG has on climate change varies, the common metric of carbon dioxide equivalent ($CO_2e$) is used to report a combined impact from all of the GHGs. This metric scales the global warming potential of each GHG to that of $CO_2$. GHG emissions are typically expressed in metric tons of carbon dioxide equivalent (MT $CO_2e$) (USEPA 2017).

<u>Existing GHG Emissions from Human Activity</u>

The sources of GHG emissions from the operation of buildings generally consist of area, energy, mobile, waste, and water sources (California Air Pollution Control Officers Association [CAPCOA] 2013).

- **Area:** Area sources generally produce GHG emissions that occur in relatively small quantities over a dispersed area. For example, area sources include combustion of fossil fuels to operate landscape equipment, such as lawnmowers and trimmers.
- **Energy:** GHG emissions are also emitted as a result of activities within buildings when electricity and natural gas are used as energy sources (e.g., lighting and heating and air conditioning). Combustion of any type of fuel emits $CO_2$ and other GHGs directly into the atmosphere. When this occurs within building (e.g., the use of natural gas), it is considered a direct GHG emission source. However, GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.
- **Mobile:** Mobile source GHG emissions associated with a building are generally related to the on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the site based on the number of daily trips and vehicle miles traveled (VMT).
- **Waste:** The generation of municipal solid waste from day-to-day operational activities generally consists of product packaging, grass clippings, furniture, clothing, bottles, food scraps, newspapers, plastic, and other items routinely disposed of in trash bins. A portion of the solid waste is diverted to waste recycling and reclamation facilities. Waste that is not diverted is usually sent to local landfills for disposal, where the waste decomposes and results in GHG emissions of $CO_2$ and $CH_4$.
- **Water:** GHG emissions are also generated from the energy used to convey, treat, and distribute water and wastewater. As such, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water: 1) supply and conveyance of the water from the source; 2) treatment of the water to potable standards; and 3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

The burning of fossil fuels, such as coal and oil, especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in $CO_2$ emissions (and thus substantial increases in atmospheric concentrations). In 2019, atmospheric $CO_2$ concentrations were 412 parts per million (ppm), which represented an increase of nearly 50 percent above the pre-industrial concentrations that were present prior to 1750 (National Aeronautics and Space Administration [NASA] 2019).

*Global GHG Emissions*

The IPCC was formed by the World Meteorological Organization in 1988 to provide governments at all levels with scientific information that they can use to develop climate policies. The IPCC is the United Nation's body for assessing the science related to climate change and is responsible for tracking and reporting global emissions of GHGs. The IPCC is in the process of preparing the Sixth Assessment Report, tentatively scheduled for publication in June 2022. IPCC's Fifth Assessment Report, which was published in 2014 reported that global GHG emissions were estimated at 49 billion MT $CO_2e$ per year, with $CO_2$ making up 76 percent of the total anthropogenic GHG emissions. This is an overall increase in GHG emissions of 71 percent from the 28.7 billion MT $CO_2e$ of emissions in 1970 (IPCC 2014). Annual anthropogenic GHG emissions have increased by 10 billion MT $CO_2e$ between 2000 and 2010, with this increase directly coming from energy supply (47 percent), industry (30 percent), transport (11 percent), and buildings (30 percent) sectors (IPCC 2014).

*U.S. GHG Emissions*

The U.S. emitted 6.46 billion MT $CO_2e$ in 2017. Total U.S. emissions have increased by 1.3 percent from 1990 to 2017, but decreased by nearly 7 percent from 2010 to 2017. Fossil fuel combustion accounted for 93 percent of $CO_2$ emissions and approximately 75 percent of total U.S. GHG emissions in 2017. Of the six major sectors generating emissions through direct fossil fuel combustion – electricity generation, transportation, industrial, agricultural, residential, and commercial – electricity generation accounts for approximately 28 percent and transportation accounts for 29 percent of these emissions. Of the energy consumed in the U.S. in 2018, approximately 80 percent was produced through combustion of fossil fuels, while the remaining 20 percent came from other energy sources such as hydropower, biomass, nuclear, wind, and solar energy. In 2017, total GHG emissions by sector were 28 percent for the electric power industry, 29 percent for transportation, 22 percent for industry, 9 percent for agriculture, 6 percent for commercial, and 5 percent for residential (USEPA 2020).

*State of California GHG Emissions*

In 2017, California generated approximately 424.1 million MT $CO_2e$, approximately 7 percent of total U.S. emissions. This is due primarily to the population and size of California compared to other states. Despite a population increase of 6.2 percent between 2000 and 2018, the State's gross per capita emissions were reduced 24 percent from the 14.1 MT $CO_2e$ per person in 2001 to 10.7 MT $CO_2e$ per person (U.S. Census Bureau 2019; CARB 2018). This reduction indicates the contributions that energy conservation as well as energy efficiency have in reducing per capita

emissions. Reductions in 2008 and 2009 have also been attributed to the economic recession and higher fuel prices, with marked declines in on-road transportation, cement production and electricity consumption (CARB 2014).

*Redondo Beach GHG Emissions*

The City of Redondo Beach, working in conjunction with the South Bay Cities Council of Governments (SBCCOG), prepared GHG inventories for 2005 and 2012. These inventories, which represent the most recent publicly available data, estimate emissions for on-road transportation, off-road equipment, residential and commercial energy use, solid waste generation, and water and wastewater emissions. The inventories were prepared consistent with industry protocols including the U.S. Community Protocol for Accounting and Reporting of GHG Emissions, the Local Government Operations Protocol, and the California Association of Environmental Professionals whitepapers on inventorying, forecasting, and setting targets for GHG emissions. Transportation sector emissions are the result of gasoline and diesel combustion in vehicles traveling to, from, or within Redondo Beach, but exclude emissions associated with vehicles that pass through the City without stopping. Estimates for residential and commercial energy use are calculated based on the emissions generated by electricity and natural gas consumed by residences and commercial businesses within Redondo Beach, while solid waste emissions are based on the amount of waste disposed in landfills, where it decomposes and generates methane. Water and wastewater emissions are calculated by determining the energy needed to extract, transport, treat, and dispose of the water resources consumed by the community (SBCCOG 2017a).

Table 3.7-1 summarizes Redondo Beach's GHG inventory for the years 2005 and 2012. In 2005, Redondo Beach generated approximately 522,168 MT $CO_2e$. On-road transportation, at 246,707 MT $CO_2e$, represented the largest share of emissions at greater than 47 percent. In 2012, Redondo Beach generated approximately 523,400 MT $CO_2e$, with on-road transportation emissions contributing to approximately 51 percent of total City-wide emissions. However, with emissions decreasing in most sectors (i.e., commercial energy, solid waste, water, off-road sources, and wastewater), total emissions increased by just 0.2 percent from 2005 to 2012.

On a per capita basis, Redondo Beach generated 7.81 MT $CO_2e$ per year per resident in 2012, based on California Department of Finance estimates of 67,007 residents in 2012 (SBCCOG 2017a). These per capita estimates are substantially lower than the California average of 12.1 MT $CO_2e$ per resident in 2012 (CARB 2014).

**Table 3.7-1. City of Redondo Beach GHG Emissions Inventory**

| Emission Source | 2005 (MT $CO_2e$) | 2012 (MT $CO_2e$) | Percent Change from 2005 to 2012 |
|---|---|---|---|
| On-Road Transportation | 246,707 | 265,512 | 7.6% |
| Commercial Energy | 142,679 | 137,031 | -4.0% |
| Residential Energy | 95,616 | 101,010 | 5.6% |
| Solid Waste | 16,840 | 7,406 | -56.0% |
| Water | 15,576 | 10,332 | -33.7% |
| Off-Road Sources | 4,492 | 1,906 | -57.6% |
| Wastewater | 258 | 203 | -21.3% |
| **Total** | **522,168** | **523,400** | **0.2%** |

Source: SBCCOG 2017a.

*City of Torrance GHG Emissions*

The City of Torrance, working in conjunction with the SBCCOG, prepared GHG inventories for 2005, 2007, 2010, and 2012. As with the 2005 and 2012 inventories prepared by Redondo Beach, these inventories estimate emissions for on-road transportation, off-road equipment, residential and commercial energy use, solid waste generation, water, wastewater, and aviation emissions (SBCCOG 2017b). The inventories were prepared consistent with industry protocols including the U.S. Community Protocol for Accounting and Reporting of GHG Emissions, the Local Government Operations Protocol, and the California Association of Environmental Professionals whitepapers on inventorying, forecasting, and setting targets for GHG emissions (SBCCOG 2017b).

Table 3.7-2 below illustrates Torrance's GHG inventory for the years 2005 and 2012. In 2005, Torrance generated approximately 1,611,012 MT $CO_2e$. On-road transportation, at 670,670 MT $CO_2e$, represented the largest share of emissions at 41.6 percent. In 2012, the City generated approximately 675,221 MT $CO_2e$ from on-road transportation, a 0.7-percent decrease from 2005. By 2012, the City had a reduction in emissions of 3 percent from the 2005 inventory, with emissions decreasing in most sectors (e.g., residential energy, solid waste, water, off-road sources, and wastewater). The largest increase in emissions between 2005 and 2012 was the 4.2 percent increase in aviation emissions (SBCCOG 2017b).

**Table 3.7-2. City of Torrance GHG Emissions Inventory**

| Emission Source | 2005 (MT $CO_2e$) | 2012 (MT $CO_2e$) | Percent Change from 2005 to 2012 |
|---|---|---|---|
| On-Road Transportation | 670,670 | 675,221 | 0.7% |
| Commercial Energy | 617,177 | 620,690 | 0.6% |
| Residential Energy | 198,158 | 192,804 | -2.7% |
| Solid Waste | 66,013 | 39,906 | -39.5% |
| Water | 51,287 | 29,906 | -41.7% |
| Off-Road Sources | 3,875 | 1,018 | -73.7% |
| Wastewater | 562 | 443 | -21.2% |
| Aviation | 3,270 | 3,406 | 4.2% |
| **Total** | **1,611,012** | **1,563,394** | **-3.0%** |

Source: SBCCOG 2017b.

On a per capita basis, Torrance generated 10.7 MT $CO_2e$ per year per resident in 2012, based on California Department of Finance estimates of 146,115 residents in 2012 (SBCCOG 2017b). These per capita estimates are lower than the California average of 12.1 MT $CO_2e$ per resident in 2012 (CARB 2014).

*Project Site GHG Emissions*

The primary source of GHG emissions within the vicinity of the Project site are exhaust emissions from motor vehicles. GHG emissions also occur from various stationary sources, such as mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] systems) associated with buildings, the operation of various types of commercial restaurant and retail businesses, and industrial land uses. As described in Section 2.2.3, *Existing Project Site*, the Project site is currently occupied by Beach Cities Health Center, an attached maintenance building, two medical office buildings, two surface parking lots, and an above ground parking structure, each of which is a minor source of GHG emissions.

As described in Section 3.7.3, *Impact Assessment and Methodology,* existing operational GHG emissions at the Project site were modeled using California Emission Estimator Model (CalEEMod) Version 2016.3.2 based on the existing land uses currently on-site. The Project site currently contributes approximately 13,292 MT $CO_2e$ per year (see Table 3.7-3).

**Table 3.7-3. Existing Annual GHGs Emissions at the BCHD Campus**

| Category | Source | Annual GHG Emissions (MT $CO_2e$/year) |
|---|---|---|
| Area | Landscaping Equipment | 0.7 |
| Energy | Electricity and Natural Gas | 704.1 |
| Mobile | On-road Transportation | 12,459.0 |
| Waste | Solid Waste Generation and Disposal | 580.3 |
| Water | Water Usage and Wastewater Generation | 128.7 |
| | **Total** | **13,873** |

Note: Mobile emissions were calculated outside of CalEEMod, based on trip generation rates from the Transportation Study (see Appendix K). The CalEEMod evaluates only non-traffic operational emissions from the Beach Cities Health Center and Beach Cities Advanced Imaging Building. The Providence Little Company of Mary Medical Institute Building would remain in place under the proposed Project, and therefore is not included in this analysis. Totals may differ slightly from CalEEMod output sheets due to rounding.
Refer to Appendix B for detailed CalEEMod output sheets.

### 3.7.2 Regulatory Setting

Global climate change is addressed through the efforts of various Federal, State, regional, and local government agencies. These agencies work jointly and individually to understand and regulate the effects of GHG emissions and resulting climate change through legislation, regulations, planning, policymaking, education, and a variety of programs. The significant agencies, conventions, and programs focused on global climate change are discussed below.

Federal Regulations

*Federal Clean Air Act*

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that $CO_2$ is an air pollutant, as defined under the Clean Air Act Amendments, and that the USEPA has the authority to regulate emissions of GHGs. On May 13, 2010, the USEPA issued a Final Rule that took effect on January 2, 2011, setting a threshold of 75,000 MT $CO_2e$ per year for GHG emissions from major industrial facilities. The USEPA has not yet adopted thresholds for other GHG sources.

State Regulations

*Executive Order S-3-05 and Assembly Bill 32*

Executive Order S-3-05, established the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and

- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

The Secretary of California Environmental Protection Agency (CalEPA) has been charged with coordination of efforts to meet these targets and formed the Climate Action Team (CAT) to implement the Executive Order. The CAT also provided strategies and input to the CARB Scoping Plan.

In 2006, the California State Legislature adopted Assembly Bill (AB) 32, California Global Warming Solutions Act, to codify the targets in Executive Order S-3-05 of reducing GHG emissions in California to 1990 levels by 2020. The California Global Warming Solutions Act requires that CARB to adopt rules and regulations directing State actions that would achieve GHG emissions reductions equivalent to 1990 Statewide levels by 2020.

*Executive Order B-30-15 and Senate Bill 32*

Executive Order B-30-15 established a new State-wide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. This Executive Order acts as an intermediate goal to achieving 80 percent reductions by 2050 as outlined in Executive Order S-3-05. Additionally, this Executive Order aligns California's GHG reduction targets with those of leading international governments, including the 28 nations comprising the European Union. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal established by Executive Order S-3-05 of reducing emissions 80 percent under 1990 levels by 2050.

*Executive Order B-55-18*

Executive Order B-55-18 establishes a State-wide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This Executive Order demonstrates the State’s continued commitment to address climate change.

*CARB Scoping Plan*

CARB is responsible for the coordination and administration of both Federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets State ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs.

As directed by AB 32, CARB adopted the first Scoping Plan, which presented a set of actions designed to reduce overall GHG emissions in California (CARB 2008). This initial Scoping Plan provided an economy-wide approach to reducing emissions and highlighted the value of

combining carbon pricing with other complementary programs to meet California's 2020 GHG emissions target while ensuring progress in all sectors. Relative to transportation, the Scoping Plan included nine measures or recommended actions related to reducing VMT and transportation-related GHGs through fuel and efficiency measures. These measures would be implemented State-wide rather than on a project-by-project basis.

AB 32 requires CARB to update the scoping plan at least every 5 years. CARB released the First Update to the Climate Change Scoping Plan in May 2014 to provide information on the development of specific regulations and to adjust projections in consideration of the economic recession. The 2014 Update to the Scoping Plan presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for long-term progress beyond 2020. It also identified the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In response to Executive Order B-30-15 and Senate Bill (SB) 32, all State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the 2030 target. The 2017 Update to the Climate Change Scoping Plan was approved by CARB on December 14, 2017 (CARB 2017). The 2017 Scoping Plan builds upon the framework established by the initial 2018 Scoping Plan and 2014 Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that the State meets its GHG reduction targets.

Subsequent to the 2017 Scoping Plan, CARB adopted more aggressive SB 375 targets in 2018 as one measure to support progress toward the Scoping Plan goals, which encourage Sustainable Communities Strategies (SCSs) that plan to achieve, in aggregate, a 19 percent reduction in Statewide per capita GHG emissions reductions relative to 2005 by 2035 from passenger vehicles. However, CARB recognized that additional State and local actions are needed to achieve the transportation system reductions necessary to meet our climate goals, which is approximately 25 percent reduction in State-wide per capita GHG emissions by 2035 relative to 2005. In 2019, CARB released a 2017 Scoping Plan Update which includes a discussion of the relationship between local government actions and achievement of the State's long-term GHG emissions reduction goals, and non-binding recommendations to support local governments in their efforts to reduce GHG emissions. The 2017 Scoping Plan Update also identifies that slower growth in VMT from more efficient land use development patterns would promote achievement of the State's climate goals.

*Senate Bill 375, Sustainable Communities and Climate Protection Act*

The adoption of SB 375 created a process whereby local governments and other stakeholders must work together within their region to achieve the GHG reductions specified in AB 32 through integrated development patterns, improved transportation planning, and other transportation measures and policies. Under SB 375, CARB is required to set regional transportation-related GHG reduction targets for 2020 and 2035. Additionally, SB 375 required that those targets be incorporated within a SCS, a required element within the Metropolitan Planning Organization's (MPO's) Regional Transportation Plan (RTP).

On September 23, 2010, CARB adopted transportation-related GHG emissions reduction targets that require a 7 percent to 8 percent reduction by 2020 and between 13 percent and 16 percent reduction by 2035 compared to emissions in 2005 for each MPO. SCAG is the MPO for the Southern California region and is required to work with local jurisdictions, including the City of Redondo Beach and the City of Torrance. CARB has determined SCAG's reduction target for per capita transportation-related GHG emissions to be 13 percent by 2035.

*Senate Bill 97*

SB 97, adopted in 2007, amended CEQA to establish that GHG emissions and their effects are appropriate subjects for CEQA analysis, and directed the Governor's Office of Planning and Research (OPR) to develop CEQA Guidelines for evaluating and mitigating GHG emissions and global climate change effects. In March 2010, the California Office of Administrative Law adopted amendments to the CEQA Guidelines that provide regulatory guidance with respect to the analysis and mitigation of the potential effects of GHG emissions, as found in CEQA Guidelines Section 15183.5. The California Resources Agency adopted the Guidelines in January 2009.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in these amendments to the CEQA Guidelines. See Section 3.7.3, *Impact Assessment and Methodology* for further discussion of accepted methodology for evaluating the significance of GHG emissions.

*Senate Bill 350, Clean Energy and Pollution Reduction Act*

SB 350 establishes California's 2030 GHG reduction target of 40 percent below 1990 levels and sets out to help the State achieve this goal by setting ambitious 2030 targets for energy efficiency and renewable electricity (California Energy Commission [CEC] 2017).

*California Energy Efficiency Standards*

Title 24 of the California Code of Regulations (CCR) Part 6 comprises California's Energy Efficiency Standards for Residential and Nonresidential Buildings, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. Although the Energy Efficiency Standards were not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions. The 2019 standards are the most recent version, which went into effect on January 1, 2020.

*California Green Building Standard Code*

Title 24 of the CCR Part 11 comprises CALGreen, which was adopted in 2019 and went into effect January 1, 2020. CALGreen is the first State-wide mandatory green building code and significantly raises the minimum environmental standards for construction of new buildings in California. CALGreen establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of volatile organic compound (VOC) emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

Regional Regulations

*South Coast Air Quality Management District*

The SCAQMD is the agency principally responsible for comprehensive air pollution control in Los Angeles County. In order to provide GHG emissions guidance to local jurisdictions within the South Coast Air Basin, the SCAQMD has organized a Working Group to develop GHG emission analysis guidance and thresholds.

As of the present date, the only regulation adopted by the SCAQMD addressing the generation of GHG emissions is the establishment of a 10,000 MT $CO_2e$ per year screening level threshold of significance for stationary/source/industrial projects for which the SCAQMD is the lead agency.

SCAQMD released a draft guidance document regarding interim CEQA GHG significance thresholds in October 2008. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary sources (i.e., industrial

projects) where the SCAQMD is lead agency. SCAQMD proposed a tiered approach, whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. The tiered approach defines projects that are exempt under CEQA and projects that are within the jurisdiction of, and subject to the policies of, a GHG Reduction Plan as less than significant. This tiered approach is discussed in Section 3.7.3, *Impact Assessment and Methodology*.

*SCAG's Regional Transportation Plan / Sustainable Communities Strategy*

As required by SB 375, SCAG has adopted the RTP/SCS, which is the culmination of a multi-year effort involving stakeholders from across the SCAG region. The SCS is a newly required element of the RTP that provides a plan for meeting GHG emissions reduction targets set forth by CARB. SCAG's 2016-2040 RTP/SCS provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RTP/SCS includes a strong commitment to reducing emissions from transportation sources and emphasizes the crucial linkages and interrelationships between the economy, the regional transportation system, and land use. Strategies for achieving goals of available, safe, sustainable, and affordable transportation include: 1) investing in bus, light rail, and heavy rail transit, passenger and high-speed rail, pedestrian and bicycle transportation corridors, infrastructure, and transportation demand management (e.g., carpooling to reduce demand for individual transport); 2) encouraging public participation in the planning processes; and 3) educating the public about available transportation methods available in the region. As discussed above, CARB has determined SCAG's reduction target for per capita vehicular emissions to be 13 percent by 2035 relative to the 2005 baseline. In June 2016, CARB determined that SCAG's 2016-2040 RTP/SCS is consistent with their GHG reduction targets. Specifically, SCAG's plan is expected to help California meet and exceed its GHG reduction goals, with estimated reductions in per capita transportation emissions of 18 percent by 2035.

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt the 2020-2045 RTP/SCS (Connect SoCal) (SCAG 2020). The 2020-2045 RTP/SCS includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections. The intent of the plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal plan achieves per capita GHG emissions reductions relative to 2005 of 19 percent in 2035 (SCAG 2020).

*Beach Cities Livability Plan*

In 2011, the Hermosa Beach, Redondo Beach, and Manhattan Beach City Councils adopted the Beach Cities Livability Plan. The Plan analyzes the built environment and provides a framework to improve livability and well-being through land use and transportation systems. The Plan consists of goals and recommendations for safe walking and biking conditions and sustainable transportation choices. Implementation of this Plan not only improves support for walking and biking, but also reduces congestion and improves air quality.

*South Bay Bicycle Master Plan*

The South Bay Bicycle Master Plan is intended to guide the development and maintenance of a comprehensive bicycle network and develop a set of programs and policies throughout the South Bay Region. The participating cities are El Segundo, Gardena, Hermosa Beach, Lawndale, Manhattan Beach, Redondo Beach, and Torrance. The multi-city bicycle master plan encourages the replacement of vehicular trips with bicycle trips, which has a measurable impact on reduced fuel consumption and subsequently fewer mobile source pollutants.

City of Redondo Beach Local Polices and Regulations

As a local jurisdiction, the City of Redondo is responsible for the assessment and mitigation of GHG emissions resulting from its land use decisions. The City of Redondo Beach is also responsible for the implementation of transportation control measures as outlined in the Air Quality Management Plan (AQMP). Examples of such measures include development of bus turnouts to reduce traffic congestion, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City of Redondo Beach must consider the air quality impacts of new development projects for which the City is the lead agency, and require mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitoring and enforcing mitigation.

Many other proposed policies, as set forth in Section 3.2, *Air Quality* and Section 3.14, *Transportation*, also have the practical effect of reducing GHG emissions by reducing criteria air pollutant emissions, VMT, and fossil fuel, water, and energy consumption.

*Redondo Beach General Plan Transportation and Circulation Element*

Goal G2: Reduce Year 2030 trip generation by 25 percent compared to 2007 levels.

Goal G4: Residents and visitors should be able to safety and conveniently walk, bike, or take transit in Redondo Beach, as they prefer.

Goal G5: Expand Transportation Demand Management (TDM) programs that decrease the number of single-occupant vehicles on the road.

Goal G6: Redondo Beach favors development that purposefully integrates itself with surrounding transportation facilities.

Policy 1 Support transit-oriented development that reduces current automobile trips.

Policy 4 Encourage mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance.

Goal G12: Encourage all employers to pursue successful TDM measures demonstrated in South California.

Policy 16 Encourage flex hours in work environments.

Policy 17 Provide incentives for employer-based vanpools.

Policy 20 Investigate the use of shared transportation vehicles.

Policy 21 Work with adjacent cities to coordinate incentives for carpools, vanpools, and other measures for Redondo Beach residents.

Goal G13: Link existing and proposed bicycle facilities.

Goal G14: Increase the provision of bike lockers, bike racks, and lighting for bike facilities.

Goal G15: Ensure that residents will be able to walk or bicycle to destinations such as the beach, the Civic Center, Redondo Beach Pier, Riviera Village, and other activity centers.

Policy 28 Close existing gaps in sidewalk infrastructure where necessary, maintain existing sidewalks in good repair, and require sidewalks with all new development.

Policy P29 Provide climate-appropriate landscaping, adequate lighting, and street amenities to make walking safe, interesting, and enjoyable.

Policy P30 Promote use of alternative transportation for short trips and conduct periodic bicycle and pedestrian counts to assess whether alternative mode use is increasing.

Goal G16: Provide reliable, safe fixed-route transit.

Policy P37 Provide shuttle service to activity areas.

*General Plan Housing Element*

Goal 1.0: Maintain and enhance the existing viable housing stock and neighborhoods within Redondo Beach.

Policy 1.7 Promote the use of energy conservation techniques and features in the rehabilitation of existing housing.

Goal 2.0: Assist in the provision of housing that meets the needs of all economic segments of the community.

Policy 2.5 Promote the use of energy conservation features in the design of residential development to conserve natural resources and lower energy costs.

*Redondo Beach Climate Action Plan*

The City of Redondo Beach, in concert with the SSBCOG, prepared the Climate Action Plan, which was adopted in 2017. The Climate Action Plan includes a list of non-binding goals and strategies in the following five categories (SBCCOG 2017a):

- **Land Use and Transportation:** Facilitate pedestrian and neighborhood development and identify ways to reduce automobile emissions including supporting zero emission vehicle infrastructure, improving pedestrian and bicycle infrastructure, enhancing public transit service, and supporting reductions in single-occupancy vehicle use.
- **Energy Efficiency:** Emphasize energy efficiency retrofits for existing buildings, energy performance requirements for new construction, water efficient landscaping, financing programs that will allow home and business owners to obtain low-interest loans for implementing energy efficiency in their buildings.
- **Solid Waste:** Focus on increasing waste diversion and encouraging participation in recycling and composting throughout the community.
- **Urban Greening:** Create carbon sinks as they store GHG emissions that are otherwise emitted into the atmosphere as well as support health of the community.
- **Energy Generation:** Demonstrate the City's commitment to support the implementation of clean, renewable energy while decreasing dependence on traditional, GHG emitting power sources.

*Redondo Beach Municipal Code*

The Redondo Beach Municipal Code (RBMC) establishes green building standards, including water conservation measures.

Section 9-23.01 – Adoption of 2019 California Green Building Standards Code: The City adopted a Green Building Ordinance in 2008, with updates in 2019. This ordinance requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction, major remodels, and new or remolded landscapes.

City of Torrance Local Policies and Regulations

The Torrance General Plan includes various goals and policies designed to reduce GHG emissions within the City of Torrance (City of Torrance 2010). Climate change and GHG reduction policies are addressed in multiple chapters of the General Plan.

*General Plan Circulation and Infrastructure Element*

Objective CI.8: To maintain a comprehensive system of pedestrian pathways and bicycle routes that provide viable options to travel by automobile.

Policy CI.8.1 Provide and maintain safe, efficient, and convenient pedestrian pathways that offer access to major activity centers, recreation facilities, schools, community facilities, and transit stops.

Policy CI.8.5 Promote the provision of reasonable and secure bicycle storage and shower and locker facilities at major commercial developments and employment centers.

Policy CI.8.9 Promote the use of compact electric or similar powered vehicles for local trips.

*Torrance General Plan Community Resource Element*

Objective CR.13: To contribute to the improvement of local and regional ambient air quality to benefit the health of all.

Policy CR.13.2 Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality.

Policy CR.13.5 Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling.

Policy CR.13.7 Encourage the use of alternative fuel vehicles and re-refined oil.

Policy CR.13.8 Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality.

Objective CR.14: To reduce the City of Torrance's overall carbon footprint and counteract the effects of global warming through a reduction in the emissions of GHGs within Torrance.

Policy CR.14.1 Support the CARB in its ongoing plans to implement AB 32, and fully follow any new AB 32-related regulations.

Policy CR.14.2 Develop and implement GHG emissions reduction measures, including discrete, early-action GHG-reducing measures that are technologically feasible and cost-effective.

Policy CR.14.3 Pursue actions recommended in the U.S. Mayors Climate Protection Agreement to meet AB 32 requirements.

Policy CR.14.4 Act as a leader and example in sustainability and reduction in GHG emissions by conducting City business in the most GHG-sensitive way.

Objective CR.21: The efficient use and conservation of energy resources to reduce consumption of natural resources and fossil fuels.

Policy CR.21.1 Promote and encourage energy resource conservation by the public sector, private sector, and local school district.

Policy CR.21.3 Support the development and use of non-polluting, renewable energy resources.

Policy CR.21.6 Promote energy-efficient design features, including appropriate site orientation, use of light-colored roofing and building materials, and use of trees to reduce fuel consumption for heating and cooling.

Policy CR.21.7 Encourage owners to retrofit existing buildings with energy-conserving lighting fixtures. Also encourage owners to equip new buildings with energy-efficient lighting devices and to design projects to take full advantage of natural lighting.

*Torrance Climate Action Plan*

The City of Torrance, in coordination with SBCCOG, prepared the City of Torrance Climate Action Plan in order to reduce GHG emissions within Torrance (SBCCOG 2017b). The Torrance City Council adopted the City of Torrance Climate Action Plan on December 12, 2017. The City has established GHG reduction goals for year 2020 (15 percent below 2005 levels) and for year 2035 (49 percent below 2005 levels). The Climate Action Plan includes a list of non-binding goals and strategies in the following the same five general categories as the Redondo Beach Climate Action Plan described above (SBCCOG 2017b).

*Torrance Municipal Code*

Section 8.113 – California Green Building Code: Torrance Municipal Code (TMC) Chapter 8.113 adopts by reference the CALGreen requirements with the local amendments that require reuse or recycling of all trees, stumps, rocks and associated vegetation and soils removed from land clearing.

### 3.7.3 Impact Assessment and Methodology

Thresholds for Determining Significance

Due to the global effects of GHG emissions, impacts associated with GHG emissions are typically based on their cumulative effects. Appendix G of the 2020 CEQA Guidelines provides a set of screening questions that address impacts with regard to GHG emissions. Specifically, the CEQA Guidelines state that a proposed project may have a significant adverse impact related to GHG if:

a) The project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or

b) The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

According to the CAPCOA, *"GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective"* (CAPCOA 2008). Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that a single project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. CEQA Guidelines Section 15064.4(b) states that *"in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's*

*incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions."*

Generally, the evaluation of an impact under CEQA involves comparing the project's effects against a threshold of significance. The CEQA Guidelines clarify that "*when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.*" For GHG emissions and global climate change, there is not, at this time, one established quantitative threshold of significance for GHG impacts. Instead, lead agencies have the discretion to establish significance thresholds for their respective jurisdictions. A lead agency may look to thresholds developed by other public agencies or other expert entities, so long as the threshold chosen is supported by substantial evidence.

The CEQA Guidelines Section 15064.4(b) recommend considering certain factors when determining the significance of a project's GHG emissions, including: 1) the extent to which the project may increase or reduce GHG emissions as compared to the existing conditions; 2) whether the project's GHG emissions exceeds a significance threshold that the lead agency determines applies to the project; and 3) extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHGs.

Even in the absence of adopted, clearly defined thresholds for GHG emissions, CEQA requires that an agency makes a good faith effort to disclose the GHG emissions from a project and mitigate to the extent feasible whenever the lead agency determines that the project contributes to a cumulatively substantial climate change impact. Regardless of which threshold(s) are used, the agency must support its analysis and significance determination with substantial evidence (CEQA Guidelines Section 15064.7).

Although the GHG emissions associated with the proposed Project emissions have been quantified (see Table 3.7-4 through Table 3.7-6), neither CARB, SCAQMD, SCAG, the City of Redondo Beach, nor the City of Torrance have adopted a GHG significance threshold(s) applicable to the development of mixed-use infill projects Further, CEQA Guidelines Section 15183.5 allows lead agencies to choose to analyze GHG emissions of a project at a programmatic level, tiering from a plan for the reduction for GHG emissions or similar document, such as a Climate Action Plan. Plans used for tiering must include all of the plan elements identified in CEQA Guidelines Section 15183.5(b)(1). While the City of Redondo Beach and the City of Torrance completed their Climate Action Plans in 2017, neither of the Climate Action Plans qualify for tiering pursuant to CEQA Guidelines Section 15183.5 because the Climate Action Plans have not undergone CEQA review

per the tiering requirements from CEQA Guidelines Section 15183.5. Therefore, the analysis herein cannot rely on a qualitative tiering analysis with the local Climate Action Plans.

While no GHG significance threshold(s) have been adopted by the SCAQMD, the SCAQMD has been evaluating proposed GHG significance thresholds since April 2008. Most recently, in September 2010, the SCAQMD proposed a tiered efficiency target approach to evaluate potential GHG impacts from various uses. This tiered approach allowed for flexibility when analyzing GHG emissions based on project size, land use type, or other characteristics. The various tiers include: 1) potential CEQA exemptions for certain projects; 2) compliance with a qualified GHG reduction strategy; 3) comparison with separate screening level thresholds for industrial (10,000 MT $CO_2e$/year), commercial (1,400 MT $CO_2e$/year), residential (3,500 MT $CO_2e$/year), and mixed-use (3,000 MT $CO_2e$/year) projects or comparison against a single numerical screening threshold of 3,000 MT $CO_2e$/year for all non-industrial projects; 4) consistency with compliance options, including a performance-based reduction analysis (i.e., compare with a Business-As-Usual level), compliance with AB 32, and/or comparison with efficiency-based thresholds (i.e., quantitative thresholds that are based on a per capita efficiency metric; 4.8 MT $CO_2e$/service population/year for project level analysis and 6.6 MT $CO_2e$/service population/year for plan level analysis); and/or 5) implement off-site mitigation to reduce GHG emission impacts to a less than significant level. The Draft GHG guidance is included as part of the periodic updates to SCAQMD's Air Quality Handbook; however, the SCAQMD draft interim guidance was never officially adopted, and the proposed thresholds were not designed for versatile application to unique project types such as the proposed Project. These proposed targets have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the targets has not met since September 2010.

Additionally, the efficiency targets proposed under SCAQMD's proposed Tier 4 threshold are no longer applicable as they were specific to outdated AB 32 goals and do not consider the recently adopted 2030 GHG reduction targets contained in SB 32 and EO B-30-15. Instead, the 2017 Scoping Plan was recently approved by CARB on December 14, 2017, and sets the State on a course to reduce GHG emissions an additional 40 percent below 1990 levels by 2030 under SB 32 (CARB 2017). Under the 2017 Climate Scoping Plan, CARB recommends State-wide efficiency targets of no more than 6.0 MT $CO_2e$/service population/year by 2030 and no more than 2.0 MT $CO_2e$/service population/year by 2050; however, it is important to note that these efficiency targets are intended to apply to the sum of all sectors and are not appropriate for evaluating GHG emissions specific to the land use sector, such as the proposed Project.

To date, CARB, SCAQMD, SCAG, and the City of Redondo Beach and the City of Torrance have not adopted new efficiency targets established consistent with SB 32 for each sector for the 2030 and 2050 target years; however, various other organizations have published technical guidance evaluating potential 2030 efficiency metrics.

In addition to evaluation of a projects impacts against a quantifiable significant threshold, per to CEQA Guidelines Section 15064(h)(3), a project's contribution to a cumulatively considerable impact would not be substantial if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially reduce the cumulative impact within the geographic area of the proposed Project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include *"[a] water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."* Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with programs and/or other regulatory programs to reduce GHG emissions.

In light of this shifting regulatory environment and available threshold concepts recommended by expert agencies, the determination of whether the proposed Project would result in a cumulatively considerable contribution to the cumulative impacts of global climate change is based on the following:

- Whether the proposed Project would conflict with (and thereby be inconsistent with) the applicable regulatory plans and policies to reduce GHG emissions, which include the Redondo Beach General Plan and Climate Action Plan, the Torrance General Plan and Climate Action Plan; SCAG's 2020-2045 RTP/SCS (Connect SoCal); AB 32, SB 32, and SB 375; the OPR and Climate Action Team recommendations; and CARB's 2017 Scoping Plan Update.

<u>Methodology</u>

CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess the significance of GHG emissions quantitatively or qualitatively. Under either approach, the lead agency's analysis must demonstrate a good faith effort to disclose the amount and significance of GHG emissions resulting from a project, based to the extent possible on scientific and factual data (CEQA Guidelines Section 15064.4[a]). BCHD has chosen to provide both a

quantitative and qualitative GHG analysis for full disclosure of potential impacts related to GHG emissions and global climate change.

*Conflict with GHG Reduction Plans*

The analysis of potential conflicts with an adopted GHG reduction plan reviews whether the proposed Project would be consistent with applicable GHG plans at the State, regional, and local levels. At the State level, CARB's 2017 Scoping Plan Update provides strategies and recommendations for achieving the meet the State's 2020, 2030, and 2050 GHG reduction targets. Additionally, the 2017 Scoping Plan Update specifically addresses transportation-related GHG emissions, and provides technical information on what level of Statewide VMT reduction would promote achievement of Statewide GHG emissions reduction targets and the 2017 Scoping Plan Update. Further, the California CAT Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in AB 32 and Executive Order S-3-05.

Locally, the City of Redondo Beach's and City of Torrance's GHG reduction goals are contained within the respective General Plans and Climate Action Plans. The intent of a Climate Action Plan is to provide overarching policy direction with respect to climate change through City-wide objectives and broad strategies to reduce GHG emissions. The Climate Action Plan is not a regulatory plan to be applied directly to individual development projects. Rather, the cities recognize that GHG reduction goals cannot be achieved by individual projects alone, but instead requires a comprehensive approach that would include the enactment of future plans, changes to existing ordinances, and an integrated and sustainable approach to land use/transportation planning. For this EIR, the analysis is focused on whether the proposed Project would support, and not hinder, the City-wide objectives and goals of the Redondo Beach and Torrance Climate Action Plans. Thus, if the proposed Project is consistent with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching local and State regulations on GHG reduction.

*Net GHG Emissions Estimate*

Total GHG emissions (i.e., construction and operation) associated with the proposed Project were quantified to provide information to decision makers and the public regarding the level of the annual GHG emissions associated with the proposed Project. GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions:

- **Scope 1:** Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

- **Scope 2:** Indirect, off-site emissions associated with purchased electricity or purchased steam.
- **Scope 3:** Indirect emissions associated with other emissions sources, such as energy required to transport solid waste, water, and wastewater.

The proposed Project would result in net GHG operational emissions directly from on-road mobile vehicles, electricity, and natural gas, and indirectly from water conveyance, wastewater generation, and solid waste handling. In addition, construction activities such as demolition, hauling, and construction worker trips would generate GHG emissions. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

GHG emissions associated with the construction and operation of the proposed Project were estimated using the CalEEMod Version 2016.3.2. CalEEMod is a State-wide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects (CAPCOA 2017). CalEEMod was developed in collaboration with the air districts of California and is recommended by SCAQMD. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts and SCAG to account for local requirements and conditions. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. CalEEMod output sheets and detailed calculations are provided in Appendix B.

The quantification of GHGs from any project involves many uncertainties. For example, newer construction materials and practices, future energy efficiency requirements, future mobile source emission standards, and advances in technology would likely reduce future levels of air pollutant emissions, including GHGs. However, the net effect is difficult to quantify due to the difficulty in predicting future standards and requirements. Since CalEEMod does not take these future energy-reducing practices, requirements, standards, and technology into account, the estimated net increase in emissions resulting from implementation of the proposed Project are conservative. These same uncertainties and assumptions exist throughout the accepted analytical methodologies for quantifying GHG emissions.

*Construction GHG Emissions*

For the purposes of this EIR, construction work is assumed to begin Spring 2022 and would take place over two implementation phases, of approximately 29 months and 28 months, respectively (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Construction equipment generates GHGs such as $CO_2$, $CH_4$, and $N_2O$ through the combustion of fossil fuels. $CH_4$ may also be emitted during the fueling of heavy equipment.

The construction GHG emissions modeling considers the anticipated Project construction schedule and construction equipment mix. CalEEMod input values are adjusted to reflect these specific construction characteristics to estimate construction GHG emissions associated with the proposed Project. These values were applied to the same construction phasing assumptions used in the air quality criteria pollutant analysis (refer to Section 3.2, *Air Quality*) to generate annual GHG emissions for each construction year. Construction-related GHG emissions are then amortized over 30 years pursuant to current SCAQMD methodology. This means that the total construction emissions are divided by the lifetime of the project, which is generally assumed to be 30 years (SCAQMD 2008).

*Operational GHG Emissions*

Operation of the proposed Project would generate GHG emissions from on-site operations such as natural gas combustion for heating/cooking, landscaping equipment and the use of consumer products. GHG emissions would also be generated by vehicle trips associated with the proposed Project.

For operational emissions of GHG emissions, CalEEMod was used to estimate GHG emissions from natural gas, solid waste, water and wastewater, and landscaping equipment. Operational impacts were assessed for the full buildout under Phase 1 and Phase 2. CalEEMod was used to analyze operational GHG emissions from the operation of the proposed residential, medical office, community service, office, gym, restaurant, and open space land uses:

- **Vehicular Trips.** Vehicle trips generated as a result of the proposed Project would result in GHG emissions through combustion of fossil fuels. In calculating mobile-source GHG emissions, emissions are estimated based on the predicted number of trips to and from the Project site as determined in the Transportation Study (see Section 3.14, *Transportation* and Appendix K). Daily vehicle trips under existing baseline conditions and in 2024 and 2029 were multiplied by corresponding GHG emission factors produced by CARB's mobile source emissions model named EMissions FACtor (EMFAC2017; see

Appendix B). Trip lengths for areas within the SCAQMD are generated based on the SCAG's Transportation Demand Model (SCAQMD 2020).

- **On-site Use of Natural Gas and Other Fuels.** Natural gas would be used by the proposed Project for heating of the Assisted Living and Memory Care units and for the restaurant and dining uses, resulting in a direct release of GHGs. Estimated emissions from the combustion of natural gas and other fuels is based on the number of Assisted Living and Memory Care units and square footage of kitchen space. $CH_4$ and $N_2O$ emissions were estimated using the total VMT as determined by CalEEMod and USEPA emissions factors for on-road vehicles.
- **Electricity Use.** Use of electricity for the operation of the proposed Project would contribute to the indirect emissions associated with electricity production. Estimated emissions from the consumption of electricity are based on the number of dwelling units in the RCFE Building and square footage of residential, medical office, community service, office, gym, and restaurant space, using the standard electrical consumption rates from CalEEMod. This estimate is conservative in that the proposed Project would generate a percentage of its own energy using photovoltaic solar panels that would cover between 25 and 50 percent of the proposed roof space (refer to Section 2.5.15, *Sustainability Features*).
- **Water Use and Wastewater Generation.** The amount of water used and wastewater generated by a project has indirect GHG emissions as a result of the energy used to supply, distribute, and treat water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both $CH_4$ and $N_2O$ depending on the treatment method. Estimated emissions from the consumption of potable water were estimated as part of the CalEEMod modeling output. Estimated emissions from the generation of wastewater were based on the consumption factors using Wastewater Generation Factors from Exhibit M.2-22 of the Los Angeles CEQA Thresholds Guide (2006), consistent with the analysis of wastewater generation in Section 3.15, *Utilities and Service Systems*, multiplied by the number of dwelling units and the square footage of medical office, community service, office, gym, restaurant, and open space.
- **Solid Waste.** Emissions calculated for solid waste reflect the indirect GHG emissions associated with waste that is disposed at a landfill. GHG emissions from solid waste disposal are also calculated using CalEEMod. Emissions are based on solid waste calculated for the proposed Project and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for $CH_4$, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture

(e.g., no capture, flaring, energy recovery) are State-wide averages and are used in this assessment.

Other area sources of GHG emissions from operation of the proposed Project include equipment used to maintain landscaping, such as lawnmowers and trimmers. CalEEMod default emission rates were used in calculating GHG emissions from these additional area sources.

*Project Construction and Operational GHG Emissions*

Total annual GHG emissions for construction and operation of the proposed Project were estimated using CalEEMod (see Table 3.7-4 and Table 3.7-5; see Appendix B). It should be noted that the GHG emissions shown in Table 3.7-4 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment operates periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative, worst-case estimate. A complete listing of construction equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets provided in Appendix B of this EIR.

**Table 3.7-4. GHG Emissions from Construction of the Proposed Project**

| Year | GHG Emissions (MT $CO_2e$) |
|---|---|
| ***Phase 1*** | |
| 2022 | 715 |
| 2023 | 861 |
| 2024 | 286 |
| ***Phase 2*** | |
| 2029 | 404 |
| 2030 | 2,317 |
| 2031 | 1,670 |
| **Total** | **6,253** |
| **Amortized over 30 years** | **208.4 per year** |

Notes: See Appendix B.

As shown in Table 3.7-4 above, construction activities associated the proposed Project would result in temporary generation of GHG emissions totaling 6,253 MT $CO_2e$. As previously described, SCAQMD recommends that construction-related GHG emissions be amortized over a project's 30-year lifetime, beginning with the construction of Phase 1, to include these emissions as part of a project's annualized lifetime total emissions. Construction-related GHG emissions are divided by year and total construction GHG emissions are amortized over an anticipated 30-year

lifetime period to provide an average annual estimate of 208.4 MT $CO_2e$/year. In accordance with SCAQMD methodology, the amortized estimated construction GHG emissions are included in the annualized operational GHG emissions in Table 3.7-5 and Table 3.7-6 below.

**Table 3.7-5. Annual Operational GHG Emissions for Phase 1 of the Proposed Project**

| Annual Emissions by Category | GHG Emissions (MT $CO_2e$) |
|---|---|
| Area | 4 |
| Energy | 541 |
| Mobile | 4,884 |
| Waste | 220 |
| Water | 126 |
| **Phase 1 Operational Total** | **5,775** |
| Construction (amortized) | 208.4 |
| **Total Annual GHG Emissions** | **5,983.4** |

Notes: Mobile emissions were calculated outside of CalEEMod, based on trip generation rates from the Transportation Study (see Appendix K). Total annual GHG emissions are the sum of amortized construction and Phase 1 annual operational emissions. See Appendix B.

As described in Table 3.7-5 above, operational GHG emissions generated as a result of Phase 1 would be approximately 5,775 MT $CO_2e$/year. Pursuant to current SCAQMD methodology, the amortized construction GHG emissions are included in the total Phase 1 operational emissions. Therefore, total annual GHG emissions (i.e., amortized construction and operational) during Phase 1 of the proposed Project would be 5,983.4 MT $CO_2e$.

**Table 3.7-6. Combined Annual Operational GHG Emissions for the Proposed Project**

| Annual Emissions by Category | GHG Emissions (MT $CO_2e$) |
|---|---|
| Area | 4 |
| Energy | 1,682 |
| Mobile | 10,292 |
| Waste | 745 |
| Water | 201 |
| **Phase 1 and Phase 2 Operational Total** | **12,923** |
| Construction (amortized) | 208.4 |
| **Total Annual GHG Emissions** | **13,131.4** |

Notes: Mobile emissions were calculated outside of CalEEMod, based on trip generation rates from the Transportation Study (see Appendix K). Amortized construction and operational emissions are cumulative - they reflect total GHG emissions on-site following the buildout of Phase 2. Total annual GHG emissions are the sum of amortized construction and annual operational emissions. See Appendix B.

Cumulative operational GHG emissions following buildout of the proposed Project (both the Phase 1 preliminary site development plan and the more general Phase 2 development program) would be approximately 12,923 MT $CO_2e$/year (refer to Table 3.7-6). Pursuant to current SCAQMD methodology, the combination of amortized construction GHG emissions with operational GHG emissions would result in a combined total of approximately 13,131.4 MT $CO_2e$/year.

**Table 3.7-7. Net Annual Operational GHG Emissions for the Proposed Project**

| Annual Emissions | GHG Emissions (MT $CO_2e$) |
|---|---|
| **Proposed Project Annual GHG Emissions** (refer to Table 3.7-6) | 13,131.4 |
| **Existing Project Site Annual GHG Emissions** (refer to Table 3.7-3) | 13,873.0 |
| **Net GHG Emissions (Existing – Proposed)** | -741.6 |

Notes: Total annual GHG emissions are the sum of amortized construction and annual operational emissions. See Appendix B.

As described in Table 3.7-7 above, the net annual GHG emissions associated with the proposed Project were calculated by subtracting the existing annual GHG emissions associated with the Beach Cities Health Center and Beach Cities Advanced Imaging Building on-site (refer to Table 3.7-3) from the total GHG emissions associated with the proposed Project (refer to Table 3.7-6). When total annual GHG emissions from the proposed Project are compared to existing annual GHG emissions generated by the Project site, the net change in GHG emissions is a net reduction of approximately 741.6 MT $CO_2e$/year (refer to Table 3.7-7).

The net reduction in annual operational-related GHG emissions is primarily attributable to decreases in mobile source GHGs. As shown in Table 3.7-3, the majority of the annual GHG emissions generated by the BCHD campus result from mobile sources. Similarly, the majority of the GHG emissions associated with the proposed Project would also result from mobile sources (refer to Table 3.7-6). Although the proposed Project is anticipated to generate a net increase of approximately 376 daily vehicle trips (see Section 3.14, *Transportation*), mobile source emissions calculated for the buildout of the proposed Project would be reduced as compared to existing mobile source emissions at the Project site. This reduction in mobile source emissions is due to the fact that Federal and State combustion emissions standards become more stringent in future years. Emissions from mobile sources would decline in future years as older vehicles are replaced

with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards.[1]

As previously described, no quantitative significance thresholds for GHG emissions have been adopted by CARB, SCAQMD, SCAG, or the City of Redondo Beach and the City of Torrance. Tier 4 of SCAQMD's outdated tiered approach addresses residential, commercial, or mixed-use projects with net new GHG emissions that generate more than 3,000 MT $CO_2e$/year, and considers whether a project generates GHG emissions in excess of applicable performance standards for the service population (i.e., population plus employment). Given that the buildout of the proposed Project would result in a net reduction in total annual GHG emissions as compared to existing conditions, the net GHG emissions associated with the proposed Project would be well below the SCAQMD's proposed 3,000 MT $CO_2e$ per year target. As described above, the impact analysis below is based on consistency of the proposed Project with current State-wide and local policies, plans, and programs rather than outdated proposed thresholds.

It should also be noted that the operational emissions presented in Table 3.7-5 and Table 3.7-6 provide a conservative estimate of the actual GHG emissions, considering CalEEMod does not account for some of the sustainability and energy efficiency measures included as part of the proposed Project (e.g., photovoltaic solar panels, energy efficient HVAC systems, high-performance building envelope usage to maximize insulation, lighting systems designed with occupancy sensors and dimmers to minimize energy use, etc.).

### 3.7.4 Project Impacts and Mitigation Measures

<u>Impact Description (GHG-1)</u>

*a) The project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or*

[1] In 2012, the USEPA adopted Federal standards for model year 2017 through 2025 vehicles to promotes a new generation of cleaner, more fuel-efficient trucks by encouraging the development and deployment of new and advanced cost-effective technologies. These standards are slightly different from the California emissions standards (referred to as the Pavley Phase II standards), which require additional reductions in $CO_2$ emissions beyond model year 2016, but the State of California agreed not to contest these standards, due to the fact that while the national standard would achieve slightly less reductions in California, it would achieve greater reductions nationally, and is stringent enough to meet State GHG emission reduction goals. In 2012, CARB adopted regulations that allow manufacturers to comply with the 2017 through 2025 national standards to meet State law.

*b) The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.*

**GHG-1 The proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – would not generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Therefore, this impact would be *less than significant*.**

As shown in Table 3.7-6 and 3.7-7, the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. As such, the proposed Project would not generate GHG emissions that may have a significant impact on the environment.

As described in detail below, the proposed Project complies with Connect SoCal, the Redondo Beach and Torrance General Plans and Climate Action Plans, the RBMC, the TMC, AB 32, and SB 32, and thus would ensure that the GHG emissions associated with the proposed Project would conform with State and local requirements (see Tables 3.7-8 through 3.7-10).

*Project Consistency with City of Redondo Beach Policies and Regulations*

The proposed Project has been designed to be consistent with the City of Redondo Beach's local policies and regulations, and includes several design measures intended to reduce overall GHG emissions (see Table 3.7-8). The proposed Project requires approval of a Building Plan and Landscape and Irrigation Plan, as well as building, grading, shoring, plumbing, electrical, and mechanical permits from the City of Redondo Beach (refer to Section 1.5, *Required Approvals*), which will require that the proposed Project meets the City's guidelines for transportation and sustainable design. The proposed Project also includes sustainable design features and characteristics, such as a photovoltaic solar panels, solar hot water systems, and energy efficient HVAC systems, intended to reduce overall GHG impacts (refer to Section 2.5.1.5, *Sustainability Features*). As required by RBMC, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed Project would optimize passive design strategies, which use ambient energy sources (e.g., daylight and wind) to supplement electricity and natural gas to increase the energy efficiency.

Further, the proposed Project would minimize employee, visitor, and resident VMT to and from the Project site by implementing a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site. The TDM plan would include transit and carpool incentives for employees (see Section 3.14, *Transportation*). The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; electric vehicle (EV) charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. BCHD would provide incentives to employees and visitors for hybrid and/or electric car parking and provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. Additionally, the Assisted Living, Memory Care, and Program of All-Inclusive Care for the Elderly (PACE) services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (refer to Section 2.5.1.5, *Sustainability Features*).

The proposed Project would be consistent with the City of Redondo Beach's GHG reduction goals and policies established in the Redondo Beach General Plan Transportation and Circulation Element, General Plan Housing Element, and Climate Action Plan (see Table 3.7-8). Therefore, the proposed Project would be consistent with applicable Redondo Beach plans, policies, and regulations related to GHG emissions and impacts would be *less than significant*.

## Table 3.7-8. City of Redondo Beach General Plan and Climate Action Plan Policy Consistency Summary

| Policy | Relationship to Project |
|---|---|
| ***Redondo Beach General Plan Transportation and Circulation Element*** | |
| **G2.** Reduce Year 2030 trip generation by 25 percent compared to 2007 levels. | **Consistent.** As described in Section 2.5.1.5, *Sustainability Features* and Section 3.14, *Transportation*, the proposed Project would develop a TDM plan that would include trip reduction strategies to reduce single-occupancy vehicle trips to the Project site and measures to encourage employees and visitors to travel to the campus via multi-modal or active transportation (e.g., walking or biking). For example, the proposed Project would develop employment opportunities within 0.1 miles of several Beach Cities Transit Line 102 bus stops located at the Project site and within the immediate vicinity. The proposed Project would provide bicycle parking, employee shower and locker facilities, and a bicycle program sharing program for access to the adjacent bicycle paths and local surroundings. The proposed Project would promote walkability by providing several publicly accessible, tree-lined pedestrian pathways that would cross the Project site and would provide connections to adjacent residential neighborhoods, neighborhood-serving commercial uses, and recreational uses (e.g., Dominguez Park). Additionally, the proposed Project would encourage ride-share by providing designated parking for carpools and vanpools; and ride-share amenities, such as seating areas for ride-share waiting and a large roundabout for drop-off and pick-up for ride-share services (e.g., Uber, Lyft, etc.). The TDM plan would include carpool incentives for employees. The Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus. The TDM plan and project design features would help to decrease the number of single-occupant vehicle trips to and from the Project site (see Section 3.14, *Transportation*). |
| **G4.** Residents and visitors should be able to safety and conveniently walk, bike, or take transit in Redondo Beach, as they prefer. | |
| **G5.** Expand TDM programs that decrease the number of single-occupant vehicles on the road. | |
| **G6.** Redondo Beach favors development that purposefully integrates itself with surrounding transportation facilities. | **Consistent.** The proposed Project would develop additional employment opportunities within 0.1 miles of several Beach Cities Transit Line 102 bus stops located at the Project site and immediate vicinity. The proposed Project would promote walkability by providing several publicly accessible, tree-lined pedestrian pathways that would cross the Project site and would provide connections to adjacent residential neighborhoods, neighborhood-serving commercial uses, and recreational uses (e.g., Dominguez Park). Additionally, the proposed Project would include bicycle facilities, such as bicycle parking, employee shower and locker facilities, and a bicycle program sharing program for access to the adjacent bicycle paths and local surroundings. |
| **P1.** Support transit-oriented development that reduces current automobile trips. | |
| **P4.** Encourage mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance. | **Consistent.** The proposed Project would establish residential, medical office, community service, office, gym, restaurant, and open space uses adjacent to single- and multi-family residences. The proposed Project would also provide community-serving activities and events, such as local farmers' markets, and fitness classes, that would be available to adjacent residents. The Project site is also located immediately adjacent to existing recreational amenities (e.g., Dominguez Park) and commercial uses (i.e., Redondo Village shopping center). |
| **G12.** Encourage all employers to pursue successful TDM measures demonstrated in South California. | **Consistent.** The proposed Project would include designated parking for carpools and vanpools; and ride-share amenities, such as seating areas for ride-share waiting and a large roundabout for drop-off and pick-up for ride-share services (e.g., Uber, Lyft, etc.). The TDM plan would include carpool incentives for employees. The proposed |

## Table 3.7-8. City of Redondo Beach General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| **P17.** Provide incentives for employer-based vanpools. | Project would also provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |
| **P20.** Investigate the use of shared transportation vehicles. | |
| **P21.** Work with adjacent cities to coordinate incentives for carpools, vanpools, and other measures for Redondo Beach residents. | |
| **G13.** Link existing and proposed bicycle facilities. | **Consistent.** The Project site is located adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street east of Flagler Lane. Though not designated, Flagler Alley is also often used as an informal bicycle path. The proposed Project would include on-site bicycle facilities, such as bicycle parking and employee showers and lockers, to encourage active transportation to and from the Project site. |
| **G14.** Increase the provision of bike lockers, bike racks, and lighting for bike facilities. | |
| **G15.** Ensure that residents will be able to walk or bicycle to destinations such as the beach, the Civic Center, Redondo Beach Pier, Riviera Village, and other activity centers. | **Consistent.** The proposed Project would implement a program to encourage visitors to travel to the campus via multi-modal or active transportation (e.g., walking or biking). The proposed Project would include bicycle parking, employee shower and locker facilities, and a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. The proposed Project would also promote active transportation by providing publicly accessible, pedestrian linkages through the Project site as well as on-site bicycle facilities, which would assist in reducing vehicle trips and VMT. For example, the proposed Project would include 114,830 sf of ground-level open space traversed with tree-lined pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would encourage active transportation to and from the Project site. |
| **P28.** Close existing gaps in sidewalk infrastructure where necessary, maintain existing sidewalks in good repair, and require sidewalks with all new development. | **Consistent.** The proposed Project would include 114,830 sf of ground-level open space traversed with publicly accessible pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. |
| **P29.** Provide climate-appropriate landscaping, adequate lighting, and street amenities to make walking safe, interesting, and enjoyable. | **Consistent.** Plant species selection in the conceptual Landscape Plan – including drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees – were based on their drought resistance and ability to withstand local conditions such as temperature and shade. The Project site would include 114,830 sf of ground-level open |

## Table 3.7-8. City of Redondo Beach General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| | space traversed with publicly accessible, tree-lined pedestrian pathways. Open space areas would include an entry plaza featuring directional signage, public art, shaded seating areas, and security lighting. |
| **P30.** Promote use of alternative transportation for short trips and conduct periodic bicycle and pedestrian counts to assess whether alternative mode use is increasing. | **Consistent.** The Project site is located adjacent to several stops along the Beach Cities Transit Line 102. The proposed Project would include designated parking for carpools and vanpools; and ride-share amenities, such as seating areas for ride-share waiting and a drop-off and pick-up zone for ride-share services (e.g., Uber, Lyft, etc.). The TDM plan would include carpool incentives for employees. The proposed Project would also provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |
| **G16.** Provide reliable, safe fixed-route transit. | |
| **P37.** Provide shuttle service to activity areas. | |
| ***Redondo Beach General Plan Housing Element*** | |
| **P1.7.** Promote the use of energy conservation techniques and features in the rehabilitation of existing housing. | **Consistent.** The proposed Project would provide photovoltaic solar panels on campus to reduce the energy demand associated with the proposed Project. The design of the proposed Project would also optimize passive design strategies, which use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would also incorporate several sustainable design features to reduce the power demand associated with the proposed Project, including installation of energy efficient HVAC systems, operable windows to increase air flow, high-performance building envelope to maximize insulation, lighting systems with occupancy sensors and dimmers, and water-efficient equipment and plumbing infrastructure. |
| **P2.5.** Promote the use of energy conservation features in the design of residential development to conserve natural resources and lower energy costs. | |
| **Redondo Beach Climate Action Plan** | |
| **LUT A1.1.** Offer free parking to EVs. | **Consistent.** The proposed Project would include designated free parking for EVs with EV charging stations. |
| **LUT B1.1.** Facilitate bike-sharing. | **Consistent.** The proposed Project would include designated parking for carpools and vanpools; and ride-share amenities, such as seating areas for ride-share waiting and a large roundabout for drop-off and pick-up for ride-share services (e.g., Uber, Lyft, etc.). The TDM plan would include carpool incentives for employees. The proposed Project would also provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |
| **LUT B1.2.** Facilitate car-sharing. | |
| **LUT B1.3.** Facilitate ride-hailing and ride-sharing. | |
| **LUT C2.10.** Explore programs to offer discounted transit passes. | **Consistent.** The proposed Project would develop 157 new Assisted Living units, 60 replacement Memory Care units, and community service uses conveniently located adjacent to several stops along the Beach Cities Transit Line 102. The |

## Table 3.7-8. City of Redondo Beach General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| **LUT C2.11.** Fund transit services for the elderly and handicapped. | proposed Project would implement a TDM plan that would include transit and carpool incentives for employees. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |
| **LUT D2.3.** Require new developments to provide pedestrian, bicycle, and transit amenities. | **Consistent.** The proposed Project would implement a program to encourage visitors to travel to the campus via multi-modal and active transportation (e.g., walking or biking). The proposed Project would include 114,830 sf of ground-level open space traversed with publicly accessible, pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The proposed Project would also include bicycle parking, employee shower and locker facilities, and ride-share amenities for residents and visitors. The proposed Project would also implement a TDM plan with transit and carpool incentives for employees. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would encourage active transportation to and from the Project site. |
| **LUT D2.4.** Amend zoning ordinance to require shower facilities and dressing areas for new developments. | **Consistent.** The proposed Project would include employee shower and locker facilities and bicycle parking. |
| **LUT D2.5.** Require commercial and multi-family residential projects to provide permanent bicycle parking facilities. | |
| **LUT D2.13.** Construct or improve pedestrian infrastructure around transit. | **Consistent.** The Project site is located adjacent to several stops along the Beach Cities Transit Line 102. The proposed Project would promote multi-modal and active transportation (e.g., walking or biking) by providing pedestrian linkages through the site and bicycle facilities on-site. For example, the proposed Project would include 114,830 sf of ground-level open space traversed with publicly accessible, pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. Pedestrian-only open space on the ground level of the proposed Project would enhance active transportation usage in the Project vicinity. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would encourage active transportation in the vicinity of transit. |
| **LUT F2.4.** Encourage employers to provide vanpools or shuttles from major stations. | **Consistent.** The proposed Project would implement a TDM plan that would include transit and carpool incentives for employees. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |

## Table 3.7-8. City of Redondo Beach General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| **LUT G1.3.** Increase housing density near transit. | **Consistent.** The proposed Project would develop 157 new Assisted Living units, 60 replacement Memory Care units, and community services uses located adjacent to several stops along the Beach Cities Transit Line 102. The proposed Project would implement a TDM plan that would include transit and carpool incentives for employees. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |
| **LUT G2.4** Encourage mixed-use and infill development projects in key in-fill areas. | |
| **LUT G2.7.** Encourage new mixed-use development near transit. | |
| **EE E2.1.** Allow recycled or grey water for non-municipal uses. | **Consistent.** As described in Section 3.15, *Utilities and Service Systems*, the proposed Project may use recycled water from the West Basin Municipal Water District's (WBMWD's) Edward C. Little (ECL) Water Recycling Facility for operational landscaping irrigation. |
| **UG A1.1.** Establish/maintain a community garden – Investigate creating a new or maintain a current community garden. | **Consistent.** The proposed Project would upgrade BCHD's existing Demonstration Garden with demonstration vegetable garden plots, an orchard with citrus and other fruit trees, and a garden shed. The proposed Demonstration Garden would allow BCHD to continue its existing LiveWell Kids program, which delivers lessons in the gardens of all of the elementary schools within Redondo Beach as well as Hermosa View Elementary School. Students participate in hands-on gardening lessons about planting, composting, harvesting and mindful eating. The proposed Blue Zone Demonstration Kitchen would use produce grown in the proposed Demonstration Garden on campus. Further, the proposed Project would include a tree-lined promenade (also referred to as Main Street), which could support outdoor farmers' markets. |
| **UG A1.2.** Promote gardening and composting – Provide resources and information regarding community gardens and composting to educate the public on how to grow organic edible plants. | |
| **UG A2.1.** Establish a local farmers' market – Work with local organizations to establish farmers' markets in the community. | |
| **EGS A2.2.** Encourage and support on-site installation and use of renewable and alternative energy generation systems for residential, commercial, institutional, and industrial uses. | **Consistent.** The proposed Project would provide photovoltaic solar panels on campus to reduce the energy demand associated with the proposed Project. The design of the proposed Project would also optimize passive design strategies, which use ambient energy sources (e.g., daylight and wind) to supplement electricity and natural gas to increase the energy efficiency. |

*Project Consistency with City of Torrance Local Policies and Regulations*

The proposed Project would support the City of Torrance's GHG reduction goals and policies established in the Torrance General Plan Circulation and Infrastructure Element, General Plan Community Resource Element, and Climate Action Plan (see Table 3.7-9). Development of the proposed Project would be consistent the goals of General Plan and Climate Action Plan, which call for integration of land use and transportation to reduce GHGs by focusing new development near transit to create sustainable, active pedestrian-friendly development that decreases reliance on automobiles and increases walking, bicycling, and transit use. The proposed Project is a mixed-use infill development, which is located adjacent to existing neighborhood-serving commercial development, recreational uses (e.g., Entradero Park), multi-modal transit, and existing bicycle and pedestrian facilities. Directing growth to existing urbanized areas is an important strategy to reduce GHG emissions, largely due to reduced building energy and automobile use. These measures would ensure that the contribution of GHGs associated with the proposed Project would be reduced. The required sustainable features would also ensure that the proposed Project is consistent with local policies (see Table 3.7-9). Therefore, the proposed Project would be consistent with applicable City of Torrance plans, policies, and regulations, and impacts would be *less than significant*.

## Table 3.7-9. City of Torrance General Plan and Climate Action Plan Policy Consistency Summary

| Policy | Relationship to Project |
|---|---|
| ***Torrance General Plan Circulation and Infrastructure Element*** | |
| **Policy CI.8.1.** Provide and maintain safe, efficient, and convenient pedestrian pathways that offer access to major activity centers, recreation facilities, schools, community facilities, and transit stops. | **Consistent.** The proposed Project would promote walkability by providing several publicly accessible, tree-lined pedestrian linkages through the Project site and due to its location adjacent to multi- and single-family residences, neighborhood-serving commercial development, and recreational uses. For example, the proposed Project would include 114,830 sf of ground-level open space traversed with pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. Pedestrian-only open space on the ground level of the proposed Project would enhance active transportation vicinity of the Project site. |
| **Policy CI.8.5.** Promote the provision of reasonable and secure bicycle storage and shower and locker facilities at major commercial developments and employment centers. | **Consistent.** The proposed Project would include on-site bicycle facilities, such as secure bicycle parking and employee showers and lockers. |
| **Policy CI.8.9.** Promote the use of compact electric or similar powered vehicles for local trips. | **Consistent.** The proposed Project would include designated free parking for EVs with EV charging stations. |
| ***Torrance General Plan Community Resource Element*** | |
| **Policy CR.13.2.** Work with neighboring cities to implement local and regional projects that improve mobility on freeways and railways, reduce emissions, and improve air quality. | **Consistent.** The proposed Project would include bicycle parking, employee shower and locker facilities, and ride-share amenities for residents and visitors. The proposed Project would also implement a TDM plan with transit and carpool incentives for employees. The proposed Project would also implement a program to encourage visitors to travel to the campus via multi-modal and active transportation (e.g., walking or biking). BCHD would provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings (see Section 3.14, *Transportation*). The proposed Project would also promote multi-modal and active transportation by providing publicly accessible pedestrian linkages through the Project site and bicycle facilities on-site, which would assist in reducing vehicle trips and VMT. For example, the proposed Project would include 114,830 sf of ground-level open space traversed with pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. Pedestrian-only open space on the ground level of the proposed Project would enhance active transportation usage in the Project vicinity. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would encourage active transportation to and from the Project site. |
| **Policy CR.13.5.** Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling. | |

## Table 3.7-9. City of Torrance General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| **Policy CR.13.7.** Encourage the use of alternative fuel vehicles and re-refined oil. | **Consistent.** The proposed Project would include designated free parking for EVs with EV charging stations. |
| **Policy CR.13.8.** Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality. | **Consistent.** The proposed Project would implement several design features and programs to increase energy efficiency, reduce energy demand, and reduce GHG emissions from vehicle trips to the Project site. As required by TMC, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed Project would optimize passive design strategies, which use ambient energy sources (e.g., daylight and wind) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate photovoltaic solar panels; energy efficient HVAC systems; operable windows; high-performance building envelope usage to maximize insulation; lighting systems designed with occupancy sensors and dimmers to minimize energy use; and water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.). The proposed Project would also implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site (see Section 3.14, *Transportation*). |
| **Policy CR.14.1.** Support the CARB in its ongoing plans to implement AB 32, and fully follow any new AB 32-related regulations. | |
| **Policy CR.14.2.** Develop and implement GHG emissions reduction measures, including discrete, early-action GHG-reducing measures that are technologically feasible and cost-effective. | |
| **Policy CR.14.3.** Pursue actions recommended in the U.S. Mayors Climate Protection Agreement to meet AB 32 requirements. | |
| **Policy CR.14.4.** Act as a leader and example in sustainability and reduction in GHG emissions by conducting City business in the most GHG-sensitive way. | |
| **Policy CR.15.3.** Maximize the use of local water resources to reduce imported water supplies. | **Consistent.** As described in Section 3.15, *Utilities and Service Systems*, the proposed Project may use recycled water from the WBMWD's ECL Water Recycling Facility for operational landscaping irrigation. The proposed landscaping plan would also incorporate drought-resistant vegetation and water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.) to reduce the water demand associated with the proposed Project. |
| **Policy CR.15.4.** Encourage residents and businesses in Torrance to practice water conservation through incentive programs and where necessary, programs that penalize wasteful practices. | |
| **Policy CR.15.6.** Reduce the amount of water used for landscaping through such practices as the planting of native and drought-tolerant plants, use of efficient irrigation systems, and collection and recycling of runoff. | |
| **Policy CR.15.8.** Expand the use of recycled water at schools, parks, at City facilities, and other potential irrigation or industrial use sites. | |

## Table 3.7-9. City of Torrance General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| **Policy CR.15.9.** Identify opportunities for increased use of reclaimed water. | |
| **Policy CR.21.1.** Promote and encourage energy resource conservation by the public sector, private sector, and local school district. | **Consistent.** The proposed Project would provide photovoltaic solar panels on the campus to reduce the energy demand associated with the proposed Project. The proposed design would also optimize passive design strategies, which use ambient energy sources (e.g., daylight, wind) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would also incorporate several sustainable design features to reduce the power demand associated with the proposed Project, including installation of energy efficient HVAC systems, operable windows to increase air flow, high-performance building envelope to maximize insulation, lighting systems with occupancy sensors and dimmers, and water-efficient equipment and plumbing infrastructure (refer to Section 2.8, *Sustainability Features*). |
| **Policy CR.21.3.** Support the development and use of non-polluting, renewable energy resources. | |
| **Policy CR.21.6.** Promote energy-efficient design features, including appropriate site orientation, use of light-colored roofing and building materials, and use of trees to reduce fuel consumption for heating and cooling. | **Consistent.** The design of the proposed project would optimize passive design strategies, which use ambient energy sources (e.g., daylight, wind) to supplement electricity and natural gas to increase the energy efficiency. The western and eastern border of the campus would be lined with intermittent large shade canopy trees and smaller shade trees. The campus's northern border would be lined with shade and flowering ornamental trees. Larger trees would also be planted within and adjacent to the proposed parking lots, open space, building footprints to provide shade. |
| ***Torrance Climate Action Plan*** | |
| **LUT B1.1.** Facilitate Bike-sharing. | **Consistent.** The proposed Project would include designated parking for carpools and vanpools; and ride-share amenities, such as seating areas for ride-share waiting and a large roundabout for drop-off and pick-up for ride-share services (e.g., Uber, Lyft, etc.). The TDM plan would include carpool incentives for employees. The proposed Project would also provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |
| **LUT B1.2.** Facilitate Ride-hailing and Ride-sharing. | |
| **LUT C2.10.** Explore programs to offer discounted transit passes. | |
| **LUT C2.11.** Fund transit services for the elderly and handicap. | **Consistent.** The proposed Project would develop 157 new Assisted Living units, 60 replacement Memory Care units, and community service uses conveniently located adjacent to several stops along the Beach Cities Transit Line 102. The proposed Project would implement a TDM plan that would include transit and carpool incentives for employees. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |

## Table 3.7-9. City of Torrance General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| **LUT D2.3.** Require new developments to provide pedestrian, bicycle, and transit amenities. | **Consistent.** The proposed Project would include bicycle parking, employee shower and locker facilities, and ride-share amenities for residents and visitors. The proposed Project would also implement a TDM plan with transit and carpool incentives for employees. BCHD would provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings (see Section 3.14, *Transportation*). The proposed Project would also promote multi-modal and active transportation by providing pedestrian linkages through the site and bicycle facilities on-site, which would assist in reducing vehicle trips and VMT. For example, the proposed Project would include 114,830 sf of ground-level open space traversed with publicly accessible, pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. Pedestrian-only open space on the ground level of the proposed Project would enhance active transportation usage in the Project vicinity. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would encourage active transportation to and from the Project site. |
| **LUT D2.4.** Require commercial and multi-family residential projects to provide permanent bicycle parking facilities. | **Consistent.** The proposed Project would include bicycle parking, employee shower and locker facilities, and a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. |
| **LUT D2.5.** Provide short and long-term bicycle parking near key areas. | |
| **LUT D2.11.** Construct or improve pedestrian infrastructure around transit. | **Consistent.** The Project site is located adjacent to several stops along the Beach Cities Transit Line 102. The proposed Project would promote multi-modal and active transportation by providing pedestrian linkages through the site and bicycle facilities on-site. For example, the proposed Project would include 114,830 sf of ground-level open space traversed with publicly accessible pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. Given the location of the Project site adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would encourage active transportation in the vicinity of transit. |
| **LUT F1.4.** Encourage mixed-use and infill development projects in key in-fill areas. | **Consistent.** The proposed Project would develop 157 new Assisted Living units, 60 replacement Memory Care units, and community service uses located adjacent to several stops along the Beach |

## Table 3.7-9. City of Torrance General Plan and Climate Action Plan Policy Consistency Summary (Continued)

| Policy | Relationship to Project |
|---|---|
| **LUT F1.6.** Encourage new mixed-use development near transit. | Cities Transit Line 102. The proposed Project would implement a TDM plan that would include transit and carpool incentives for employees. Additionally, the Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus (see Section 3.14, *Transportation*). |
| **UG A1.1.** Establish/maintain a community garden – Create a new or maintain a current community garden. | **Consistent.** The proposed Project would upgrade BCHD's existing Demonstration Garden with demonstration vegetable garden plots, an orchard with citrus and other fruit trees, and a garden shed. The proposed Demonstration Garden would allow BCHD to continue its existing LiveWell Kids program, which delivers lessons in the gardens of all of the elementary schools within Redondo Beach as well as Hermosa View Elementary School. Students participate in hands-on gardening lessons about planting, composting, harvesting and mindful eating. The proposed Blue Zone Demonstration Kitchen would use produce grown in the proposed Demonstration Garden on campus. |
| **UG A1.2.** Promote gardening and composting – Provide resources and information regarding community gardens and composting to educate the general public on how to grow organic edible plants. | |

*Project Consistency with State-wide and Regional Mandates, Plans, Policies, and Regulations*

The primary focus of many of the State-wide and regional mandates, plans, policies, and regulations is to address global climate change. A single source of GHG emissions does not cause global climate change by itself; rather GHG emissions, in their aggregate, contribute to global climate change.

In addition to assessing consistency with local policies and regulations, the significance of the GHG emissions associated with the proposed Project has also been evaluated based on whether the proposed Project is consistent with the relevant State-wide and regional mandates, plans, policies and regulations to reduce GHG emissions including AB 32 and SB 32 (Health and Safety Code [H&SC] Division 25.5), SB 375, Connect SoCal, and other State-wide and regional regulations and programs. Because the proposed Project incorporates physical and operational sustainability features that would promote a reduction in GHG emissions (refer to Section 2.5.1.5, *Sustainability Features*), the proposed Project would not substantially contribute to a cumulatively considerable global climate change effect and would not conflict with the GHG reduction goals of H&SC Division 25.5 and associated GHG reduction plans such as Connect SoCal. Connect SoCal also strives towards enhancing the existing transportation system and integrating land use into transportation planning. Connect SoCal recommends local jurisdictions accommodate future growth within existing urbanized areas to reduce VMT, congestion, and GHG emissions. Consistent with Connect SoCal's alignment of transportation, land use, and housing strategies, the proposed Project would accommodate increases in population, households, employment, and travel demand by implementing smart land use strategies. As discussed previously, the Project site is an infill location within close proximity to existing restaurants, grocery, entertainment, recreational, and residential uses and in close proximity to existing Beach Cities Transit Line 102 bus stops along North Prospect Avenue and Beryl Street. The proposed Project would implement a TDM plan with transit and carpool incentives for employees. The proposed Project would also implement a program to encourage people to visit the campus via multi-modal and active transportation (e.g., walking or biking). The proposed Project would include designated free parking for EVs with EV charging stations. The Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at one time, which would reduce vehicle trips to the campus (refer to Section 2.5.1.5, *Sustainability Features*). The proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – would be consistent with all applicable goals of Connect SoCal intended to improve mobility and access to diverse destinations, promote smart growth, provide more transportation choices, and reduce vehicular demand and associated emissions. As such, the proposed Project would be consistent with regional plans to reduce VMT and associated GHG emissions, and impacts would be *less than significant*.

## Table 3.7-10. Project Consistency Summary with Regional GHG Emissions Reduction Strategies

| Strategy | Relationship to Project |
|---|---|
| ***Connect SoCal Land Use Actions and Strategies*** | |
| Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations | **Consistent.** The proposed Project would establish residential, medical office, community service, office, gym, restaurant, and open space uses located immediately adjacent to recreational amenities (e.g., Dominguez Park and Entradero Park) commercial uses and in close proximity to schools and multi-modal transportation options (i.e., Beach Cities Transit Line 102). |
| Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods | **Consistent.** The proposed Project would redevelop the existing campus to provide community services, activities, and events for the BCHD service population. |
| ***Connect SoCal Transportation Network Actions and Strategies*** | |
| Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets. | **Consistent.** The Project site is located in an urbanized area close to existing commercial and residential development. The proposed Project would develop additional housing and jobs within 0.1 miles of several Beach Cities Transit Line 102 bus stops located at the Project site and immediate vicinity (see Section 3.14, *Transportation*). The proposed Project would also develop a TDM plan that would include trip reduction strategies to reduce single-occupancy vehicle trips to the Project site and measures to encourage visitors to travel to the campus via multi-modal or active transportation (e.g., walking or biking). The proposed Project would ensure connectivity of the neighborhood to existing developed and recreational areas as well as provide bicycle parking to encourage bicycling and walking rather than driving. The proposed Project would promote walkability due to its location adjacent to residential neighborhoods, neighborhood-serving commercial uses, and recreational uses. Additionally, the proposed Project would include bicycle facilities, such as bicycle parking and employee shower and locker facilities, encouraging both patrons and employees to use alternative modes of transportation. |
| Plan for growth near transit investments and support implementation of first/last mile strategies. | |
| Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations). | |
| ***Connect SoCal Sustainability Actions and Strategies*** | |
| Integrate local food production into the regional landscape. | **Consistent.** The proposed Project would upgrade BCHD's existing Demonstration Garden with demonstration vegetable garden plots, an orchard with citrus and other fruit trees, and a garden shed. The proposed Demonstration Garden would allow BCHD to continue its existing LiveWell Kids program, which delivers lessons in the gardens of all of the elementary schools within Redondo Beach as well as Hermosa View Elementary School. Students participate in hands-on gardening lessons about planting, composting, harvesting and mindful eating. The proposed Blue Zone Demonstration Kitchen would use produce grown in the proposed Demonstration Garden on campus. |

## Table 3.7-10. Project Consistency Summary with Regional GHG Emissions Reduction Strategies (Continued)

| Strategy | Relationship to Project |
|---|---|
| ***Connect SoCal Technology Actions and Strategies*** | |
| Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space. | **Consistent.** The proposed Project would include sustainable transportation infrastructure, such as designated parking spaces for hybrid cars and EVs equipped with electrical charging stations, bicycle parking, and designated parking for carpools and vanpools. The TDM plan would include a bicycle sharing program for access to the adjacent bicycle paths and local surroundings. The proposed Project would also provide ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. |
| Identify ways to incorporate *"micro-power grids"* in communities, for example solar energy, hydrogen fuel cell power storage. | **Consistent.** The proposed Project would provide photovoltaic solar panels on campus to reduce the energy demand associated with the proposed Project. The design of the proposed Project would also optimize passive design strategies, which use ambient energy sources (e.g., daylight, wind) to supplement electricity and natural gas to increase the energy efficiency. |

Source: SCAG 2020.

The proposed Project would also be consistent with the State's strategies in the 2017 Scoping Plan to reduce GHG emissions (see Table 3.7-11). The 2017 Scoping Plan relies on a broad array of GHG reduction strategies, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms, such as the Cap-and-Trade Program. These potential strategies include increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems. The proposed Project would benefit from State-wide, regional, and local efforts towards increasing the portion of electricity provided from renewable resources. The proposed Project would also benefit from State-wide efforts towards increasing the fuel economy standards of vehicles. The proposed Project would utilize energy efficiency appliances and equipment, as well as encourage the use of public transportation through its TDM plan and the use of electric-powered vehicles by providing EV vehicle spaces. While CARB is in the process of developing a framework for the 2030 reduction target in the 2017 Scoping Plan, the proposed Project would support, or at a minimum not impede, implementation of these potential reduction strategies identified by CARB.

Further, CARB's 2017 Scoping Plan Update (released in January 2019) states *"in many instances, achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an inappropriate overall objective for new development"* and also recognizes that *"achieving a net zero increase in GHG emissions may not be appropriate or feasible for every project. Indeed, there are circumstances when certain types of development projects, by virtue of their location and land use context, are likely consistent with state climate goals, when considered on a per capita VMT basis."* The 2017 Scoping Plan Update further provides that VMT is a proxy for transportation-related GHG emissions and the associated effect on the climate. Based on the 2017 Scoping Plan Update, land use development projects in areas that would produce rate of light-duty VMT per capita that are approximately 16.8 percent lower than existing conditions (either lower than regional average or other appropriate context) could be, by virtue of their location and land use context, interpreted to be consistent with the transportation assumptions embedded in the 2017 Scoping Plan and with 2050 State climate goals. As discussed in detail in Section 3.14, *Transportation*, the home-based VMT per capita associated with the proposed Project would be 5 percent lower than existing regional averages and the home-based work VMT per employee calculated for the proposed Project would be 19 percent lower than existing regional averages. Therefore, when reviewing the proposed land use characteristics and associated VMT, the proposed Project would be in support of GHG reduction goals.

Based on the above, the proposed Project would be consistent with the California Renewables Portfolio Standard, SB 350, SB 100, Title 24 of the CCR, CALGreen, SB 375, and recommendations of the State Attorney General, OPR and Climate Action Team (see Table 3.7-11). Therefore, the proposed Project would be consistent with applicable plans, policies, and regulations and impacts would be *less than significant*.

## Table 3.7-11. Project Consistency Summary with State GHG Emissions Reduction Strategies

| Strategy | Relationship to Project |
|---|---|
| ***California Renewables Portfolio Standard and SB 350 and SB 100*** | |
| Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. SB 100 accelerates the Renewables Portfolio Standard Program goals as follows: 1) 50 percent renewable resources target by December 31, 2026; and 2) 60 percent renewable resources target by December 31, 2030. SB 100 also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. | **Consistent.** While this measure does not directly apply to the proposed Project, the proposed Project would be consistent with and would not conflict with this strategy because Southern California Edison (SCE) is required to meet the State's Renewable Portfolio Standard, including SB 100. SCE would also be required to meet the 60 percent renewable target in 2030. Additionally, the proposed Project would include the installation of solar photovoltaic panels. |
| ***Title 24 of the CCR*** | |
| Energy Efficiency Standards for Residential and Nonresidential Buildings | **Consistent.** The proposed Project would comply with the Title 24 Building Energy Efficiency Standards at the time of building permit issuance and would incorporate solar photovoltaic panels as well as energy-efficient HVAC and lighting systems, thereby reducing energy use, air pollutant emissions, and GHG emissions. |
| Title 24 includes water efficiency requirements for new residential and non-residential uses. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the RBMC, TMC, and CALGreen. The proposed Project would include water efficient equipment and plumbing infrastructure. As described in Section 3.15, *Utilities and Service Systems*, with regard to operational landscaping irrigation, the proposed Project may use recycled water from the WBMWD's ECL Water Recycling Facility. These options would be explored as final design plans are further developed. |
| ***California Green Building Standards Code Requirements*** | |
| All bathroom exhaust fans shall be ENERGY STAR compliant. | **Consistent.** The proposed Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in Title 24. |
| HVAC Systems will be designed to meet ASHRAE standards. | **Consistent.** The proposed Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in Title 24. |

**Table 3.7-11. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)**

| Strategy | Relationship to Project |
|---|---|
| Energy commissioning shall be performed for buildings larger than 10,000 sf. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with RBMC Section 9-23.01. |
| Air filtration systems are required to meet a minimum of MERV 8 or higher. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with the RBMC, TMC, and CALGreen. |
| Refrigerants used in newly installed HVAC systems shall not contain any CFCs. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with the RBMC, TMC, and CALGreen. |
| Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with RBMC, TMC, and CALGreen. |
| Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with the RBMC, TMC, and CALGreen by including bicycle parking at the main entrance, with the final number determined through the TDM plan. |
| Stormwater Pollution Prevention Plan (SWPPP) required. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the Redondo Beach Stormwater and Urban Runoff Pollution Control Regulations as well as CALGreen. |
| Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow. | **Consistent.** Refer to the consistency discussion under Title 24 of the CCR Title 24. |
| All irrigation controllers must be installed with weather sensing or soil moisture sensors. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with RBMC, TMC, and CALGreen. |
| Wastewater usage shall be reduced by 20 percent compared to current California Building Standards. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with RBMC, TMC, and CALGreen. |
| Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris. | **Consistent.** The proposed Project would exceed this requirement as part of its compliance with RBMC, TMC, and CALGreen. BCHD would submit a waste management plan to the City of Redondo Beach and diverting at least 50 percent of construction and demolition debris from landfills. As described in Section 3.15, *Utilities and Service Systems*, the proposed Project would also be served by Athens Services, which has already achieved a diversion rate of 75 percent through its contract with Athens Services that is in excess of the requirements of AB 939 and AB 341 to achieve a 50 percent diversion by 2020. |
| Requires documentation of types of waste recycled, diverted or reused. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with RBMC, TMC, and CALGreen. |

## Table 3.7-11. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)

| Strategy | Relationship to Project |
|---|---|
| Requires use of low VOC coatings consistent with AQMD Rule 1168. | **Consistent.** The proposed Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements. |
| 100 percent of vegetation, rocks, soils from land clearing associated with new non-residential developments shall be reused or recycled. Phased projects can stockpile onsite. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with the RBMC, TMC, and CALGreen. Usable fill material would be taken to certified construction and demolition waste processors where it would be recycled as feasible. |
| ***Mobile Source Strategy (Cleaner Technology and Fuels)*** | |
| Reduce GHGs and other pollutants from the transportation sector through transition to zero emission and low-emission vehicles, cleaner transit systems and reduction of VMT. | **Consistent.** While this measure does not apply to individual projects, the proposed Project would be consistent and would not conflict with this strategy by supporting the use of zero-emission and low-emission vehicles through the on-site provision of EV parking spaces. Further, the proposed Project would reduce VMT as a result of its urban infill location, with access to public transportation within a 0.25-mile radius of the Project site. |
| ***AB 1493 (Pavley Regulations)*** | |
| Reduces greenhouse gas emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model year 2017-2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020. | **Consistent.** The proposed Project would not conflict with implementation of the vehicle emissions standards. |
| ***Low Carbon Fuel Standard (Executive Order S-01-07)*** | |
| Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels. | **Consistent.** The proposed Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards. |
| ***SB 375*** | |
| SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's MPOs, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. | **Consistent.** While this measure does not directly apply to the proposed Project, the proposed Project would be consistent with and would not conflict with this strategy because the Project would be consistent with Connect SoCal goals and objectives under SB 375 to implement infill development and reduce regional VMT. The Project site is located within walking distance of public transportation. |
| ***SB X7-7*** | |
| The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by | **Consistent.** Refer to the consistency discussion under Title 24 of the CCR Title 24. |

## Table 3.7-11. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)

| Strategy | Relationship to Project |
|---|---|
| December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. | |
| ***California Integrated Waste Management Act of 1989 and AB 341*** | |
| The IWMA mandated that State agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020. | **Consistent.** While this measure does not apply to individual projects, the proposed Project would be served by a solid waste collection and recycling service, approved or licensed to collect solid waste in Redondo Beach, that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with and would not conflict with City-wide recycling targets. The proposed Project would incorporate sustainability waste diversion measures and performance standards to increase recycling and minimize waste disposal, consistent with the Redondo Beach and Torrance General Plans. These include implementing a construction waste management plan to divert 50 percent of all mixed construction and demolition debris a certified waste processor. During operation, the proposed Project would provide easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings). Provision of on-site recycling containers and waste reduction programs would support the measures to divert waste from landfills. |
| ***Climate Action Team*** | |
| Reduce diesel-fueled commercial motor vehicle idling. | **Consistent.** The proposed Project would comply with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. |
| Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction. | **Consistent.** Refer to the discussion under California Integrated Waste Management Act above. |
| Plant five million trees in urban areas by 2020 to effect climate change emission reductions. | **Consistent.** The proposed Project would provide appropriate landscaping on the Project site including drought-resistant vegetation and trees as required by City of Redondo Beach and City of Torrance regulations. |
| Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with RBMC, TMC, and CALGreen. Refer to the consistency discussion under Title 24 of the CCR Title 24. |
| Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have | **Consistent.** The proposed Project would utilize energy efficiency appliances and equipment and would meet or exceed the Title 24 Building Energy Efficiency Standards. |

## Table 3.7-11. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)

| Strategy | Relationship to Project |
|---|---|
| established specific goals for updating the standards; new standards are currently in development. | |
| Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems. | **Consistent.** The proposed Project would locate residential, medical office, community service, office, gym, restaurant, and open space uses in close proximity to multi- and single-family residential uses as well as recreational and commercial uses. The Project site is also within walking distance to several stops along the Beach Cities Transit Line 102. The area surrounding the Project site also provides an extensive network of sidewalks, pedestrian paths, and a bicycle route. |

Cumulative Impacts

As previously described, the analysis of GHG emissions is cumulative in nature because global climate change impacts are caused by cumulative GHG emissions. Additionally, physical impacts related to global climate change do not necessarily occur in the same area as the source of the GHG emissions. The preceding analysis, which describes the cumulative impacts of GHG emissions associated with the proposed Project, has found that the proposed Project would not conflict with (and thereby be inconsistent with) the applicable regulatory plans and policies to reduce GHG emissions. Therefore, the proposed Project *would not substantially contribute to a cumulatively considerable impact* related to GHG emissions and global climate change.

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## 3.8 HAZARDS AND HAZARDOUS MATERIALS

This section of the Environmental Impact Report (EIR) describes the existing conditions related to hazards and hazardous materials at the Beach Cities Health District (BCHD) campus and assesses the potential for impacts that could result from the implementation of the proposed BCHD Healthy Living Campus Master Plan (Project). A range of other types of hazards are addressed in other sections of this EIR, including: hazardous air pollutants (e.g., toxic air contaminants [TACs] and diesel particulate matter [DPM]) addressed in Section 3.2, *Air Quality*; geologic hazards (e.g., earthquakes) addressed in Section 3.6, *Geology and Soils*; urban fire protection services and response/suppression systems discussed in Section 3.13, *Public Services*; and transportation-related hazards (e.g., pedestrian and bicycle safety) discussed in Section 3.14, *Transportation*.

Hazardous materials are defined as substances with physical and chemical properties of flammability, corrosivity, reactivity, or toxicity, which may pose a threat to human health or the environment. The term *"hazardous materials"* is used in this section to refer to chemicals such as petroleum products, solvents, agricultural pesticides, herbicides, paints, metals, asbestos-containing material (ACM), lead-based paint (LBP), and other regulated materials (e.g., polychlorinated biphenyls [PCBs]). Additionally, the term *"release"* as used in this section includes known historical spills, leaks, illegal dumping, or other methods of release of hazardous materials to soil, sediment, groundwater, or surface water.

- **PHASE I ESA:** Phase I ESAs are due diligence reports prepared in advance of real estate transactions to identify existing or potential environmental contamination liabilities. The scope and requirements of a Phase I ESA are described in American Standard for Testing and Materials (ASTM) E-1527-13. Phase I ESAs generally rely on a site inspection, interviews, and database searches to identify the potential for Recognized Environmental Conditions (RECs) (i.e., potential sources of environmental contamination) associated with the underlying land as well as the physical improvements to the property.
- **PHASE II ESA:** If the Phase I ESA determines that there are RECs (i.e., potential sources of environmental contamination), then a Phase II ESA may be conducted. Phase II ESAs include targeted sampling, investigation, and analysis of the potential soil and/or groundwater contamination identified in the Phase I

The analysis of potential impacts associated with hazards and hazardous materials is based the findings of a Phase I Environmental Site Assessment (ESA) (2019) and a Phase II ESA (2020) prepared by Converse Consultants (see Appendix G). The Phase I ESA included an environmental regulatory database search as well as visual inspection of the Project site and the adjacent properties (e.g., Redondo Village Shopping Center, Dominguez Park, etc.). Based on the findings of the Phase I ESA, which identified potential sources of contamination including a previously abandoned and plugged oil and gas well located on the Flagler Lot as well

as a former dry cleaner located within the Redondo Village Shopping Center, a Phase II ESA was prepared. The Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor on the Project site. Based on the results of the soil testing, ambient indoor and outdoor air samples were also collected.

### 3.8.1 Environmental Setting

Historic Land Uses at the Project Site and within the Surrounding Vicinity

A review of available data – including aerial photographs, Sanborn Fire Insurance Maps, topographic maps, and local directories – indicates that the BCHD campus was historically developed as an agricultural use before its redevelopment as the South Bay Hospital beginning in 1958. Surrounding properties were similarly originally developed for agricultural uses and later converted in the 1960s to residential and commercial uses (see Table 3.8-1).

**Table 3.8-1. Summary of Aerial Photographs Depicting Previous Development on the Project Site and within the Surrounding Vicinity**

| Year | Previous Development |
|---|---|
| 1924 | The Project site is developed for agriculture uses with a small pond located on-site. The adjacent properties are similarly developed for agricultural uses. |
| 1947 | The Project site is vacant with the exception of a second pond located on the vacant Flagler Lot. The adjacent properties are primarily developed for agricultural uses. |
| 1951 | The Project site is partially graded; however, there are no substantial changes in development. The adjoining properties are primarily vacant; however, the adjoining property to the northeast appears to be developed as a landfill. |
| 1956 | The Project site is developed with a baseball field. There are no substantial differences in development at the surrounding properties. |
| 1963 | Former South Bay Hospital (currently Beach Cities Health Center; 514 North Prospect Avenue) is developed; however, adjacent Flagler Lot remains vacant. |
| 1972 | There are no substantial changes in development at the Project site. The adjoining properties are developed for residential uses and the property to the northwest is developed as a commercial shopping center with a gas station. The property to the northeast is developed with a park. |
| 1976 | The Beach Cities Advanced Imaging Building (510 North Prospect Avenue) has been developed on the Project site. |
| 1989 | The Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) and an aboveground parking structure are developed on the Project site. |

Notes: Available building permits, maintained by the Redondo Beach Building & Safety Division, were reviewed and are described in detail in Appendix G. These permits more specifically describe the timeline of development at 510, 512, 514, and 520 North Prospect Avenue
Source: Converse Consultants 2019, 2020.

Potential Presence of Hazardous Materials

As previously described, a Phase I ESA was prepared for the proposed Project by Converse Consultants in May 2019 to evaluate current environmental conditions at the Project site (Converse Consultants 2019; see Appendix G). Consistent with the requirements of ASTM E-1527-13, the Phase I ESA included an environmental regulatory database search (e.g., Department of Toxic Substances Control [DTSC] EnviroStor [Cortese List] and the State Water Resources Control Board [SWRCB] GeoTracker databases) as well as a visual inspection of the Project site and the adjacent properties.

*Potential Sources of Contamination within the Vicinity of the Project Site*

The Phase I ESA identified several potential environmental concerns adjacent to the Project site including:

- **Shell Gas Station at 1200 Beryl Street.** The existing Shell gas station is located adjacent to the northwest of the Project site within the Redondo Village Shopping Center. This site has been listed in various environmental regulatory databases for violations related to improper paperwork, improper monitoring, failure to maintain copies of relevant permits/plans on-site, failure to maintain an approved response plan, and other miscellaneous regulatory violations. However, each of these violations has been addressed and the site is currently in compliance (Converse Consultants 2019). This site is also listed in the Leaking Underground Storage Tank (LUST) database for an unauthorized release that was discovered in 2004. However, this release was remediated and a No Further Action was letter was issued by the Los Angeles Regional Water Quality Control Board (RWQCB) on April 12, 2012 (Converse Consultants 2019).

*The Redondo Village Shopping Center, located immediately north of the Project site along Beryl Street, includes a Shell gas station, which regularly handles and stores petroleum and diesel products. The Shell gas station was previously listed as a LUST Cleanup Site but has since been remediated with no further action required.*

- **Former Dry Cleaner at 1232 Beryl Street.** This site is listed in the Federal Drycleaners Database and appears to have operated from as early as 1990 to 2018 (Converse Consultants 2019). More recently, the location was operated as Coury & Son Cleaners; however, this business permanently closed in January 2018 (Converse Consultants 2019). As described in further detail below, the former dry cleaner that operated at the Redondo Village Shopping Center is suspected to be a source of tetrachloroethylene (PCE) soil contamination at the Project site and the neighboring properties (Converse Consultants 2020). Beginning in the mid-1930s, the dry cleaning industry began to use PCE as a primary solvent due to its cleaning power and compatibility with most clothing. Machines of this era were *"vented,"* meaning that their exhaust was expelled to the atmosphere, much like modern day tumble-dryer exhausts. Much stricter controls on solvent emissions have ensured that modern-day dry cleaning machines are now fully enclosed so no solvent fumes are vented to the atmosphere. PCE is a liquid that has the potential to enter into groundwater and/or volatize (i.e., to become a vapor) and permeate building foundations. The effects of PCE on human health depend greatly on the length and frequency of exposure. Short-term, high-level inhalation exposure (i.e., in confined spaces) can result in irritation of the upper respiratory tracts and eyes, kidney dysfunction, and neurological effects. Long-term exposure (e.g., in confined spaces) can result in neurological impacts including impaired cognitive and motor neurobehavioral performance as well as adverse effects in the kidney, liver, immune system and hematologic system, and on development and reproduction (U.S. Environmental Protection Agency [USEPA] 2016). In contrast exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). As described in further detail below a Phase II ESA – including soil sampling and indoor ambient air quality testing – was conducted at the Project site to determine the extent of PCE contamination as well as the potential for exposure to unsafe levels of PCE within confined spaces (i.e., buildings) on the campus.

- **Former Landfill at 200 Flagler Lane.** This landfill operated from 1904 to 1967, during which time it accepted *"inert, residential"* waste. The landfill was closed and underwent cleanup beginning in January 1989, after which it was issued a *"completed-case closed"* designation by the Los Angeles RWQCB on October 1, 2012 (Converse Consultants 2019). The property is currently developed as Dominguez Park, a 24-acre park with grass and trees, picnic areas and play equipment, a dog park, Heritage Court, and two Little League fields.

*Dominguez Park, which is located immediate adjacent to the northeast of the Project site, was formerly a landfill that was operated from 1904 to 1967.*

- **Redondo Village Shopping Center.** Multiple retail store/grocery store listings from within the shopping center were identified in the report as sources of small quantities of hazardous wastes (Converse Consultants 2019). However, no evidence suggesting any unauthorized releases was identified during the Phase I ESA, including the visual site inspection (Converse Consultants 2019).

*Potential Sources of Contamination at the Project Site*

The Phase I ESA identified several potential environmental concerns at the Project site including:

- **Underground Storage Tank.** One 10,000-gallon underground storage tank (UST) was identified on the existing campus. This UST, which is located beneath the northern surface parking lot, is plumbed to three back-up generators located within the Maintenance Building at 514 North Prospect Avenue. One

*One 10,000-gallon UST is located beneath the existing north surface parking lot on the campus and is associated with back-up generators located within the attached maintenance building.*

transformer was observed in the Maintenance Building and three pad-mounted transformers were observed outdoors adjacent to the building. However, the Phase I ESA determined that neither the UST nor the transformers would be considered hazardous (Converse Consultants 2019).

- **Former Oil and Gas Well.** The Phase I ESA also identified a former oil and gas well (Simmons Well #2) located on the vacant Flagler Lot (Converse Consultants 2019). The well was drilled in the 1930s and, according to production data, was in operation by Decalta International Corporation from July 1977 to October 1989. The well was no longer in production in November 1989 and has been listed by the California Geologic Energy Management Division (CalGEM; formerly the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources [DOGGR]) as *"abandoned and plugged"* (Converse Consultants 2019). CalGEM requires that all well casings shall be cut off at least 5 feet but no more than 10 feet below ground surface (bgs). According to available records, it appears that the top of the well casing was cut off at a depth of approximately 6 feet below grade at the time it was abandoned (Converse Consultants 2019, 2020). As described in further detail below a Phase II ESA – including soil sampling – was conducted at the vacant Flagler Lot to determine the potential for soil contamination associated with the former oil and gas well (Converse Consultants 2020).

*Hazardous Building Materials at the Project Site*

Based on aerial photographs, Sanborn Fire Insurance Maps, and other real estate documents, it was determined that construction of the existing buildings at the Project site occurred between 1958 and 1995. Based on the age of the buildings, the following hazardous building materials may be present on the campus:

- **Asbestos-Containing Material –** Asbestos is a naturally occurring carcinogenic fiber that was widely used in a variety of building materials as well as in friction and heat-resistant products. The use and manufacturing of ACM was banned in 1977 in California; however, older buildings constructed prior to 1978 may still contain ACM. Materials typically suspected of containing asbestos include drywall, floor tile and mastic, drywall joint compound, drop ceiling tile, stucco, window putty, and roofing materials. Asbestos release can occur after ACMs are disturbed by cutting, sanding or other remodeling activities. Improper attempts to remove ACM can release asbestos fibers into the air, increasing asbestos levels and affecting human respiratory health. The USEPA recommends removal of all ACM prior to renovation or demolition activities (USEPA 2017). Additionally, the

South Coast Air Quality Management District (SCAQMD) has specific regulations concerning demolition and renovation activities involving ACM. Under SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities (see Section 3.8.2, *Regulatory Setting*), if renovation or demolition would disturb any suspected ACM a licensed California Certified Asbestos Consultant must first survey the materials for asbestos. If asbestos is found, an asbestos abatement contractor must remove the ACM prior to the renovation or demolition. Physical sampling of ACM was not included in the scope of the Phase I ESA. However, due to the age of the existing buildings on-site it is assumed that ACM is present in one or more of the buildings (Converse Consultants 2019, 2020).

- **Lead-Based Paint –** Lead is a recognized harmful environmental pollutant exposed through air, drinking water, food, contaminated soil, deteriorating paint, and dust. Before the dangers of lead were documented, it was widely used in paint. In 1978, the State of California banned the use of LBP. However, older buildings constructed prior to 1978 may still contain LBP. If LBP is improperly removed from surfaces by dry scraping or sanding, LBP can be absorbed into the body and could pose a potential health risk. Physical sampling of LBP was not included in the scope of the Phase I ESA. However, due to the age of the existing buildings on-site it is assumed that LBP is present in one or more of the buildings (Converse Consultants 2019, 2020).
- **Polychlorinated biphenyls** – PCBs are a group of man-made compounds that were widely used in the past (e.g., in electrical equipment such as transformers and used as hydraulic fluid in older elevators), but which were banned at the end of the 1970s because of environmental concerns. During the visual site inspection associated with the Phase I ESA, one transformer was observed in the Maintenance Building and three pad-mounted transformers were observed outdoors adjacent to the building (Converse Consultants 2019). No leaking or staining was observed (Converse Consultants 2019).

*The former South Bay Hospital was developed by 1963 and the Beach Cities Advanced Imaging Building was developed by 1976, before regulations banned use of ACM, LBP, and PCBs in construction materials. Due to the age of the structures and their location in a coastal area the existing buildings may contain hazardous materials or mold.*

Because the buildings currently located on the Project site were constructed prior to the 1960s, the florescent light ballasts may also contain PCBs. However, there was no evidence of leaks from the ballasts and therefore, the potential for hazards associated with PCBs at the campus is low (Converse Consultants 2019, 2020).

The Phase I ESA prepared for the proposed Project identified the potential for PCE contamination on the campus, due to former dry cleaner located at 1232 Beryl Street as well as the potential for soil contamination as a result of the previously abandoned and plugged oil and gas well located on the vacant Flagler Lot. These issues were investigated further in a Phase II ESA prepared by Converse Consultants in February 2020. The Phase II ESA included the collection of soil borings to test soil and soil vapor on the Project site. Based on the results of soil testing ambient air samples were also collected.

- **SCREENING LEVELS:** Phase II Environmental Screening Levels are comparative concentrations of chemicals in soil or soil-gas, which represent a threshold for human health concern. In a Phase II ESA, these numbers are tools to compare directly with the contaminant detection on site. The Phase II prepared for the Project site used RWQCB Environmental Screening Levels (August 2019), DTSC Human Health Risk Assessment Note 3 Screening Levels (April 2019), and/or USEPA Regional Screening Levels (November 2019), as appropriate.
- **RESIDENTIAL SCREENING LEVEL:** There is a higher anticipation of exposure to toxic vapors at residential properties. This is because occupants are normally present 168 hours a week. As a result, residential screening levels tend to be more conservative (i.e., have a lower threshold limit). During a Phase II ESA, if the existing development includes residential land-use, it is most appropriate to compare results to residential screening levels, and secondarily to commercial screening levels.
- **COMMERCIAL SCREENING LEVEL:** There is a lower anticipation of exposure to subsurface vapors at commercial properties. This is because occupants are normally present approximately 40 hours a week. Thus, commercial environmental screening levels generally have a higher threshold limit.

*Soil Samples*

During preparation of the Phase II ESA, a total of 15 soil borings were collected throughout the Project site, including 10 borings on the existing campus and 5 soil borings within the vacant Flagler Lot (see Figure 3.8-1). Of the 10 soil borings located on the existing campus, 9 were completed to a depth of 15 feet bgs. The other soil boring, which was located within the northern surface parking lot along the border with the Redondo Village Shopping Center, was completed to a depth of 30 feet bgs. This soil boring (i.e., B-1; see Figure 3.8-1) was completed to a greater depth in order to investigate the potential for the migration of potential PCE contamination from the former dry cleaner at 1232 Beryl Street. The 5 soil borings within the vacant Flagler Lot were completed to a depth of 15 feet bgs.

wood.

**Soil Boring Sample Locations**

**FIGURE 3.8-1**

- **Metals.** Ten metals were reported in the soil samples: barium, cadmium, chromium, cobalt, copper, lead, mercury, nickel, vanadium, and zinc. Each of these the metals were reported at concentrations less than their respective DTSC and USEPA residential screening levels (Converse Consultants 2020).
- **Total Petroleum Hydrocarbons.** Total Petroleum Hydrocarbons (TPH) in the heavy oil range was detected in two samples at boring locations within the vacant Flagler Lot (i.e., B-14 and B-15; refer to Figure 3.8-1) at concentrations of 20.9 and 123 milligrams per kilogram (mg/kg), respectively, which are well below the DTSC and USEPA residential screening level of 180,000 mg/kg. These concentrations are most likely related to the previously abandoned and plugged oil and gas well located at this site (Converse Consultants 2020). TPH in the gasoline and diesel ranges was not detected in any of the samples (Converse Consultants 2020).
- **Organochlorine Pesticides.** Concentrations of 4,4'-dichlorodiphenyldichloroethylene (DDE) and dichlorodiphenyltrichloroethane (DDT) were detected at concentrations of 254 and 30 micrograms per kilogram (µg/kg), respectively, near the entrance to the Beach Cities Health Center (i.e., B-10). These concentrations, which likely result from the historic agricultural use of the Project site, are well below their DTSC and USEPA residential screening levels of 2,000 mg/kg, and 1,900 µg/kg, respectively. No other organochlorine pesticides were identified in any of the samples analyzed.

*Soil Vapor Samples*

Soil vapor samples were also collected from the boreholes associated with each of the soil borings. The following 16 volatile organic compounds (VOCs) were detected in one or more of the soil vapor samples: benzene; PCE; chloroform; toluene; dichlorodifluoromethane; trichloroethylene (TCE); 1,1-dichloroethene; trichlorotrifluoromethane; ethylbenzene; 1,2,4-trimethylbenzene; 4-isopropyltoluene 1,3,5-trimethylbenzene; n-propylbenzene; m,p-xylene; styrene; and o-xylene. Of the 16 VOCs detected, 13 were detected at levels below their residential screening levels. Only three were reported at concentrations in excess of their respective residential screening levels: PCE, benzene, and chloroform.

- **PCE.** PCE was detected in 24 of the 30 samples at concentrations in excess of the RWQCB Environmental Screening Levels (August 2019) residential screening level. The former dry cleaner that operated at the Redondo Village Shopping Center is suspected to be the source of the PCE, because concentrations generally decrease to the south across the Project site with distance from the historical dry cleaner location. As previously described, PCE is a

liquid that has the potential to enter into groundwater and/or volatize and permeate building foundations. This is considered a potential risk to human health.

BCHD notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division, which is the Certified Unified Program Agency (CUPA) for Redondo Beach, [1] as well as the Los Angeles Regional Water Quality Control Board (RWQCB). BCHD also notified the owners at 1232 Beryl Street, where the historical dry cleaner was located (BCHD 2020). BCHD is working with these entities (e.g., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the CUPA for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup. The most common remediation method for PCE is vapor extraction, which involves drilling wells and installing carbon filtration systems. The PCE gets stuck on the carbon filter and clean air is discharged.

- **Benzene.** Benzene was detected in two of the 30 samples, in excess of the RWQCB Environmental Screening Levels (August 2019) residential screening levels, at a depth of up to 15 feet. Because these detections were taken from samples in the north-central portion of the Project site, the Shell gas station located at the adjoining property to the northwest does not appear to be the source. Leaks from vehicles in the surface parking lots on the existing campus are a potential source of benzene (Converse Consultants 2020).
- **Chloroform.** Chloroform was detected in four of the 30 samples, one of which exceeded the RWQCB Environmental Screening Levels (August 2019) residential screening levels and three of which exceeded the less conservative commercial screening levels. These four samples were taken in the southern portion of the Project site. Sources of the detected chloroform are unknown but potentially include leaky water pipes because chloroform is a byproduct of the chlorination process used in most municipally supplied drinking water.

Methane was not detected in any of the probes at concentrations greater than the background concentration of 0.1 parts per million by volume (ppmv); therefore, neither the existing campus,

[1] As described in Section 3.8.2, *Regulatory Setting* SB 1082 created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which requires the administrative consolidation of six hazardous waste and hazardous materials programs under the California Unified Program Administrator (CUPA). These programs include: Hazardous Materials Disclosure Program (Article 1 Chapter 6.95 Health & Safety Code [H&SC]); California Accidental Release Program (Article 2 Chapter 6.95 H&SC); Underground Storage Tank Program, (Chapter 6.7 H&SC); California Fire Code dealing with Hazardous Materials Management Plans; Hazardous Waste (Chapter 6.5 H&SC); and Tiered Permitting (Chapter 6.5 H&SC).

nor the vacant Flagler Lot appear to be impacted as a result of being located in the Torrance Oil Field or adjacent to the former landfill at Dominguez Park (Converse Consultants 2020). Additionally, the Phase II ESA soil and soil vapor sampling found no evidence of impacts from the 10,000-gallon diesel fuel UST currently operating on-site or from the Shell gas station (Converse Consultants 2020).

*Indoor Air Quality Samples*

Based on the VOC concentrations in the soil vapor samples – particularly the PCE concentrations, which exceeded the RWQCB Environmental Screening Levels (August 2019) residential screening levels – five ambient air quality samples were collected to evaluate the potential vapor intrusion. Indoor air quality samples were collected at Beach Cities Health Center (514 North Prospect Avenue) and the attached Maintenance Building as well as Beach Cities Advanced Imagine Building (510 North Prospect Avenue) and Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue). Additionally, an outdoor ambient air quality sample was collected in close proximity to the Maintenance Building (Converse Consultants 2020).

- **PCE** was reported at a maximum concentration less than the residential screening level for indoor air. All reported concentrations of PCE in indoor air quality samples were generally consistent with the concentration reported in the outdoor ambient air quality sample. Therefore, the concentration of PCE detected in indoor air quality samples were determined to be related to background levels present in the ambient air rather than from concentrations in the subsurface that may have intruded through the building foundation (Converses Consultants 2020).
- **Benzene and Chloroform** were detected in excess of their residential screening levels for indoor air in all samples. However, all but one sample in the parking garage storage room were generally similar to the background concentrations reported in the outdoor air quality sample. The elevated concentrations of benzene and chloroform in the sample from the parking garage storage room are likely related to exhaust from vehicles or disinfection/cleaning products. The concentrations detected in all other indoor air quality samples are likely to be related to background levels present in the ambient air rather than from concentrations in the subsurface that may have intruded through the building foundation.

*Excavation of Former Oil and Gas Well*

*This historic aerial image taken in 1960 depicts the hospital building (lower right corner) as well as the oil and gas well located on the vacant Flagler Lot.*

In August 2020, following the completion of the Phase II ESA soil and soil vapor sampling, Converse Consultants attempted to identify the location of the abandoned oil and gas well. Converse Consultants used aerial photographs to determine the approximate location of the well, but were unable to confirm the precise location in the field with an excavator. Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site in September 2020 using a magnotemeter for the purpose of locating the former oil and gas well on the property. A significant magnetic anomaly suspected to be the oil and gas well was identified approximately 30-feet east of the western fence boundary and approximately 30 feet north of the toe of the slope at the vacant Flagler Lot. Terra-Petra excavaed the well to physically locate it and completed a leak test, which was negative (i.e., no leaks were detected). Terra-Petra ~~is preparing~~prepared a summary report ~~to be~~that was shared with CalGEM, the responsible oversight agency. The report ~~shall summarize~~summarized all of the activities completed to date including a copy of the geophysical survey, results of the leak test, and a map illustrating the location of the well based on the survey.

Terra-Petra will also initiate the Construction Site Plan Review process to be completed with CalGEM, which will conclude with the issuance of a Well Review letter describing CalGEM's recommendations. The Construction Site Plan Review shall include the following:

- A completed and signed Construction Site Plan Review application form;
- A completed supplemental real property form;
- An Assessors/Tract Map showing street names, lot dimensions and lot numbers for the property;
- Geophysical Survey Site plan showing well names and well locations with distance from proposed property structures and property lines. The plan will overlay any known oil well locations and/or metallic anomalies with oil well signatures as well as the proposed development;
- Table with basic well information: well name, lease, operator, etc.

Terra-Petra will also initiate permitting process with CalGEM to procure procuring all necessary permit forms and applications to successfully survey and decommission the former oil and gas well.

### 3.8.2 Regulatory Setting

Several Federal, State, and local regulations limit the risk of upset during the use, transport, handling, storage, and disposal of hazardous materials. The agencies responsible for enforcing these regulations have developed standards for the handling and cleanup of specific materials, which are determined to pose a risk to human health or the environment. The Federal enforcement agency is the USEPA. Enforcement agencies at the State level include two branches of the California Environmental Protection Agency (CalEPA): DTSC and SWRCB. In addition, CalEPA administers the *"Unified Program,"* which helps businesses comply with administrative requirements, permits, inspections and enforcement activities required by environmental and emergency management programs. The Unified Program is enforced, at the local level, by the CUPA. The CUPA is responsible for protecting the public and environment by overseeing uniform fire code plans, hazardous waste, underground storage tanks, above-ground tanks, hazardous materials, community right-to-know, and accidental release prevention programs. The CUPA for the Redondo Beach and Torrance is the LACoFD Health Hazardous Materials Division with the RBFD authorized as a participating agency for Redondo Beach.

<u>Federal Regulations</u>

Federal agencies that regulate hazardous materials include the USEPA, U.S. Department of Labor Occupational Safety and Health Administration (OSHA), and the U.S. Department of Transportation (DOT). Applicable Federal regulations are contained primarily in Titles 10, 29, 40, and 49 of the Code of Federal Regulations (CFR). In particular, Title 49 of the CFR governs the transport of hazardous materials, and Title 42 of the CFR, Chapter 82 governs solid waste disposal and resource recovery. Some of the major Federal laws include the following:

- Resource Conservation and Recovery Act of 1976 (RCRA);
- Emergency Prevention and Community Right to Know Act of 1986 (EPCRA);
- Toxic Substances Control Act of 1976 (TSCA);
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA);
- Clean Water Act of 1977 (CWA);

- Clean Air Act of 1963 (CAA);
- Asbestos Hazard Emergency Response Act of 1986 (AHERA);
- Hazardous Materials Transportation Action of 1975;
- Federal Insecticide, Fungicide, and Rodenticide Act of 1947;
- National Emission Standard for Hazardous Air Pollutants (NESHAP) – 40 CFR 61 Subpart M;
- Process Safety Management of Highly Hazardous Chemicals (29 CFR §1910.119) and Hazardous Waste Operations and Emergency Response (29 CFR §1910.120); and
- Residential Lead-Based Paint Hazard Reduction Act (1992), also known as Title X.

State Regulations

Primary State agencies with jurisdiction over hazardous materials management – including spill responses and remediation – include DTSC and the SWRCB. Other State agencies involved in hazardous materials management are the California Department of Industrial Relations Occupational Health and Safety Administration (CalOSHA), California Office of Emergency Services (CalOES) – California Accidental Release Prevention implementation, California Department of Fish and Wildlife (CDFW), California Air Resources Board (CARB), California Department of Transportation (Caltrans), California Office of Environmental Health Hazard Assessment (OEHHA) – Proposition 65 Implementation, the California Department of Health Services (DHS), and the California Integrated Waste Management Board (CIWMB). The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol (CHP) and Caltrans. Hazardous materials waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations.

Hazardous chemical and biohazardous materials management laws in California include the following statutes:

- Hazardous Waste Control Act;
- Medical Waste Management Act;
- Hazardous Materials Release Response Plans and Inventory Act;
- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65);
- Hazardous Substances Act;
- Hazardous Waste Management Planning and Facility Siting (Tanner Act);
- Porter Cologne Water Quality Control Act;

- Title 23 of the California Code of Regulations (CCR) Division 6, Chapter 16: Underground Storage Tank Regulations;
- Title 22 of the CCR: Hazardous Waste;
- Title 8 of the CCR, Section 1529: Asbestos;
- California Public Resources Code – Article 4.2 Hazardous Wells Section 3255; and
- SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.

*Government Code Section 65962.5 – DTSC EnviroStor Database (Cortese List)*

The DTSC maintains a database that contains information on properties in California where hazardous substances have been released, or where the potential for a release exists. This database is known as EnviroStor (formerly CalSites) and is one of a number of databases that comprise the Cortese List and Spills, Leaks, Investigations, and Cleanups (SLIC) List. The EnviroStor Database provides a brief history of cleanup activities, contaminants of concern, and scheduled future cleanup activities. The EnviroStor Database also includes properties that have been remediated and certified by DTSC.

*California Public Resource Code Section 3255*

PRC Section 3255 designates authority to CalGEM (formerly DOGGR) to require the inspection, abandonment, re-abandonment, drilling, re-drilling, and production for the purpose of remedying, mitigating, minimizing, or eliminating danger to life, health, and natural resources, the decommissioning of hazardous or deserted facilities, or any other remedy or oilfield operation of on any property in the vicinity of which, or on which, is located any well or facility that the supervisor determines to be a hazardous well, an idle-deserted well, a hazardous facility, or a deserted facility.

*California Code of Regulations– Asbestos and Lead*

The CCR regulate potential asbestos exposure in construction when construction, alteration, repair, maintenance, renovation or demolition of structures, substrates, or portions thereof contain asbestos (8 CCR Section 1529 [a][1][C]). Additionally, in California, materials containing greater than 0.1 percent asbestos by weight are regulated as ACM.

The Title 17 of the CCR, Division 1, and Chapter 8 pertains to all public and residential buildings in California. Pursuant to Title 17 and USEPA regulations, LBP is defined as paint or other surface

coatings containing an amount of lead equal to or greater than 1 milligram per square centimeter ($mg/cm^2$) or more than 0.5 percent (5,000 parts per million [ppm]) by weight. Title 17 also defines a lead hazard as deteriorated LBP, disturbance of LBP or presumed LBP without containment, or any other nuisances which may result in persistent or quantifiable lead exposure. Additionally, worker exposure to materials containing lead during construction work is regulated by 8 CCR Section 1532.1(a). These regulations require worker protection during construction *"where lead or materials containing lead are present."*

Regional Policies and Regulations

*South Coast Air Quality Management District (SCAQMD)*

The SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 defines asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling/cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of asbestos-containing structures, asbestos storage facilities, and waste disposal sites.

The SCAQMD also regulates VOC emissions from contaminated soil through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 sets requirements to control the emission of VOCs from excavating, grading, handling, and treating soil contaminated with volatile organic compounds as a result of leakage from storage or transfer operations, accidental spillage, or other deposition, including hydrocarbons.

*Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan*

The Los Angeles County Department of Public Works (DPW), Environmental Programs Division (EPD), prepares and administers the Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan, which provide direction for proper management of all waste generated within the County. As the County's lead agency, it advises the Los Angeles County Board of Supervisors regarding all waste management issues. EPD implements numerous programs to meet State-mandated solid waste reduction goals, including recycling, composting, source-reduction, household hazardous waste management, and public education programs. These programs regulate USTs in the County's unincorporated areas and 77 cities, including Redondo Beach, to protect groundwater resources.

City of Redondo Beach Local Policies and Regulations

The primary local agency, known as the CUPA, with responsibility for implementing Federal and State laws and regulations pertaining to hazardous materials management is LACoFD Health Hazardous Materials Division with RBFD authorized as a participating agency. LACoFD Health Hazardous Materials Division and RBFD work together to implement the Redondo Beach Local Hazard Mitigation Plan that addresses the City's planned response to emergencies. The CUPA is certified by CalEPA to implement the six State environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code (H&SC) made by Senate Bill (SB) 1082 in 1994. The six consolidated programs are as follows:

- Hazardous Materials Reporting and Response Planning;
- Uniform Fire Code Business Plan;
- Hazardous Waste Generation and On-site Treatment;
- Accidental Release Prevention;
- Aboveground Storage Tank; and
- Underground Storage Tank.

As the designated CUPA for the City, LACoFD Health Hazardous Materials Division maintains the records regarding location and status of hazardous materials sites in the City and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials.

*Redondo Beach General Plan Environmental Hazards/Natural Hazards Element*

The Redondo Beach Environmental Hazards/Natural Hazards Element of the General Plan (1993) contains several policies regarding fire hazards and emergency management. Specifically, it contains safety goals and objectives that create a framework for implementation policies, which relate to the Redondo Beach Local Hazard Mitigation Plan. The objectives that are applicable to the proposed Project and hazardous materials are listed below:

Objective 11.1: Promote and assist in the oversight of the proper operation and upkeep of local hazardous waste facilities, as well as the safe management, handling, and transportation of toxic and hazardous materials through the enforcement of applicable state and local regulations.

*City of Redondo Beach Local Hazard Mitigation Plan*

The City of Redondo Beach developed the Local Hazard Mitigation Plan to broadly increase resiliency in Redondo Beach through six key goals:

- Encourage resiliency within City plans and processes to reduce threats to life and property.
- Maintain basic local government operations and services during and following a hazard event.
- Sustain public outreach and education of hazard risks and proper mitigation activities.
- Improve interdepartmental and interjurisdictional partnerships for greater cooperation.
- Foster a culture of respect and protection for natural systems and the local environment.
- Enhance post-disaster response capacity through civic leadership of local businesses, community organizations, and City residents.

The Local Hazard Mitigation Plan was designed be consistent with California Office of Emergency Services (Cal OES) and Federal Emergency Management Agency (FEMA) requirements.

Following review and approval of the plan by Cal OES and FEMA, the City of Redondo Beach adopted the Local Hazard Mitigation Plan in July 2020, by resolution of the City Council. The Redondo Beach Local Hazard Mitigation Plan is both a reference document and an action plan. It has information and resources to educate readers and decision makers about hazard events and related issues, and a comprehensive strategy that the City and community members can follow to improve resiliency in Redondo Beach.

City of Torrance Beach Local Policies and Regulations

*Torrance General Plan Safety Element*

The Torrance General Plan Safety Element (2010) sets forth policies designed to minimize threats from natural and human-caused hazards. By implementing the Safety Element, the City of Torrance can deliver timely emergency service delivery and focus on the expansion of such services throughout the City. The objectives that are applicable to the proposed Project and hazardous materials are listed below:

Objective S.3: To protect the community from hazards associated with the production, transmission, and processing of petroleum products.

Policy S.3.1 Take appropriate measures to protect citizens from the hazards of oil and gas recovery, production, and transmission.

Policy S.3.2 Require that oil well abandonment and construction near abandoned oil wells comply with the most current local, State, and Federal abandonment standards.

Policy S.3.3 Require all secondary recovery projects to comply with all applicable regulations regarding health, safety, and aesthetics as a condition of approval.

Policy S.3.4 Maintain comprehensive regulations in the Municipal Code that address all aspects of oil and gas recovery, production, and transmission activities.

Policy S.3.5 Ensure the compatibility of land uses near new and future oil recovery activities.

Objective S.4: To reduce the risk associated with the use, storage, transport, or disposal of hazardous waste.

Policy S.4.1 Adopt and strictly enforce the most current regulations governing hazardous waste management.

Policy S.4.2 Minimize exposure of critical facilities and residences to hazardous materials.

Policy S.4.3 Avoid locating new residential development adjacent to or near potentially hazardous industrial activities.

*City of Torrance 2017-2022 Local Hazard Mitigation Plan (2017)*

The City developed the 2017-2022 Local Hazard Mitigation Plan to prevent against, prepare for, respond to, and recover from both natural and man-made emergencies and disasters. The Hazard Mitigation Plan was designed be consistent with FEMA requirements.

Following approval of the plan by FEMA, the City of Torrance adopted the Local Hazard Mitigation Plan in October 2017, by resolution of the City Council. The plan identifies and describes the hazards that threaten Torrance, and how these hazards were selected and prioritized. For each hazard, the plan discusses hazard history, the risk of future hazards, potential impacts of climate change on the hazard, and the vulnerability of the community to the hazard. The Local Hazard Mitigation Plan also provides the mitigation measures to reduce potential risks from hazards, identifies evacuation routes, and provides an overview of the City's existing capabilities to improve resiliency to hazard events.

### 3.8.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 California Environmental Quality Act (CEQA) Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact from hazards or hazardous materials if it would do any of the following:

a) The project would create a significant hazard to the public or the environment through the temporary or routine transport, use, or disposal of hazardous materials.

b) The project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) The project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a 0.25-mile radius of an existing or proposed school.

d) The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would result in a safety hazard or excessive noise for people residing or working in the project area.

f) The project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g) The project would expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires.

*Screened-Out Threshold(s):*

- Threshold (e) (*Public Airport*): The Project site is located approximately 5.75 miles to the south of Los Angeles International Airport (LAX) and is not located within an Airport Land Use Plan. Accordingly, the proposed Project would not result in a safety hazard for people residing in, working in, or visiting the campus. Therefore, for the reasons stated above and as discussed in Section IX, *Hazards and Hazardous Materials* of the Initial Study (IS), this issue will not be analyzed further in this EIR.

- Threshold (g) (*Wildfire*): The Project site is located in a highly urbanized area, surrounded by residential and commercial development. The Project site is located approximately 3.3 miles north of the nearest designated Very High Fire Hazard Severity Zone. As described further in Section 4.0, *Other CEQA* within the *Wildfire* discussion, redevelopment of the existing campus would not exacerbate wildfire risks or otherwise increase public exposure to wildfires. Therefore, for the reasons stated above and as discussed in Section IX, *Hazards and Hazardous Materials* of the IS, this issue will not be analyzed further in this EIR.

Methodology

As previously described, this analysis is based on a Phase I ESA (2019) and a Phase II ESA (2020) prepared by Converse Consultants (see Appendix G). The Phase I ESA included an environmental regulatory database search as well as visual inspection of the Project site and the surrounding vicinity. The Phase II ESA included the collection of soil borings to test for soil and soil vapor on the Project site. Based on the results of the soil testing, ambient air samples were also collected during the Phase II ESA.

### 3.8.4 Project Impacts and Mitigation Measures

Impact Description (HAZ-1)

*a) The project would create a significant hazard to the public or the environment through the temporary or routine transport, use, or disposal of hazardous materials.*

**HAZ-1 The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not create a hazard to the environment or public health through the temporary or routine transport, use, or disposal of hazardous materials. Compliance with Federal, State, and local regulations would ensure that any such impact would be *less than significant*.**

*Construction*

As described in Section 2.0, *Project Description*, the proposed Project involves two phases of development that would demolish and replace the Beach Cities Health Center with new, purpose-built facilities on the existing campus and the vacant Flagler Lot. Construction activities during each phase of development would require transportation, use, storage, and disposal of small quantities of commercially available hazardous materials, including vehicle fuels, oils, transmission fluids, and hydraulic fuels. However, the use of such materials would be in limited quantities (i.e., not commercially reportable) and would be handled in compliance with Federal, State, and local regulations pertaining to their transport, use, or disposal (e.g., Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan as well as the applicable hazardous materials programs administered by LACoFD; refer to Section 3.8.2, *Regulatory Setting*). As such, the potential for hazardous materials release associated with the transport, use, or disposal would be limited to the accidental spill of chemicals, petroleum, oils, and lubricants within the on-site construction staging areas or along the proposed haul routes. (Potential hazards associated with the disturbance of contaminated soils at the Project site are discussed in Impact HAZ-2.)

The primary construction staging areas for equipment and materials would be the vacant Flagler Lot and the existing north surface parking lot, and a temporary unpaved road may be constructed between the two staging areas. However, the staging areas would likely move between construction phases depending on the available area. As described in Section 2.5.1.6, *Construction Activities* the development application(s) for the proposed Project would include a comprehensive Construction Management Plan, to be submitted for review and approval by the Redondo Beach and Torrance Building & Safety Divisions prior to the issuance of demolition, grading, or building permits. In addition to further defining the construction staging agencies the Construction Management Plan would also provide a detailed description of requirements for storage of hazardous materials, construction fueling areas, and spill kits and secondary containment consistent with all applicable Federal, State, and local regulations.

The transport of large quantities of hazardous materials to the Project site, if any, would be subject to applicable Federal, State, and local regulations intended reduce the risk of accidental spills, leaks, fire, or other hazardous conditions. The DOT, Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as enforced by the CHP and Caltrans (refer to Section 3.8.2, *Regulatory Setting*). Compliance with applicable regulations as well as oversight by the appropriate Federal, State, and local agencies would minimize the risk of hazardous materials exposure during transport. Therefore, the proposed Project would result in a *less than significant* impact with regard to the transport of hazardous materials.

*Operation*

Operation of the proposed Project would include limited use and storage of hazardous materials including chemicals such as cleaners, paints, solvents, chlorinated products, vehicle fuels, etc. However, similar to existing conditions, the use of these chemicals of the Project site would be in limited quantities (i.e., not commercially reportable quantities).

The proposed Residential Care for the Elderly (RCFE) Building constructed during Phase 1 would also be a small quantity generator of medical waste (e.g., used syringes, biohazards, etc.), similar to the existing memory care and outpatient medical uses on the campus. Medical wastes generated on-site would continue to be disposed of in special containers located in a secure area of the facility and would be collected regularly. All hazardous materials used on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. The proposed Project would be subject to all of the requirements set forth in Chapter 4 (Small Quantity Generator Requirements) of the H&SC Medical Waste Management Act. Adherence to medical waste regulations for small quantity generators would ensure that impacts related to the storage, transport, and disposal of medical waste would be *less than significant*.

<u>Impact Description (HAZ-2)</u>

*b) The project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.*

**HAZ-2 The proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – could create**

**a hazard to the environment or public health through reasonably foreseeable upset and accident conditions involving the disturbance of hazardous materials during demolition as well as excavation, trenching, and grading. Impacts would be *less than significant with mitigation.***

*Hazardous Building Materials*

As previously described, the Beach Cities Health Center was originally developed as the South Bay Hospital in 1958. Additionally, the Beach Cities Advanced Imaging Building and the existing parking structure located at 512 North Prospect Avenue were constructed in 1989. Physical sampling of ACM and LBP at these buildings was not included in the scope of the Phase I or Phase II ESA. However, due to the age of the existing buildings on-site it is assumed that ACM and LBP are present in the Beach Cities Health Center and the associated Maintenance Building (Converse Consultants 2019, 2020). Similarly, ACM and LBP may be present within the Beach Cities Advanced Imaging Building and the existing parking structure. During the visual site inspection associated with the Phase I ESA, one transformer was observed in the Maintenance Building and three pad-mounted transformers were observed outdoors adjacent to the building. As such, construction workers, campus residents (e.g., Memory Care and Assisted Living residents), employees, and visitors, and other members of the public could be exposed to these hazardous materials during demolition of the existing buildings and hauling of demolition debris from Project site.

A comprehensive survey of ACM, LBP, and PCBs would be conducted by a licensed California Asbestos Consultant prior to and during the demolition activities as required by MM HAZ-1. If ACM is detected during the survey, mandatory compliance with SCAQMD Rule 1403 would require abatement by a licensed California Asbestos Consultant prior to demolition. Asbestos abatement generally includes sealing off an area with plastic and filtering the affected air to ensure that no asbestos fibers are let out into the surrounding environment. Similarly, Title 8 of the CCR, Industrial Relations, would require the abatement of LBP prior to demolition. (LBP abatement procedures are similar to those described for asbestos abatement.) PCBs located in the transformers at the Project site would be disposed of in accordance with USEPA Region 9's PCB Program. These transformers would be replaced with PCB-free equipment in the Southern California Edison (SCE) Substation, which would be located along the eastern perimeter of the Project site, immediately east of the pedestrian promenade (refer to Figure 2-5 and Figure 2-7).

Mold could also potentially occur within the Beach Cities Health Center and the attached Maintenance Building as well as the Beach Cities Advanced Imaging Building and the parking structure located at 512 North Prospect Avenue. Mold growth within the interior or other inaccessible areas of buildings may be released during demolition activities and result in exposure of construction workers, campus residents, employees, and visitors as well as other members of the public. As with ACM and LBP, the Phase I and Phase II ESAs did not conduct physical sampling of mold, so it cannot be conclusively determined whether active mold growth is present within the existing structures at the campus (Converse Consultants 2019, 2020). In addition to testing for ACM and LBP, MM HAZ-1 would require also physical sampling for mold prior to and during demolition activities. If mold is encountered, the construction contractor would follow standard best management practices (BMPs) to remove the affected building using safe and appropriate methods to minimize potential exposure to high concentrations of spores. Some situations would require extra precautions – similar to those used for handling ACM or LBP (i.e., temporary plastic enclosures and air filtering) – to limit the distribution of airborne mold spores.

If not properly abated, the accidental release of ACM, LBP, PCBs, and/or mold could pose a hazard to the environment and public health. However, implementation of MM HAZ-1 and compliance with existing mandatory regulations and abatement procedures for the treatment, handling, and disposal of ACM, LBP, PCBs and mold, would ensure that impacts associated with the proposed Project would be *less than significant with mitigation*.

*Soil Contamination*

Construction of the proposed Project would involve the excavation of substantial amounts of soil and additional earthwork associated with trenching and grading. As described in Section 2.5.1.6, *Construction Activities*, Phase 1 would involve the excavation of approximately 20,000 cubic yards (cy) of soil, necessary to facilitate construction of the proposed subterranean service area and loading dock. Trenching would be required for utilities work, providing connections between the SCE Substation. Additional grading would be required to backfill the basement associated with the Beach Cities Health Center and to level the other areas of the Project site. Phase 2 would include the excavation of approximately 11,000 cy of soil, necessary to facilitate the construction of the basement levels of the proposed parking structure and other service areas. Additional trenching would be required for utility work and grading would be required for site preparation for the proposed building footprints and open space areas. Soil disturbance during excavation, trenching, and grading at the Project site would result in the disturbance of potentially contaminated soil.

Ground disturbing activities (e.g., excavation, trenching, and grading) during Phase 1 and Phase 2 would disturb PCE-contaminated soils, beginning with the excavation of the subterranean levels of the RCFE Building to a depth of 26 feet during Phase 1. Similarly, grading within the vacant Flagler Lot would also encounter PCE-contaminated soils. The soil samples on the vacant Flagler Lot (i.e., B-14 and B-15; refer to Figure 3.8-1) had the great concentrations of PCE on the Project site (Converse Consultants 2020; see Appendix G). During Phase 2 excavation for the subterranean levels of the proposed parking structure, service areas, and other trenching and grading activities during Phase 2 would encounter PCE-contaminated soils. Disturbance of benzene-contaminated soil could occur during Phase 1 with the removal of the existing northern surface parking lot and subsequent excavation and construction activities associated with the proposed RCFE Building. Disturbance of chloroform concentrations could occur during Phase 2 when demolition of the existing parking structure and potentially the Beach Cities Advanced Imaging Building as well as subsequent excavations, grading, and construction activities.

The implementation of MM HAZ-2a through -2d would ensure VOC compounds and contaminated soils are properly detected, removed, and handled during ground disturbing activities. Therefore, the risk of an accidental release of hazardous materials into the environment during construction of the proposed Project would be *less than significant with mitigation*.

*Abandoned Oil and Gas Well*

As previously described, the Phase I ESA identified a previously abandoned and plugged oil and gas well located on the vacant Flagler Lot. The well was drilled in the 1930s and, according to production data, was in operation by Decalta International Corporation from July 1977 to October 1989. The well was no longer in production in November 1989 and is listed by CalGEM as *"abandoned and plugged"* (Converse Consultants 2019). TPH in the heavy oil range was detected in two samples at boring locations within the vacant Flagler Lot. These concentrations are most likely related to the abandoned oil and gas well located at this site (Converse Consultants 2020). (i.e., B-14 and B-15); however, they were well below the DTSC and USEPA residential screening level and do not represent a potential hazard to the environment or public health. Terra-Petra excavaed the well to physically locate it and completed a leak test, which was negative (i.e., no leaks were detected). Terra-Petra ~~is preparing~~prepared a summary report ~~to be~~that was shared with CalGEM, the responsible oversight agency. Following testing of the well, BCHD ~~would~~ enrolled into the CalGEM Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to avoid future liabilities.

The proposed Project has been designed to comply with all applicable CalGEM recommendations including avoiding construction of permanent structures in close proximity to a well. CalGEM defines *"close proximity"* as being within 10 feet from a well. To be considered outside of close proximity, two adjacent sides of a development (e.g., a building) should be no less than 10 feet from the well, with the third side the development no less than 50 feet from the well. The third side should be no less than 50 feet from the well to allow room for the 30 to 40 feet lengths of tubing required for re-abandonment operations. The fourth side shall remain open to the well to allow for rig access in the event that the well requires maintenance or potential re-abandonment. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to the one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts to *less than significant with mitigation*.

*Operation*

As previously described in Section 3.8.1, *Environmental Setting,* BCHD has previously notified the LACoFD Health Hazardous Materials Division and the Los Angeles RWQCB of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. The indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the campus have not experienced vapor intrusion. The foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to convey volatized PCE through carbon filters before outgassing the vapor at a controlled rate. Because PCE is generally only hazardous

*The vacant Flagler Lot, which includes a previously abandoned and plugged oil and gas well would be redeveloped as a one-way driveway and pick-up/drop-off zone during Phase 1 of the proposed Project.*

when encountered in a confined space where it can exceed the CAA limits and OSHA exposure limits (Centers for Disease Control and Prevention [CDC] 2020; Agency for Toxic Substances and Disease Registry [ATSDR] 2019), outgassing vapor to the ambient air would not create a hazardous impact to the surrounding environment. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, operational impacts associated with PCE and would be *less than significant*.

Mitigation Measures (MMs)

***MM HAZ-1*** ***Asbestos-Containing Material (ACM), Lead-Based Paint (LBP), polychlorinated biphenyls (PCBs), and Mold Surveys.*** *Prior to the issuance of a demolition permit by the Redondo Beach Building & Safety Division, the Beach Cities Health District (BCHD) shall retain a licensed contractor to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and potentially the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, BCHD and the licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. During construction the licensed contractor shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed.*

***MM HAZ-2a*** ***Soils Management Plan.*** *Prior to approval of issuance of demolition, grading, or building permit by the Redondo Beach Building & Safety Division and/or approval of a grading plan by the City of Redondo Beach Building & Safety Division and the City of Torrance Building & Safety Division, the Beach Cities Health District (BCHD) shall prepare and submit a Soils Management Plan and a Transportation Plan to the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and Los Angeles Regional Water Quality Control Board (RWQCB) as well as the City of Redondo Beach and City of Torrance, for review.*

*The Soils Management Plan and Transportation Plan shall include, but shall not be limited to the following:*

*Soils Management Plan*

*Affected soils shall be either directly loaded into awaiting trucks for immediate off-site disposal or temporarily stockpiled on plastic sheeting prior to load-out and off-site disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came.*

*Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following:*

*Soil and Material Segregation*

*Overburden soils shall be screened with an Organic Vapor Analyzer (OVA) in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166. Any significant quantities of construction debris encountered during excavation shall be segregated and disposed of in accordance with Federal, State, and local regulations. Soil cuttings during the excavation and installation of soldier piles shall be disposed of off-site with any affected soils from the deep excavation.*

*Stockpile Management*

*The stockpiled soils for load-out shall be segregated by waste classification:*

- *Non-hazardous waste.*
- *Volatile organic compound (VOC)-contaminated non-hazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm.*
- *VOC-contaminated non-hazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and placed in a sealed container (roll-off bin) or directly loaded into a suitable transport truck, moistened with water, and covered with a*

*tarp for off-site transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan.*

*The temporary stockpiles containing affected soils shall be managed as follows:*

- *The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust.*
- *The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.*
- *Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made.*
- *If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations.*
- *During stockpile generation and removal, only the working face of the stockpile shall be uncovered.*

*Decontamination Methods and Procedures*

*Each piece of equipment used for the excavation of affected soils shall have a clean-out bucket or continuous edge across the cutting face of its bucket. No excavation of affected soil shall be permitted with equipment utilizing teeth across the cutting edge of its bucket.*

*Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the on- and off-site distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior*

*surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas.*

*Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out.*

*Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated, but shall be packaged for appropriate off-site disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures:*

- *Non-phosphate detergent and tap-water wash, using a brush if necessary.*
- *Tap-water rinse.*
- *Initial deionized/distilled water rinse.*
- *Final deionized/distilled water rinse.*

*Truck Loading*

*Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed, and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following:*

- *Materials shall be transported to an approved treatment/disposal facility.*
- *No excavated material shall extend above the sides or rear of the truck/trailer.*

- *Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.*

- *The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material off-site.*

*Storm Water Management*

*General construction best management practices (BMPs) identified by the Los Angeles RWQCB shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with Federal, State, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include:*

- *Pumping the standing water into temporary aboveground storage tanks for reuse on-site for dust suppression.*

- *Pumping the standing water through filters and a carbon adsorption filter (if required based on analytical results) prior to discharge to a storm drain.*

- *Pumping the standing water into vacuum trucks for transport and disposal at a recycling facility.*

*Transportation Plan*

*All affected soils shall be transported off-site for lawful management and disposal. Prior to load-out, the construction contractor shall prepare waste profiles for the receiving facility using analytical data from the previous environmental site assessment.*

***MM HAZ-2b*** ***Soil Vapor Monitoring.*** *During soil disturbance activities with the potential to disturb tetrachloroethylene (PCE)-contaminated soil, soil vapor monitoring shall*

*be conducted by the construction contractor using a photoionization detector (PID) 10.6 or 11.7 eV lamp. Use of the PID shall ensure that the Occupational Safety and Health Administration (OSHA) exposure limits for PCE and other volatile organic compounds (VOCs) are maintained. In the event that the OSHA exposure limits are exceeded, work within the confined space would be temporarily stopped until the use of a Soil Vapor Extraction (SVE) vacuum blower reduces it to below this limit (see MM HAZ-2c).*

***MM HAZ-2c*** ***Soil Vapor Extraction (SVE) Equipment.*** *Use of an SVE vacuum blower (e.g., regenerative blowers, rotary lobe blowers, rotary claw blowers, centrifugal fan blowers, etc.) shall be implemented during construction within confined spaces, as necessary, to maintain Occupational Safety and Health Administration (OSHA) exposure limits ~~or trichloroethylene~~ for tetrachloroethylene (PCE) and other volatile organic compounds (VOCs).*

***MM HAZ-2d*** ***Discovery of Contamination.*** *In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer, or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., Los Angeles County Fire Department [LACoFD] and Los Angeles Regional Water Quality Control Board [RWQCB]). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration (OSHA) requirements shall be prepared and in place prior to commencement of work in any contaminated area.*

***MM HAZ-3*** **Well Review Program**. *Prior to demolition or ground-disturbing activities on the vacant Flagler Lot, Beach Cities Health District (BCHD) shall enroll in the California Geologic Energy Management Division's (CalGEM's) Well Review Program. Following enrollment in the Well Review Program CalGEM would:*

- *Identify/confirm the location of the previously abandoned and plugged oil and gas well on the property.*
- *Provide a review of the previously abandoned and plugged oil and gas well located on the Project site. The review process shall consist of determining the abandonment status of the well by examining past plugging operations, and then comparing the abandonment status with current abandonment standards.*
- *Provide an evaluation of all known wells located on the development site property. The evaluation process will consist of: 1) verifying that the previously abandoned and plugged oil and gas well has a competent surface plug; and 2) verifying the wells are not leaking any fluids or gas. BCHD shall be responsible for the removal of all metal plates attached to the top of casings of the well prior to the evaluation to prevent the buildup of methane gas underneath metal plates. Following evaluation, a metal identification plate shall be welded (without full bead) to the top of the well casing to allow any potential gas leakage to vent out of the casing and prevent pressure from building up in the wellhead. For identification purposes, the metal identification plate shall show the well's name and Assessor Parcel Identification number.*
- *Ensure proper well restoration following evaluation. Proper well site restoration shall include the removal of all associated well equipment, junk, and debris and any well excavation needs to be filled with earth, compacted properly to prevent settling, and graded over. Pursuant to California Code of Regulations (CCR) Section 1776, well site restoration must be completed within 60 days following the evaluation of a well.*
- *Issue a Well Review Letter to BCHD and local permitting agencies (i.e., the City of Redondo Beach and the City of Torrance). The Well Review Letter will list the current status of all known wells located on the development site property, and it will provide other important information associated with development near oil or gas wells.*

*BCHD shall adhere to all recommendations provided by CalGEM, which may include maintaining rig access to the well, avoiding building over or in close proximity to the well, and implementing surface mitigation measures that are determined necessary by CalGEM. Surface mitigation measures may include*

*installation of venting systems for wells, venting systems for parking lots, patios, and other hardscape, methane barriers for building foundations, methane detection systems, and collection cellars for well fluids by a licensed Professional Engineer. The permitting of surface mitigation measures shall fall under the authority of the City of Redondo Beach and the City of Torrance.*

Residual Impacts

With implementation of standard regulatory measures, standard BMPs, MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3, potential impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be *less than significant*.

Impact Description (HAZ-3)

*c) The project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a 0.25-mile radius of an existing or proposed school.*

**HAZ-3 The proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a 0.25-mile radius of an existing or proposed school. Compliance with Federal, State, and local regulations would ensure that any such impact would be *less than significant.***

As described in Section 2.2.1, *Project Location*, Towers Elementary School and Beryl Heights Elementary School are located within a 0.25-mile radius of the Project site. In particular, Towers Elementary School is located approximately ~~300~~ 350 feet to the east of the existing campus. Based on a review of the Los Angeles Unified School District (LAUSD) website, no new schools are proposed within the vicinity of the campus.

*Multiple schools are located in the vicinity of the Project site, the nearest of which is Towers Elementary School (pictured above), located approximately ~~300~~ 350 feet east of the campus.*

*Construction*

As described in Impact HAZ-1, each phase of construction would require transportation, use, storage, and disposal of small quantities of commercially available hazardous materials, including vehicle fuels, oils, transmission fluids, and hydraulic fuels. However, the use of such materials would likely be in limited quantities (i.e., not commercially reportable) and would be handled in compliance with Federal, State, and local regulations pertaining to their transport, use, or disposal (e.g., Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan as well as the hazardous materials programs administered by LACoFD; refer to Section 3.8.2, *Regulatory Setting*). As such, the potential for hazardous materials release associated with the transport, use, or disposal would be limited to the accidental spill of chemicals, petroleum, oils, and lubricants within the construction staging areas on the Project site or along the proposed haul routes (refer to Section 2.5.1.6, *Construction Activities*). As described in Section 2.5.1.6, *Construction Activities* the development application(s) for the proposed Project would include a comprehensive Construction Management Plan, to be submitted for review and approval by the Redondo Beach and Torrance Building & Safety Divisions prior to the issuance of demolition, grading, or building permits. In addition to further defining the construction staging agencies the Construction Management Plan would also provide a detailed description of requirements for storage of hazardous materials, construction fueling as well as spill kits and secondary containment.

Compliance with applicable regulations as well as oversight by the appropriate Federal, State, and local agencies would minimize the risk of hazardous materials exposure during transport. Therefore, the proposed Project would result in a *less than significant* impact.

*Operation*

After construction is complete and the heavy equipment is removed from the Project site, the potential for hazardous spills would be similar to existing conditions at the Project site. As described in Impact HAZ-1, BCHD would continue to use, store, and dispose of hazardous materials, substances, and waste in accordance with applicable Federal, State, regional, and local policies and regulations. Therefore, operational impacts related to hazardous emissions and hazardous materials, substances, and waste within a 0.25-mile radius of a school would be *less than significant*.

Under the proposed Project, the existing Maintenance Building and connected substation would be demolished and redeveloped with open space and pedestrian walkways. A new electric service would be developed in conjunction with SCE – including the development of a new on-site distribution system. The proposed design for the electrical distribution system includes a SCE Substation, medium voltage distribution system, and generator yard, which would be located along the southern end of the Project site.

Electricity powerlines, substations, transformers and other electrical sources such as common electrical appliances and wiring, all emit extremely low frequency (ELF) electric and magnetic fields (EMF). For substations and transformers, the magnetic fields at distances of 5 to 10 meters (approximately 16 to 33 feet) away are generally indistinguishable from typical background levels in the home. Since the late 1970s, questions have been raised whether exposure to these ELF EMF produces adverse health consequences.

Nationally and internationally recognized scientific organizations and independent regulatory advisory groups have been organized to conduct scientific reviews of the EMF research and peer reviewed publications. Their ability to assemble experts from a variety of disciplines to review the full body of research on this complex issue gives their reports credibility. Without exception, these major reviews have reported that the body of data, as large as it is, does not demonstrate that exposure to power-frequency magnetic fields causes cancer or poses other health risks, although the possibility cannot be dismissed. Because of the uncertainty, most reviews recommend further research, and, appropriately, research is ongoing worldwide.

In October 2005, the World Health Organization (WHO) convened a Task Group of scientific experts to assess any risks to health that might exist from exposure to ELF electric and magnetic fields in the frequency range >0 to 100,000 Hertz (Hz) (100 kilohertz [kHz]). Following a standard health risk assessment (HRA) process, the Task Group concluded that there are no substantive health issues related to ELF electric fields at levels generally encountered by members of the public. Much of the scientific research examining long-term risks from ELF magnetic field exposure has focused on childhood leukemia associated with average exposure to residential power-frequency magnetic field above 0.3 to 0.4 microteslas (μT). However, there is limited evidence of carcinogenicity in humans and less sufficient evidence for carcinogenicity in experimental animals. Evidence is weakened by methodological problems, such as potential selection bias. In addition, there are no accepted biophysical mechanisms that would suggest that low-level exposures are involved in cancer development. Evidence related to childhood leukemia is not strong enough to be considered causal. A number of other adverse health effects have been

studied for possible association with ELF magnetic field exposure. These include other childhood cancers, cancers in adults, depression, suicide, cardiovascular disorders, reproductive dysfunction, developmental disorders, immunological modifications, neurobehavioural effects and neurodegenerative disease. The WHO Task Group concluded that scientific evidence supporting an association between ELF magnetic field exposure and all of these health effects is much weaker than for childhood leukemia. In some instances (i.e., for cardiovascular disease or breast cancer) the evidence suggests that these fields do not cause them. In conclusion, the scientific evidence does not establish that exposure to ELF EMF found around the home, the office or near powerlines and other electrical sources is a hazard to human health.

To protect carriers of electronic medical implants, several safeguards are built into the devices to shield them from normal daily interference. Manufacturers often design medical implants to operate normally during an exposure to electromagnetic fields commonly encountered in residential, commercial or medical environments. The International Organization for Standardization recommend pacemakers and ICDs give resistance up to 5.4 kilovolts per meter (kV/m) (for 60 Hz electric fields). Given that the proposed 4.12 kV substation would be enclosed and setback from publicly accessible areas both on and off-site, operation of the new electrical distribution system at the Project site would not interfere with electronic medical implants.

Therefore, potential hazardous impacts associated with the proposed SCE Substation would be less than significant.

Impact Description (HAZ-4)

*d) The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.*

**HAZ-4 The proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 65962.5, which could create a significant hazard to the public or the environment. Compliance with all applicable regulations and mitigation measures would reduce this impact to *less than significant with mitigation*.**

The Project site is located in proximity to one hazardous waste site listed in the DTSC EnviroStor Database (i.e., Edison Pipeline and Terminal Company Redondo) located approximately 1 mile

west of the Project site at 1100A Harbor Drive (Converse Consultants 2019, 2020; DTSC 2020; see Appendix G). However, this site is currently undergoing closure and, given the distance as well as the existing development separating the hazardous waste site from the Project site, implementation of the proposed Project would not upset the hazardous waste site or create a significant hazard to the public or environment (Converse Consultants 2020). The only DTSC-listed cleanup site requiring further action and located within 1 mile of the Project site is the former Redondo Beach Police Department shooting range off-site property. However, given the distance hydraulic gradient in relation to the Project site, potentially occurring contaminants at this site are unlikely to affect the Project site (Converse Consultants 2020). The Shell gas station located at 1200 Beryl Street is listed as a LUST cleanup site due to gasoline contamination. However, the site has been designated as *"completed-case closed."*

Additionally, the former dry cleaner site located at 1232 Beryl Street is listed in the GeoTracker database as *"open-inactive,"* which means no regulatory oversight activities are being conducted by the lead agency (SWRCB 2020b). However, as described in Impact HAZ-2, the Phase II ESA, which involved soil sampling and indoor air quality sampling, determined that the former dry cleaner is suspected to be the source of the detected PCE, as concentrations of PCE generally decrease to the south with distance from the cleaners' location (Converse Consultants 2020). BCHD notified the LACoFD Health Hazardous Materials Division and the Los Angeles RWQCB and will work with the agencies and other public entities to address these sampling results and identify the responsible party. Long-term clean-up of PCE by the responsible party will occur as a separate remediation project. Nevertheless, the implementation of MM HAZ-2a through -2d would ensure VOC compounds and contaminated soils are properly detected, removed, and handled during ground disturbing activities associated with the proposed Project.

While the Project site is included on several databases for its operation as a small quantity generator of hazardous waste, the campus is not included in the DTSC EnviroStor Database or on the SWRCB GeoTracker databases compiled pursuant to Government Code Section 65962.5. The vacant Flagler Lot is listed on the California Water Board's GeoTracker database due to a LUST cleanup site, with diesel being the contaminant of concern. However, the site is designated as *"completed-case closed,"* which means a closure letter or other formal closure decision document has been issued for the site (SWRCB 2020a).

Residual Impacts

With implementation of MM HAZ-2a through -2d, impacts to sites listed of hazardous materials sites complied pursuant to Government Code Section 65962.5, and as such, would not create a significant hazard to the public or the environment.

Impact Description (HAZ-5)

*f) The project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.*

**HAZ-5 The proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be *less than significant.***

The Project site is located within the service area of the RBFD and Redondo Beach Police Department (RBPD) (see Section 3.13, *Public Services*). The proposed Project would be built in accordance with the applicable State and local building codes (refer to Section 3.6, *Geology and Soils*) as well as all appropriate fire codes. For example, RBFD would review the proposed Project using the Building Plan Fire Code Checklist.

State Route (SR-) 1 and SR-107, located approximately 0.5 miles west and 1.5 miles east of the Project site, respectively, are designated Primary Disaster Routes by the County of Los Angeles (County of Los Angeles Department of Public Works 2013). The proposed Project does not propose changes in, obstructions to, or reconfigurations of public evacuation routes. Therefore, the proposed Project would not result in physical interference or impairment to implementation of this existing emergency and evacuation plan.

Construction activities associated development during Phase 1 and Phase 2 of the proposed Project would add vehicles (e.g., construction deliveries, construction worker vehicles, etc.) to regional and local roads that could increase congestion. Construction trucks would access the site from one of the existing driveways along North Prospect Avenue. Haul trucks would exit the Interstate (I-) 405 freeway on 190$^{th}$ Street or Hawthorne Avenue to 190$^{th}$ Street and reach the site using Del Amo Street to North Prospect Avenue. Construction entry to the Project site would be provided along North Prospect Avenue where construction flaggers would be stationed to direct construction traffic and maintain public safety. Additionally, emergency services vehicle access points would

be maintained at North Prospect Avenue and Beryl Street. Fire lanes would be maintained at all times during construction work. The RBFD, ~~and~~ RBPD, Torrance Fire Department (TFD), and Torrance Police Department (TPD) would also have access to the Project site 24 hours per day via fence-mounted lockboxes to open gates securing the Project site. As described further in Section 2.5.1.6, *Construction Activities*, all work would be subject to a Construction Traffic Control Plan to be approved by the Redondo Beach and Torrance Building & Safety Divisions (see MM T-1 in Section 3.14, *Transportation*). The Construction Traffic Control Plan would identify designated haul routes and construction staging areas, traffic control procedures, emergency access provisions, construction crew parking, and avoidance of traffic impacts during construction. Therefore, impacts related to emergency access would be *less than significant* (see Section 3.14, *Transportation*).

*Operation*

As described in Section 2.5.1.3, *Proposed Access, Circulation, and Parking*, in the event of an emergency on the campus, the Project site could be accessed from the existing driveways along North Prospect Avenue, the proposed one-way driveway off of Beryl Street, and the proposed service vehicle entrance off of Flagler Lane. Similar to the existing perimeter road that borders the campus, the proposed pedestrian promenade would wrap around the campus and would provide emergency vehicle access. The pedestrian promenade would connect the existing southern and northern driveways and would provide direct access to the southern side of the RCFE Building. Secondary emergency access would be provided to the north of the RCFE Building using *"grass-crete"* (i.e., permeable pavers with space for grass to grow).

Prior to operation, BCHD would coordinate with the RBFD, ~~and~~ RBPD, TFD, and TPD to prepare an Emergency Plan for the campus. Additionally, BCHD would utilize training procedures and an operational handbook that provides processes and procedures for BCHD staff to provide the first responder services.

Therefore, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be *less than significant*. See also Section 3.13, *Public Services* for analysis of increased demand on emergency response services (e.g., fire and police protection).

Cumulative Impacts

Cumulative development within the Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach would have the potential to expose the surrounding public to hazards and hazardous materials through development or redevelopment of properties that may be contaminated from either historical or ongoing uses. Approved and pending projects in the vicinity (refer to Figure 3.0-1) are expected to transport, use, and store hazardous materials. However, the severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. The majority of projects located in close proximity to the Project site are small scale redevelopments (e.g., 1- to 2-unit additions to existing residential uses). Therefore, the potential for exposure to hazards and hazardous materials would be minimal. Additionally, large-scale cumulative projects, or cumulative projects that could affect a site listed in the DTSC EnviroStor Database (Cortese List) would be required to undergo individual environmental review, including review of potential impacts related to hazards and hazardous materials that are applicable to that particular development site and proposed use.

If ACM, LBP, PCBs, or mold are found to be present in buildings planned for demolition or renovation, or if soil and groundwater contamination are found to be present on sites of planned and future development, these conditions would require appropriate abatement and/or remediation consistent with all applicable Federal, State, and local regulations. Similarly, the transport of hazardous materials would be subject to applicable Federal, State, and local regulations intended reduce the risk of accidental spills, leaks, fire, or other hazardous conditions. With implementation of MM HAZ-1, HAZ-2a through -2d, and HAZ-3, potential impacts associated with hazards and hazardous materials would be reduced to less than significant. Therefore, the proposed Project *would not substantially contribute to cumulatively considerable impacts*.

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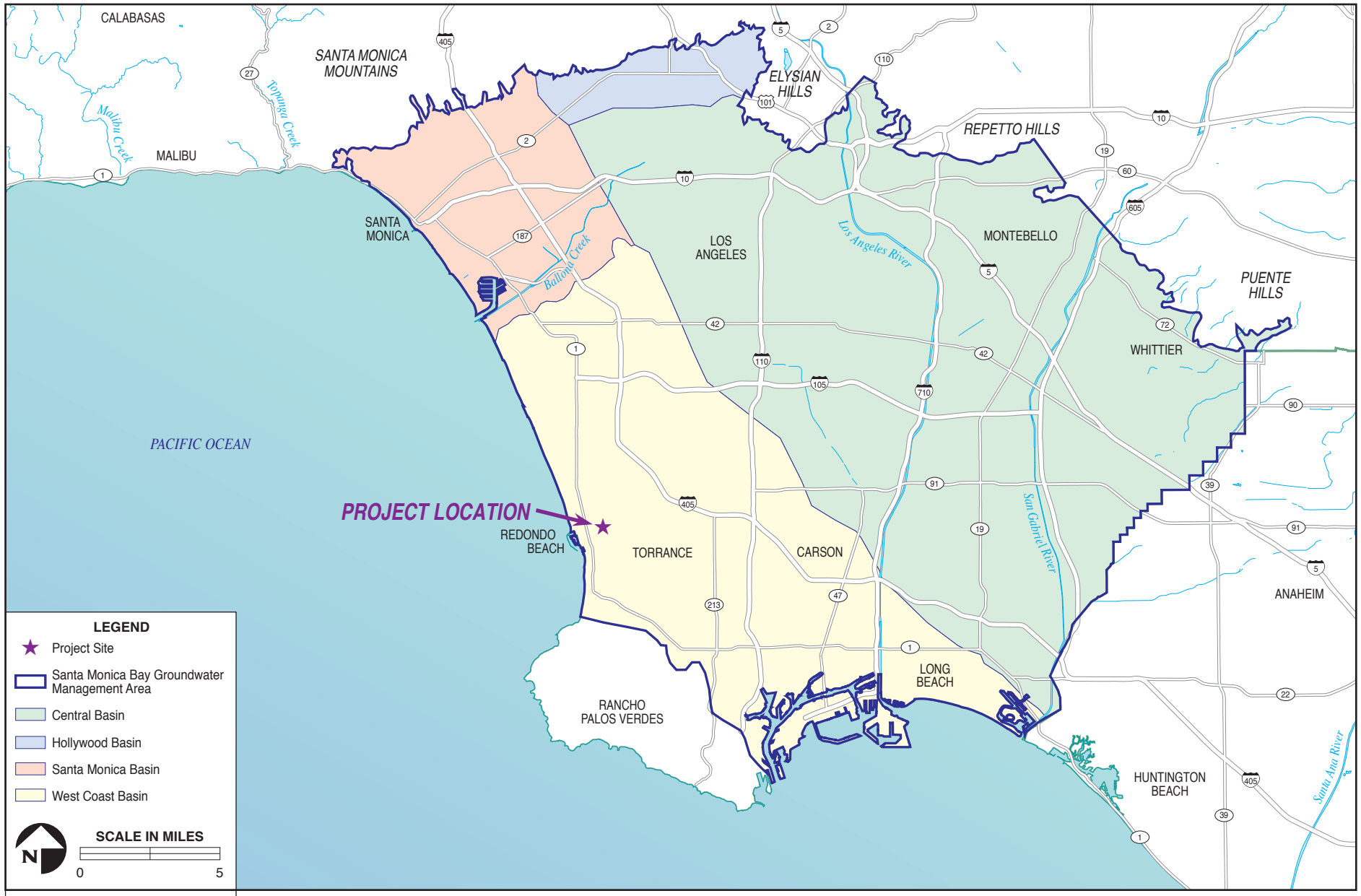
## 3.9 HYDROLOGY AND WATER QUALITY

This section of the Environmental Impact Report (EIR) discusses the potential impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) on surface water and groundwater resources Redondo Beach and Torrance in the immediate vicinity of the Project site. The discussion focuses on surface water, groundwater, flooding, coastal processes and hazards (e.g., sea level rise and coastal flooding), and other drainage conditions on the Project site and in the surrounding watersheds. Related issues addressed in other sections of this EIR include: domestic water infrastructure and supply in Section 3.15, *Utilities and Service Systems*; groundwater basin geology and groundwater-related geotechnical hazards in Section 3.6 *Geology and Soils*; and the potential for groundwater contamination from hazardous materials in Section 3.8, *Hazards and Hazardous Materials.*

### 3.9.1 Environmental Setting

Watershed and Regional Setting

Redondo Beach and Torrance – including the BCHD campus – are located within the West Coast Subbasin of the Coastal Plain of Los Angeles County Watershed Basin, commonly referred to as the *"West Coast Basin."* The West Coast Basin encompasses 91,300 acres and is bounded on the north by the Ballona Escarpment (a bluff just south of Ballona Creek), on the east by the Newport-Inglewood fault zone, on the south by the Palos Verdes hills, and on the west by the Pacific Ocean (California Department of Water Resources [DWR] 2004). The Los Angeles River crosses the West Coast Basin through the Dominguez Gap and the San Gabriel River crosses the West Coast Basin through the Alamitos Gap; both rivers then outlet into San Pedro Bay (DWR 2004).

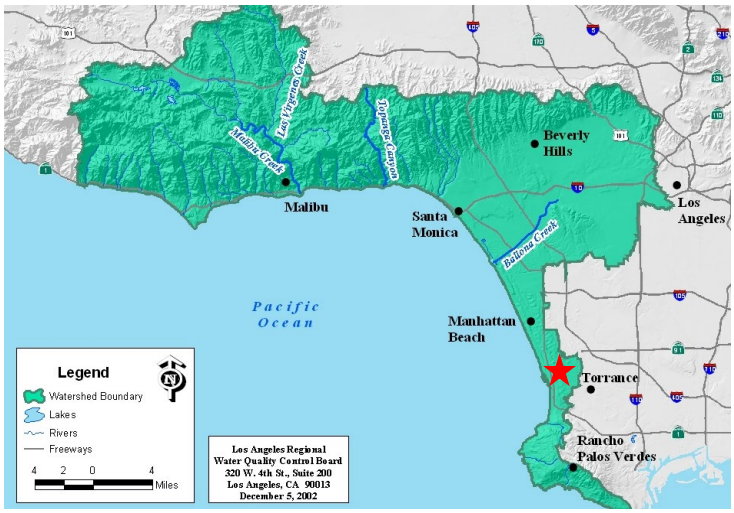



wood.

**Regional Watershed**

**FIGURE 3.9-1**

Redondo Beach and Torrance are located within the Santa Monica Bay Watershed Management Area (WMA) and the Dominguez Channel WMA of the Los Angeles Regional Water Quality Control Board (RWQCB). The southern portion of Redondo Beach (i.e., south of Grant Avenue) and western portions of Torrance – including the BCHD campus – are located within the Santa Monica Bay WMA. The northern portion of Redondo Beach and the majority of Torrance are located within the Dominguez Channel WMA. These two WMAs are included in the Beach Cities Enhanced Watershed Management Program (EWMP). Management groups of the Beach Cities EWMP include the cities of Manhattan Beach, Hermosa Beach, Redondo Beach, Torrance, and the Los Angeles County Flood Control District (LACFCD).




*The Project site (denoted by the red star) located within the Santa Monica Bay WMA, between Topanga Canyon Creek and Ballona Creek sub-watersheds, where the topography causes runoff to flow to the Santa Monica Bay.*

The Santa Monica Bay WMA encompasses an area of 414 square miles and includes several watersheds between the southern Ventura-Los Angeles County line and downtown Los Angeles (State Water Resources Control Board [SWRCB] 2014, 2018). The Santa Monica Bay WMA drains the Santa Monica Mountains and coastal portions of the cities located along the Santa Monica Bay, including the cities of Malibu, Santa Monica, Los Angeles, El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach, Palos Verdes Estates, and Rancho Palos Verdes. Headwaters of the Santa Monica Bay Watershed originate from the crest of the Santa Monica Mountains and are conveyed throughout the watershed by Ballona Creek, Malibu Creek, Topanga Creek, and numerous tributaries (Los Angeles RWQCB 2014). In the southern and eastern parts of the watershed, surface water is also generated as runoff and transported through storm drains and channels because these areas are highly urbanized. The Santa Monica WMA drains generally to the southwest and discharges directly to the Santa Monica Bay and Pacific Ocean (SWRCB 2014, 2018). The Santa Monica Bay is located adjacent to one of the most populated and urbanized coastal metropolitan areas in the U.S., and discharge of treated municipal, commercial, and industrial runoff, cooling water, and wastewater impacts regional water resources, including inland

surface waters, estuarine waters, and marine waters, such as wetlands, lakes, rivers, estuaries, lagoons, harbors, bays, and beaches.

Local Surface Water Hydrology and Drainage

Portions of both Redondo Beach and Torrance are bounded to the west by the Pacific Ocean. Except for parks, landscaping, and active construction sites with exposed soils, the Project site and vicinity are largely developed with buildings, roadways, and paved surface parking lots that prevent natural infiltration. Surface water within the cities is generally limited to sheet flow (i.e., overland flow or downslope movement of water taking the form of a thin, continuous film) to curbed gutters, which empty into the municipal storm drain system. The nearest waterbodies to the Project site are the Dominguez Channel, a major regional drainage facility located approximately 5.5 miles to the east, Ballona Creek, located approximately 9 miles to the north, and the Santa Monica Bay of the Pacific Ocean, located approximately 1 mile to the east.

*Stormwater Drainage and Infrastructure*

The stormwater drainage infrastructure network within Redondo Beach is comprised of a cooperative multi-jurisdictional system with approximately 25 percent of the facilities operated and maintained by the City of Redondo Beach Department of Public Works (DPW) and the remaining 75 percent of facilities maintained by the LACFCD. The storm drain network includes catch basins at street level and storm drains beneath local streets that collect and convey stormwater and dry weather (i.e., non-stormwater) runoff within Redondo Beach to one or more of 13 ocean drainage outfall pipes along the shoreline. The majority of the storm drains are located in northern portion of Redondo Beach as the elevated topography of portions of the southeastern portion of Redondo Beach allows for better natural drainage and discharge to water bodies. Stormwater and dry weather runoff collected within Redondo Beach follow three general patterns:

1. Stormwater collected from the north and northeastern portions Redondo Beach is carried out of the City through the storm drain system into Dominguez Channel to the east;
2. Stormwater collected from the southern portion Redondo Beach is conveyed directly to the Pacific Ocean through one of 13 drainage outfalls located along the southwestern shoreline of the City (south of Hermosa Beach); and
3. Water that is collected in one of five different sumps or sump pumps located throughout the City that is force-pumped back into and through the system and drained through one of the ocean drainage outfall pipes.

In addition to the storm drain network, there are three City-operated sumps and pump stations and two City-operated independent sump pumps that collect stormwater and dry weather runoff into sumps throughout Redondo Beach (City of Redondo Beach 1993). This excess water is then pumped up into gravity drains convey the water directly to the Pacific Ocean through the drainage outfalls. Pollution of the Redondo Beach storm drain system is prevented through implementation of the City's National Pollutant Discharge Elimination System (NPDES) permit, which includes stormwater and urban runoff discharge into municipal storm drain systems (refer to Section 3.9.2, *Regulatory Setting*).

*Water Quality*

Urban runoff – including stormwater and dry weather runoff – contains a wide range of debris and pollutants. Impervious surfaces increase the volume and rate of urban runoff and can result in degraded surface water quality. Stormwater and dry weather runoff carrying increased concentrations of surface water pollutants can have harmful effects on drinking water, recreational water, and wildlife.

Surface water pollutants originate from two types of sources:

- **Point Sources** refer to discrete discharges of surface water pollutants from specific generators into receiving waters, including pipes or man-made ditches. Point sources are regulated in accordance with the National Pollutant Discharge Elimination System (NPDES) program (see Section 3.9.2, *Regulatory Setting*).
- **Non-Point Sources** refer to stormwater and dry weather runoff that washes, scours, and intercepts pollutants from the air and ground, including solid waste, leaked motor oil, or heavy metals or chemicals deposited on pavements or vegetation. Urban runoff includes all surface water draining from streets, parking lots, driveways, and landscaping that flows through the storm drain system to treatment facilities and ultimately to Santa Monica Bay.

Two principal water quality plans are applicable to Redondo Beach and the Santa Monica Bay: the California Ocean Plan (Ocean Plan) (2019) and the Water Quality Control Plan for the Los Angeles Basin (Los Angeles Basin Plan) (2014). For coastal sites, the Ocean Plan includes objectives for the protection of marine water quality. Under the Los Angeles Basin Plan, urban runoff must meet guidelines set by the Los Angeles RWQCB to retain the beneficial use of the receiving water bodies. The Los Angeles Basin Plan defines beneficial uses within Redondo Beach as industrial service supply, navigation, commercial and sport fishing, marine and wildlife habitat including rare, threatened, or endangered species, migration of aquatic organisms, shellfish harvesting, and spawning, reproduction, and/or early development habitat for fish (Los Angeles

RWQCB 2019b). The Los Angeles Basin Plan also defines beneficial uses of Santa Monica Bay as industrial service supply; navigation; contact and noncontact water recreation; commercial and sport fishing; estuarine habitat; marine and wildlife habitat; preservation of biological habitats; migration of aquatic organisms; rare, threatened or endangered species; shellfish harvesting, spawning, reproduction, and/or early development of fish (Los Angeles RWQCB 2019b).

The location of the Santa Monica Bay downstream of the Los Angeles metropolitan area has resulted in adverse impacts to water quality. In response to these conditions and subsequent lawsuits, a consent decree was issued in 1999 between the U.S. Environmental Protection Agency (USEPA), Heal the Bay, Inc., and BayKeeper, Inc. to establish Total Maximum Daily Loads (TMDLs) for pollutants in the Santa Monica Bay, necessary to meet Federal water quality standards. The consent decree also mandated the establishment of best management practices (BMPs) to address water quality concerns in the Santa Monica Bay. In order to address water quality impairments in the Santa Monica Bay, the Los Angeles RWQCB and USEPA developed two TMDLs: the Santa Monica Bay Bacteria Dry Weather TMDL (2002) and the Santa Monica Bay Bacteria Wet Weather TMDL (2002). [1] Two additional TMDLs were approved by Los Angeles RWQCB and the USEPA, Santa Monica Bay Total Maximum Daily Loads for Dichlorodiphenyltrichloroethanes (DDTs) and PCBs (2012) and Santa Monica Bay Nearshore and Offshore Debris TMDL (2010). Revisions to the Santa Monica Bay Nearshore and Offshore Debris TMDL were made in 2019 and adopted by the Los Angeles RWQCB.

To improve the condition of the Santa Monica Bay and meet TMDLs, applicants of projects and activities that may result in pollutant discharges are required to achieve pollutant load reduction targets through various means, including implementation of projects identified in the Watershed Management Plans (WMPs) and EWMPs under the stormwater discharge permits. There are also collaborative and integrated watershed-wide planning and implementation efforts, such as the Storm Water Strategy, an effort led by the SWRCB to sustainably manage and utilize stormwater in California to support water quality and water availability, and the Integrated Water Resource Management Plan (IRWMP) for the Los Angeles metropolitan area, including the availability and allocation of bond funding to facilitate and contribute to water quality improvement planning and implementation efforts in the region.

The Santa Monica Bay Restoration Commission (SMBRC) 2018 Update of the Bay Restoration Plan notes that substantial progress had been made in the last 30 years in improving water quality

[1] A Total Maximum Daily Load (TMDL) is a regulatory term in the Clean Water Act (CWA), describing a plan for restoring impaired waters that identifies the maximum amount of a pollutant that a body of water can receive while still meeting water quality standards.

in the Santa Monica Bay. However, both Redondo Beach and the Santa Monica Bay are identified as impaired water bodies under Clean Water Act (CWA) Section 303(d) (SWRCB 2016). As listed in ~~**Error! Reference source not found.**~~Table 3.9-1, there are impairments related to three types of pollutants in Redondo Beach and five types of pollutants in Santa Monica Bay.

**Table 3.9-1. Impaired Water Bodies within the Vicinity of the Project Site**

| Water Body Name | Water Body Extent | Listing Category | Pollutant | Potential Source |
|---|---|---|---|---|
| Redondo Beach – Coastal & Bay Shoreline | 1.49 miles | 4A | DDT (tissue) | Source Unknown |
| | | | Indicator Bacteria | Nonpoint |
| | | | PCB (tissue) | Source Unknown |
| Santa Monica Bay Offshore/Nearshore – Bay & Harbor | 146,645 acres | 5 | Arsenic | Source Unknown |
| | | | DDT (tissue) | Source Unknown |
| | | | Mercury | Source Unknown |
| | | | PCBs (sediment) | Source Unknown |
| | | | Trash | Source Unknown |

Notes: DDT = Dichlorodiphenyltrichloroethane; PCBs = Polychlorinated biphenyls; Category 4A means the item on the 303(d) list is being addressed by an USEPA approved TMDL; Category 5 means the item on the 303(d) list has listed pollutants that require the development of a TMDL.
Source: SWRCB 2017.

In addition, the 2018 Update of the Bay Restoration Plan observed that while existing water quality improvement programs have achieved significant reduction of pollutant loading, many new contaminants are emerging and causing concern. The emerging contaminants include, but are not limited to, polybrominated diphenyl ethers (PBDEs), which are used primarily as flame retardants, perfluorinated chemicals that are used as stain repellants, and other pharmaceuticals or other personal care products that may harm aquatic life or the environment (SMBRC 2018).

Groundwater

As described in Section 3.6, *Geology and Soils*, Redondo Beach and Torrance are located within the West Coast Groundwater Basin (Basin), a subbasin of the Los Angeles Groundwater Basin. The Basin underlies 160 square miles and extends in a southwesterly direction along the coast from the Newport-Inglewood Uplift to the Santa Monica Bay. The principal aquifers present in the Basin include: Semiperched; Bellflower; Gaspur; Bellflower; Gardena; Gage; Lynwood; Silverado; and Unammed (DWR 2004). Depth to groundwater within the Semiperched Aquifer ranges from nearly 10 feet above mean sea level (MSL) to more than 60 feet below MSL (DWR 2004; Water Replenishment District of Southern California [WRD] 2020). (The Semiperched Aquifer is located closest to the ground surface and is characterized by a semi-pervious layer,

through which flow into or out of the aquifer can take place.) The highest water levels are along the West Coast Basin Seawater Intrusion Barrier; they decrease to the east where they are at their lowest elevations in the City of Gardena between the Charnock Fault and Newport-Inglewood Uplift, both of which are geologic structural features that partially restrict groundwater flow.

In 1961, the Basin was adjudicated, which limits the allowable annual extraction of groundwater per water rights holder within the Basin in order to prevent seawater intrusion and an unhealthy groundwater level. As part of the adjudication, the court appointed the DWR to serve as Watermaster to account for all water rights and groundwater extraction amounts per year. Since the adjudicated groundwater production is substantially higher than the natural recharge of the Basin, the California State Legislature created the WRD to manage, regulate, and replenish the Basin. Each year WRD determines the amount of supplemental recharge that is needed for the Basin based upon annual groundwater extractions and groundwater levels. As part of the recharge and protective duties, WRD procures imported water and recycled water for the West Coast Basin Barrier Project and Dominguez Gap Barrier Project to prevent seawater intrusion. Following its inception, WRD implemented the Regional Groundwater Monitoring Program (RGWMP) as a program designed to track groundwater levels and groundwater quality in the WRD service area in the effort to ensure the sustainability of groundwater as a reliable resource.

*Groundwater Recharge*

Groundwater recharge to the Basin generally occurs through natural underflow from the Central Basin through and over the Newport-Inglewood fault zone as well as through injection of imported water and recycled water into wells of the seawater intrusion barrier (DWR 2004; U.S. Geological Survey [USGS] and SWRCB 2012). The general regional groundwater flow pattern is southward and westward from the Central Coastal Plain toward the Pacific Ocean (DWR 2004). However, groundwater flow directions are controlled by the engineered recharge and by groundwater pumping from the many hundreds of wells distributed across the region (USGS and SWRCB 2012). Minor replenishment to the Basin occurs from infiltration of surface inflow from both the Los Angeles and San Gabriel Rivers into the uppermost aquifers. Other minor sources of recharge by infiltration from the surface include return irrigation water from fields and lawns, industrial waters, and other applied surface waters (DWR 2004). Surface water flows from upland areas do not substantially contribute to recharge in the immediate vicinity of Redondo Beach and Torrance, however, because the water is generally directed through storm drains or other channelized features that do not allow the water to infiltrate permeable soils.

*Groundwater Quality*

In the West Coast Basin, the most critical issue related to groundwater quality is high total dissolved solids (TDS) along the Pacific Ocean due to seawater intrusion as identified by DWR. Seawater intrusion occurs if too much freshwater is pumped from the aquifer system, allowing saltwater to migrate landward and potentially infiltrate the Basin. If a pumping well is close to the landward migrating freshwater/saltwater interface, saltwater could enter the well and contaminate the water supply. Seawater intrusion occurs in the Basin zone along the Santa Monica Bay. Two seawater barrier projects are currently in operation to address and prevent seawater intrusion. The West Coast Basin Barrier Project runs from the Los Angeles Airport to the Palos Verdes hills. The Dominguez Gap Barrier Project covers the area of the Basin bordering San Pedro Bay. Injection wells along these barriers create a groundwater ridge, which inhibits the inland flow of salt water into the subbasin to protect and maintain groundwater elevations (DWR 2004).

Groundwater quality is addressed at a State level through the DWR Sustainable Groundwater Management Act (SGMA) and at a local level through the Los Angeles Basin Plan. Enacted in 2014, SGMA evaluated and prioritized California's basins and subbasins for groundwater management requirements based on several criteria including but not limited to groundwater overdraft, water quality, irrigated acres, population, and groundwater reliance. The West Coast Basin was determined to be *"very low"* priority by DWR due to its low levels of criteria pollutants and relatively stable groundwater levels; therefore, the Basin is not subject to a sustainable groundwater management plan under SGMA. The Los Angeles Basin Plan addresses groundwater issues within the Basin as part of the Coastal Plain of Los Angeles Groundwater Basin. In order to meet drinking water standards, the Los Angeles Basin Plan sets forth groundwater quality parameters for four primary constituents of concern in the Basin: 1) TDS; 2) sulfates; 3) chloride; and 4) boron. The groundwater quality objectives assigned to the Basin by the Los Angeles RWQCB are outlined in Table 3.9-12.

**Table 3.9-2. Groundwater Quality Objectives for the West Coast Basin (No. 4-11.03)**

| Pollutant (mg/L) | | | |
|---|---|---|---|
| **TDS** | **Sulfate** | **Chloride** | **Boron** |
| 800 | 250 | 250 | 1.5 |

Notes: TDS = total dissolved solids; mg/L = milligrams per liter.
Source: Los Angeles RWQCB 2019b.

- **TDS** are dissolved solids plus suspended and settleable solids in water consisting of calcium, chlorides, nitrate, phosphorus, iron, sulfur, and other ion particles that will pass through a filter. Higher concentrations of TDS can affect water clarity, diminish

photosynthesis, lead water sources to retain heat, and adversely affect the taste of drinking water. Sources of TDS include industrial discharges, sewage, fertilizers, urban runoff, soil erosion, and saltwater intrusion to the basin.

- **Sulfates** are found almost universally in natural waters at concentrations ranging from a few tenths to several thousand milligrams/liter (mg/L). The highest concentrations are usually found in groundwater and are considered to be a mixture of sulfates from atmospheric, geochemical, and biological sources. Sulfates are discharged into surface water through industrial wastes and atmospheric deposition of sulfur dioxide (USEPA 2003). Consumption of high sulfate concentrations in drinking water can cause cathartic effects or dehydration.
- **Chloride** in drinking water is not harmful but can adversely affect taste in drinking water. Chloride in surface and groundwater originates from both natural and anthropogenic sources, such as run-off containing road de-icing salts, the use of inorganic fertilizers, landfill leachates, septic tank effluents, animal feeds, industrial effluents, irrigation drainage, and seawater intrusion in coastal areas (World Health Organization 2003).
- **Boron** is a naturally occurring element that is present in groundwater primarily as a result of leaching from rocks and soils containing borates and borosilicates but can also enter the environment through man-made processes such as manufacturing High concentrations of Boron can have toxic effects on aquatic life and terrestrial plants. Exposure to high levels of boron can also adversely affect fetal development (World Health Organization 1998).

Flooding and Sea Level Rise

The Project site is not located within the immediate vicinity of any major creeks, rivers, or other watercourses that may pose a threat from riverine flooding. Portions of Redondo Beach, primarily along the coastline, are located within the 100-year flood plain and therefore are at risk for coastal flooding (Federal Emergency Management Agency [FEMA] 2020). However, the Project site is located approximately 1.2 miles inland from the Pacific Ocean and within the FEMA Flood Zone X, which denotes an area where the potential for flooding is minimal (FEMA 2020). Due to its inland location, the Project site is not within a mapped tsunami inundation hazard area and is not at risk for tsunami inundation (California Department of Conservation 2009).

Coastal stormwater and sewer infrastructure within Redondo Beach and Torrance is vulnerable to sea level rise. As groundwater elevations increase due to sea level rise, saltwater intrusion could occur and reduce stormwater capacity, which could lead to localized flooding (County of Los Angeles 2016). However, given that the Project site is located approximately 1.2 miles inland from

the shoreline of the Pacific Ocean and approximately 146 to 166 feet MSL, stormwater and sewer infrastructure serving the Project site are not at risk of damage from projected sea level rise.

Existing Conditions at the Project Site

*Site Drainage*

A site-specific Hydrology and Water Quality Report was prepared for the proposed Project by John Labib & Associates (2021) (see Appendix H) and peer reviewed by Wood Environment & Infrastructure, Inc. (Wood) civil engineers. As described in Section 2.2.2, *Existing Project Site*, the Project site consists of the existing 9.35-acre fully developed BCHD campus and the adjacent 0.43-acre vacant Flagler Lot. The BCHD campus is developed with 1- to 5-story buildings, a subterranean parking garage, a parking structure, and surface parking lots. Landscaped areas are limited to perimeter planters, small lawns areas, and landscaped trees (particularly along the western boundary of the Project site; refer to Section 3.3, *Biological Resources*). The vacant Flagler Lot is unpaved, which allows stormwater to infiltrate into the ground.

The BCHD campus is higher in elevation than the adjacent properties, while the vacant Flagler Lot is similar in elevation to the surrounding features including Beryl Street, Flagler Lane, and the Redondo Village Shopping Center. The BCHD campus is elevated by approximately 25 feet above the shopping center to the north along Beryl Street and by approximately 30 feet above Flagler Lane and Flagler Alley to the east. The topography of the Project site is relatively flat, with gentle slopes varying from approximately 146 to 166 feet MSL and surface gradients to the northeast. The vacant Flagler lot has an approximate 2:1 gradient with surface elevations sloping towards the eastern portion of the site. Runoff from the BCHD campus sheet flows towards the perimeters of the campus where it is conveyed to the exiting municipal stormwater drainage systems, whereas runoff from the vacant Flagler Lot is infiltrated into the unpaved ground or flows towards the east where it discharges to curb drains. The northeast portion of the Project site drains to an existing catch basin and an 18-inch storm drain line that discharges into the City of Torrance municipal storm drain system beneath Flagler Lane (see Figure 3.9-2). The northwest portion of the Project site drains westerly toward North Prospect Avenue and the remaining south and southeast portions of the site drain to the southwest toward North Prospect Avenue. These flows eventually discharge to the curb and gutter in North Prospect Avenue and eventually outlet into the City of Redondo Beach municipal storm drain system (see Figure 3.9-2) (John Labib & Associates 2021).

Approximately 369,633 square feet (sf) or 81.7 percent of the Project site is covered in impervious surface area (John Labib & Associates 2021). The Los Angeles County's HydroCalc Calculator was used to determine the existing peak runoff rates at the Project site during the 10-, 50-, and

100-year storm events (see Appendix H). HydroCalc is a software based on the Modified Rational Method (MODRAT), as outlined by the Los Angeles County Public Works Department (LACDPW) Hydrology Manual (2006).

The LACDPW Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Further, the Los Angeles RWQCB allows the use of 85$^{th}$ percentile 24-hour rainfall event or the 0.75-inch event for Standard Urban Storm Water Mitigation Plan (SUSMP) and BMP design hydrologic studies. The 85$^{th}$ percentile storm is used to represent the approximate amount of rainfall that would occur from 85 percent of storms occurring in the Los Angeles RWQCB region.[2] The 85$^{th}$ percentile 24-hour rainfall depths vary from 0.30 to 1.50 inches within the Los Angeles County (LACDPW 2004). The Hydrology and Water Quality Report prepared for the proposed Project modeled peak flow for stormwater discharge occurring during the 85$^{th}$ percentile storm to represent a likely scenario for rainfall in the region.

The street flow capacity of the storm drain in North Prospect Avenue is approximately 225 cubic feet per second (cfs). The peak flow generated from a 50-year storm event at the Project site is approximately 20 cfs (see Table 3.9-3).

**Table 3.9-3. Existing 85$^{th}$ Percentile 10-, 50- and 100-year Peak Stormwater Discharge at the Project Site**

| | 85$^{th}$ Percentile | 10-Year | 50-Year | 100-Year |
|---|---|---|---|---|
| Clear Peak Flow Rate (cfs) | 1.4 | 12.0 | 20.0 | 24.1 |
| 24-Hour Clear Runoff Volume (cubic feet) | 21,161 | 105,038 | 147,568 | 165,791 |

Notes: The standard for storm water pollutant control is retention of the 24-hour 85$^{th}$ percentile storm volume, defined as the event that has a precipitation total greater than or equal to 85 percent of all daily storm events larger than 0.01 inches over a given period of record in a specific area or location.
Source: John Labib & Associates 2021; see Appendix H.

[2] The standard for storm water pollutant control is retention of the 24-hour 85$^{th}$ percentile storm volume, defined as the event that has a precipitation total greater than or equal to 85 percent of all daily storm events larger than 0.01 inches over a given period of record in a specific area or location.

wood.

**Existing Site Drainage**

**FIGURE 3.9-2**

*Groundwater*

The Project site is located within the West Coast Groundwater Basin of the Los Angeles Coastal Plain and approximately along the West Coast Basin Seawater Intrusion Barrier, both are located approximately 1 mile east of the Redondo Beach King Harbor. Based on the findings of the subsurface soil investigations, groundwater was not encountered at a boring depth of 61.5 feet (refer to Section 3.6, *Geology and Soils*; see Appendix F). Groundwater levels may fluctuate with the seasons, and zones of perched groundwater may be present at various depths due to local conditions or during rainy seasons. Groundwater conditions below any given site vary depending on numerous factors including seasonal rainfall, local irrigation, and groundwater pumping, among other factors not evident at the time of exploration (Converse Consultants 2016).

As described further in Section 3.8, *Hazards and Hazardous Materials*, no collected soil samples contained contaminants above screening levels. Three collected soil vapor samples contained contaminants at levels above their screening levels. These contaminants included tetrachloroethylene (PCE), benzene, and chloroform. Given that the proposed Project is nearly entirely developed with impervious surface and because groundwater was not encountered at a maximum boring depth of 61.5 feet, PCE contamination is not likely to have affected underlying groundwater at or near the Project site.

### 3.9.2 Regulatory Setting

Federal Regulations

*Clean Water Act*

The CWA (33 U.S. Code [USC] §§1251 et seq.) establishes the basic structure for regulating discharges of pollutants into the waters of the U.S. and authorizes Federal (i.e., USEPA), State, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of Sate waters and tributaries. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges, requires States to establish site-specific water quality standards for navigable bodies of water to enhance beneficial uses of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. Under the CWA, States are required to identify the waters within its boundaries that do not meet water quality standards, and establish a TMDL for each of the pollutants impairing the water quality standards in that water body. As previously described, Redondo Beach and Santa Monica Bay are listed as

impaired water bodies on the CWA Section 303(d) List. Key provisions of the CWA address water quality standards and the establishment of the NPDES program for controlling the discharge of stormwater. The NPDES program regulates stormwater discharges from three potential sources: Municipal Separate Storm Sewer System (MS4), construction activities, and industrial activities. To prevent harmful pollutants from being washed or dumped into an MS4, operators must obtain a NPDES permit and develop a stormwater management program. Implementing programs intended to meet TMDLs defined under the NPDES program are managed at the State and regional levels, as discussed below.

*FEMA National Flood Insurance Program*

The National Flood Insurance Program offers flood insurance to homeowners, renters, and business owners if their community participates in the program. Participating communities agree to adopt and enforce ordinances that meet or exceed FEMA requirements to reduce the risk of flooding.

State Regulations

The California Environmental Protection Agency (CalEPA) is charged with developing, implementing, and enforcing the State's environmental protection laws. The SWRCB and nine RWQCBs – including the Los Angeles RWQCB – operate under the regulatory authority of the USEPA. The SWRCB, a branch of CalEPA, and the RWQCBs have the responsibility of granting NPDES permits for certain point source discharges. California issues NPDES permits to selected point source dischargers and issues either waste discharge requirements or conditioned water quality certification for other discharges.

*Porter-Cologne Water Quality Control Act*

The Porter-Cologne Water Quality Act established the SWRCB and divided the State into nine regional basins, each under the jurisdiction of a RWQCB. The SWRCB is the primary State agency responsible for the protection of California's water quality and groundwater supplies. The RWQCBs carry out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a water quality control plan or basin plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems. The Porter-Cologne Act states that a RWQCB may include water discharge prohibitions applicable to particular conditions, areas, or types of waste within its regional plan. California Water Code Section 13170 also authorizes the SWRCB to adopt water quality control plans on its own initiative.

*NPDES Construction General Permit*

The SWRCB regulates stormwater runoff from construction activities under Order No. 2009-009-Division of Water Quality (DWQ), as amended by 2010-0014-DWQ and 2012-0006-DWQ. Construction activities subject to the NPDES Construction General Permit include sites that disturb an area of 1 acre or more, and small construction sites less than 1 acre but part of a larger common plan of 1 acre or more. The Order requires that, prior to beginning any construction activities, the applicant must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent (NOI) and an adequate Stormwater Pollution Prevention Plan (SWPPP). The SWPPP has two major objectives: 1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and 2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges. Required elements of a SWPPP include: 1) site description addressing the elements and characteristics specific to the site; 2) descriptions of BMPs for erosion and sediment controls; 3) BMPs for construction waste handling and disposal; 4) implementation of approved local plans; 5) proposed post-construction controls, including a description of local post-construction erosion and sediment control requirements; and 6) non-stormwater management. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for *"non-visible"* pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the CWA Section 303(d) List for sediment.

All construction activities related to the proposed Project are subject to the requirements in the Construction General Permit. The current permit, as amended, establishes the following:

- **Technology-based Numeric Action Levels (NALs):** The Construction General Permit includes NALs for pH and turbidity. NALs are essentially numeric benchmark values for certain parameters that, if exceeded in effluent sampling, trigger the discharger to take actions. Exceedance of an NAL does not itself constitute a violation of the Construction General Permit; however, if the discharger fails to take the corrective action required by the Construction General Permit, that may constitute a violation.
- **Technology-based Numeric Effluent Limitations (NELs):** The Construction General Permit contains NELs for pH during any construction phase where there is a high risk of pH discharge and turbidity for all discharges.
- **Risk-based Permitting Approach:** The Construction General Permit establishes a four-level risk calculation. Those dischargers that are determined to be Risk Level 4 are not covered by the Construction General Permit, and thereby are required to submit a Report

of Waste Discharge to the appropriate RWQCB and seek coverage under an individual or other applicable general permit.

- **Minimum Requirements Specified:** The Construction General Permit specifies more minimum BMPs and requirements that were previously only required as elements of the SWPPP or were suggested by guidance.
- **Project Site Soil Characteristics Monitoring and Reporting:** The Construction General Permit requires all dischargers to monitor and report soil characteristics. The primary purpose of this requirement is to provide better risk determination and eventually better program evaluation.
- **Effluent Monitoring and Reporting:** The Construction General Permit requires effluent monitoring and reporting for pH and turbidity in stormwater discharges. The purpose of this monitoring is to be used to determine compliance with the NELs and evaluate whether NALs included in this Construction General Permit are exceeded.
- **Receiving Water Monitoring and Reporting:** The Construction General Permit requires some Risk Level 2 and Risk Level 3 dischargers to monitor receiving waters.
- **New Development and Redevelopment Stormwater Performance Standards:** The Construction General Permit specifies runoff reduction requirements for all sites not covered by a Phase I or Phase II MS4 NPDES Permit, to avoid, minimize and/or mitigate post-construction stormwater runoff impacts.
- **Rain Event Action Plan:** The Construction General Permit requires sites to develop and implement a Rain Event Action Plan that must be designed to protect all exposed portions of the site within 48 hours prior to any likely storm event.
- **Site Photograph Self-Monitoring and Reporting:** The Construction General Permit requires all projects to provide photographs of their sites at least once quarterly if there are storm events causing a discharge during that quarter. The purpose of this requirement is to help RWQCB staff prioritize their compliance evaluation measures (e.g., inspections). In addition, this reporting makes compliance-related information more readily available to the public.
- **Annual Reporting:** The Construction General Permit requires all projects that are enrolled for more than one continuous 3-month period to submit information and annually certify that their site complies with these requirements. The primary purpose of this requirement is to provide information needed for overall program evaluation and public information.
- **Certification/Training Requirements for Key Project Personnel:** The Construction General Permit requires that key personnel (e.g., SWPPP preparers, inspectors, etc.) have specific training or certifications to ensure their level of knowledge and skills are adequate

to ensure their ability to design and evaluate project specifications that will comply with all applicable requirements.

*Water Quality Control Plan for Ocean Waters of California (Ocean Plan)*

California Water Code, Division 7, Section 13000 includes water quality objectives for the protection of oceanic water quality. The revised Ocean Plan was adopted by the SWRCB in 2005 and approved by the USEPA in 2006. The Ocean Plan contains water quality objectives for ocean waters of the State to ensure the reasonable protection of beneficial uses and the prevention of nuisance. The Ocean Plan also sets forth effluent limits or levels of water quality characteristics that apply to all discharges to the coastal waters of California. Waste management systems that discharge to the ocean must be designed and operated in a manner to maintain a healthy marine ecosystem and not adversely impact the health of recreational users. Pursuant to California Water Code Section 13263(a), the requirements of the NPDES program implement the Ocean Plan.

*Sustainable Groundwater Management Act*

The SGMA requires to medium- and high-priority basins to develop groundwater sustainability agencies (GSAs), develop groundwater sustainability plans (GSPs) by January 31, 2022, and manage groundwater for long-term sustainability. The West Coast Basin, where the City of Redondo Beach and City of Torrance, are located is designated as a *"very low"* priority basin. Therefore, the West Coast Bain is not subject to the requirements of the SGMA (DWR 2020).

*California Toxics Rule*

The USEPA has established numeric water quality criteria for certain toxic substances for California via the California Toxics Rule (CTR). The CTR establishes acute and chronic surface water quality standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the RWQCBs as having beneficial uses protective of aquatic life (23 priority toxics) or human health (57 priority toxics). Numeric criteria established in the CTR are the same as those recommended by the USEPA in the CWA Section 304(a) guidance. The CTR also includes provisions for compliance schedules to be issued for new or revised NPDES permit limits when certain conditions are met.

*State Antidegradation Policy*

In accordance with Federal Antidegradation Policy, the SWRCB adopted in Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality Waters in California (more commonly referred to as the State Antidegradation Policy), which restricts the degradation of surface waters of the State and protects bodies of water where the existing water quality is higher

than necessary for the protection of present and anticipated designated beneficial uses. The State Antidegradation Policy is implemented by the Los Angeles RWQCB.

*California Water Code Section 13260*

California Water Code Section 13260 requires that any person discharging or proposing to discharge waste that could affect the quality of the waters of the State, in a location other than the community sewer system, must submit a report of the waste discharge with the applicable RWQCB.

Regional Regulations

*Water Quality Control Plan for the Los Angeles Region (Los Angeles Basin Plan)*

The Los Angeles Basin Plan establishes beneficial uses for surface and groundwater in the region and sets forth the regulatory water quality standards set by the Los Angeles RWQCB to protect those designated beneficial uses (Los Angeles RWQCB 2019a). Where multiple designated beneficial uses exist, water quality standards must protect the most sensitive use. In cases where the Los Angeles Basin Plan does not contain a water quality objective for a pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under CWA Section 304(a). Permits issued to control pollution (i.e., water quality standards) while taking into consideration beneficial uses to be protected. The Los Angeles Basin Plan works to preserve and enhance water quality and protect the beneficial uses of Redondo Beach and Santa Monica Bay (e.g., inland surface waters, groundwater, and coastal waters such as bays and estuaries). Runoff from southern Redondo Beach and West Torrance flow westerly where they are collected by the City of Redondo Beach municipal storm drain system and outlet to the Pacific Ocean. The Los Angeles Basin Plan establishes water quality objectives to prevent harmful pollution from entering these waterbodies.

*Construction Dewatering General Permit*

The General Permit for Waste Discharge Requirements for Water from Construction and Project Dewatering to Surface Waters (Order No. R4-2013-0095) became effective in the Los Angeles RWQCB jurisdiction in July 2013. The Dewatering Permit authorizes discharges of treated or untreated groundwater generated from permanent or temporary dewatering operations, or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. Discharges from facilities to Federal waters that could not potentially cause or contribute to a violation of any applicable Federal or State water quality objectives/criteria or cause acute or

chronic toxicity in the receiving water are authorized discharges in accordance with the conditions in the Dewatering Permit. To obtain coverage under this permit, a construction operator must comply with discharge prohibitions and specifications as detailed in the permit language.

*Municipal Separate Storm Sewer System NPDES Permit*

The CWA established the NPDES program to regulate the discharge of pollutants from point sources to waters of the U.S. However, pollution from non-point sources (i.e., urban runoff) was largely unabated. The USEPA developed the NPDES Storm Water Permitting Program in 1990, which established a framework for regulating municipal and industrial discharges of urban runoff. USEPA required NPDES permit coverage for discharges from MS4 with populations of 100,000 or more. Operators of MS4s regulated under the NPDES Storm Water Permitting Program are required to obtain permit coverage for municipal discharges of stormwater and non-stormwater to waters of the U.S.

Under SWRCB enforcement, the Los Angeles RWQCB implements the NPDES Storm Water Permitting Program in Los Angeles County. Except for those discharges originating from the City of Long Beach MS4, stormwater and non-stormwater discharges from the County of Los Angeles MS4 are regulated under NPDES Permit No. CAS004001 (Final Order No. R4-2012-0175), which went into effect in December 2012. The Los Angeles County MS4 NPDES Permit covers 86 permittees, which include the City of Redondo Beach and the City of Torrance. The provisions of this MS4 NPDES Permit are intended to develop, achieve, and implement a timely, comprehensive, cost-effective stormwater pollution control program to reduce the discharge of pollutants in stormwater to the MS4 from the permitted areas in the County of Los Angeles to the waters of the State. Pursuant to CWA, the MS4 NPDES Permit includes effluent limitations and other provisions to implement the TMDLs for the water bodies that have been classified as impaired on the State's CWA Section 303(d) List. The MS4 NPDES Permit prohibits non-stormwater discharges, except for natural flows, uncontaminated groundwater infiltration, and certain exemptions including landscape irrigation, non-commercial car washing, non-emergency fire-fighting activities, and natural dewatering, provided that conditionally exempt non-stormwater discharges avoid potential sources of pollutants in the flow path to prevent the introduction of pollutants to the MS4 and receiving water.

In 2018, the Los Angeles RWQCB approved the removal of fecal coliform from the monitoring requirements contained in Attachment E of the MS4 NPDES Permit for consistency with Resolution No. R10-005, which removed the water quality objective for fecal coliform in freshwater designated for water contact recreation and limited water contact recreation.

The MS4 Permit sets forth the requirements for all permittees, which are discussed further below:

- **Construction.** For all construction sites that disturb less than 1 acre of soil, permittees must require the implementation of an effective combination of erosion and sediment control BMPs to prevent erosion and sediment loss, and the discharge of construction wastes. For all construction sites 1 acre or more that disturb soil, permittees must require the preparation or submission an Erosion and Sediment Control Plan prior to the disturbance of land. The Project site is approximately 9.78 acres, so the proposed Project is subject to erosion and sediment BMPs. The Erosion and Sediment Control Plan must contain appropriate site-specific construction site BMPs for controlling erosion during excavation and grading activities. Erosion and Sediment Control Plans must include the elements of a SWPPP and must address methods to minimize footprint of disturbed area, methods to protect native vegetation and trees, sediment/erosion control, non-stormwater controls (e.g., vehicle washing, soil watering, dewatering, etc.), materials management (e.g., delivery and storage), spill prevention and control, and waste management (e.g., concrete washout/waste management, sanitary waste management, etc.). SWPPPs prepared in accordance with the requirements of the Construction General Permit can be accepted as Erosion and Sediment Control Plans.
- **Operation.** The NPDES MS4 Permit requires that permittees, including the City of Redondo Beach and the City of Torrance, implement operational stormwater runoff controls for new development and redevelopment projects. Under the NPDES MS4 Permit, these projects must be designed to minimize the footprint of the impervious area and to use low-impact development (LID) strategies to disconnect the runoff from impervious area. Projects must be designed to retain on-site stormwater runoff resulting from either the 0.75-inch per 24-hour storm or the 85$^{th}$ percentile storm as defined in the Los Angeles County 85$^{th}$ percentile, 24-hour storm isohyetal map, whichever is greater. Stormwater runoff may be retained on-site by methods designed to intercept rainwater via infiltration, bioretention, and harvest and use. Examples of LID strategies that may be employed to meet the stormwater retention requirements include rain gardens, bioswales, pervious pavement, green roofs, and rainwater harvesting for use in landscape irrigation.
- **Construction Dewatering General Permit.** The Los Angeles RWQCB also regulates discharges of groundwater from construction activities in the coastal watershed of Los Angeles County under Order No. R4-2013-0095 (NPDES Permit No. CAG994004), which was adopted on June 6, 2013. Discharges covered by this permit include, but are not limited to, treated or untreated groundwater generated from permanent or temporary dewatering operations. This permit applies to all construction dewatering activities and includes

effluent and receiving water limitations for metals and other potential contaminants in discharges from dewatering operations, as well as monitoring and reporting requirements. Similar to the Construction General Permit, the construction operator must submit a NOI to discharge groundwater generated from construction dewatering operations in accordance with the requirements of the Construction Dewatering General Permit. The NOI must include such information as the intended reuse or disposal of the wastewater, the nature of wastewater treatment, the discharge point of the wastewater, and the nature of the receiving waters.

*Enhanced Watershed Management Program for the Beach Cities EWMP Area*

EWMPs are WMPs which comprehensively evaluate opportunities for collaboration on multi-benefit regional projects that retain all non-stormwater runoff and runoff from the 85$^{th}$ percentile, 24-hour storm event while also achieving benefits associated with issues such as flood control and water supply. In general, WMPs and EWMPs are intended to facilitate Permit compliance and water quality target achievement.

Following adoption of the 2012 Los Angeles MS4 NPDES Permit, the cities of Hermosa Beach, Manhattan Beach, Redondo Beach, and Torrance, together with the LACFCD, collectively referred to as the Beach Cities Watershed Management Group (WMG), agreed to collaborate on the development of an EWMP for the Santa Monica Bay and Dominguez Channel areas within their jurisdictions (referred to herein as the Beach Cities EWMP Area). The Machado Lane Subwatershed is not included in the Beach Cities EWMP Area. The EWMP summarizes watershed-specific water quality priorities identified by the Beach Cities WMG, outlines the program plan including specific strategies, control measures, and BMPs to achieve water quality targets, and describes the quantitative analyses completed to support target achievement and Permit compliance (Beach Cities WMG 2018).

*Los Angeles County Low Impact Development Standards Manual*

The County prepared the 2014 Low Impact Development Standards Manual (LID Manual) to comply with the requirements of the MS4 permit. The LID Manual is an update and compilation of the following documents:

- Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (September 2002)
- Technical Manual for Stormwater Best Management Practices in the County of Los Angeles (February 2004)
- Stormwater Best Management Practice Design and Maintenance Manual (August 2010)

- Low Impact Development Standards Manual (January 2009)

The LID Manual addresses the following objectives and goals:

- Reduce the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies.
- Minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies.
- Minimize erosion and other hydrologic impacts on all projects located within natural drainage systems that have not been improved by requiring projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies.

The use of LID BMPs in project planning and design is intended to preserve a site's predevelopment hydrology by minimizing the loss of natural hydrologic processes such as infiltration, evapotranspiration, and runoff detention. LID BMPs try to offset these losses by introducing structural and non-structural design components that restore these water quality functions.

*Standard Urban Stormwater Mitigation Plan*

The NPDES MS4 Permit defines the minimum required BMPs that must be adopted by the permittee municipalities and included by developers within plans for facility operations. To obtain coverage under this permit, a developer must obtain approval of a project-specific SUSMP from the appropriate permittee municipality.

A SUSMP addresses the discharge of pollutants within stormwater generated following new construction or redevelopment. Under recent regulations adopted by the Los Angeles RWQCB, projects are required to implement a SUSMP during the operational life of a project to ensure that stormwater quantity and quality is addressed by incorporating BMPs into project design. This plan defines water quality design standards to ensure that stormwater runoff is managed for water quality concerns and to ensure that pollutants carried by stormwater are confined and not delivered to receiving waters. Applicants are required to abide by source control and treatment control BMPs from the list approved by the Los Angeles RWQCB and included in the SUSMP. These measures include infiltration of stormwater as well as filtering runoff before it leaves a site. This can be accomplished through various means, including the use of infiltration pits, flow-through planter boxes, hydrodynamic separators, and catch basin filters.

In combination, these treatment control BMPs must be sufficiently designed and constructed to treat or filter the first 0.75 inches of stormwater runoff from a 24-hour storm event, and post-development peak runoff rates and volumes cannot exceed peak runoff rates and volumes of pre–development conditions. Permittees are required to adopt the requirements set forth herein in their own SUSMP. Additional BMPs may be required by ordinance or code adopted by the permittee and applied in a general way to all projects or on a case-by-case basis.

*Los Angeles County Department of Public Works Hydrology Manual*

The LACDPW Hydrology Manual establishes county hydrologic design procedures and serves as a reference and training guide. The manual outlines county standards to be used when converting rainfall to runoff flow rates and volumes based on collected historic rainfall and runoff data specific to the County of Los Angeles. The standards set forth in this manual govern all hydrology calculations done under LACDPW jurisdiction. The hydrologic techniques in this manual apply to the design of local storm drains, retention and detention basins, pump stations, and major channel projects. The techniques also apply to storm drain deficiency and flood hazard evaluations.

City of Redondo Beach Local Policies and Regulations

*City of Redondo Beach General Plan Utilities Element*

The Redondo Beach General Plan Utilities Element contains goals and policies related to hydrology and surface and groundwater quality that apply to the proposed Project. These policies include, but are not limited to:

Policy 6.2.12 Where appropriate and feasible, upgrade the existing drainage system by replacing open swales and drainage channels with covered or underground facilities.

Policy 6.7.3 The City of Redondo Beach Community Development Department and City of Redondo Beach Public Works Department shall, through the local design and environmental review and approval process, ensure that new development proposed in the area of the existing groundwater (seawater) intrusion barrier and water injection well system will not create any adverse impacts or damage to the operation of the system.

*Redondo Beach Municipal Code*

Redondo Beach Municipal Code (RBMC) Title 5 Chapter 7 contains the City's Stormwater Management and Discharge Control Ordinance. This Chapter seeks to ensure health and safety of citizens and the water quality of receiving waters of the County of Los Angeles and surrounding coastal areas by:

- Reducing pollutants in stormwater discharges to the maximum extent practicable.
- Regulating illicit connections and illicit discharges and thereby reducing the level of contamination of stormwater and urban runoff into the MS4.
- Regulating non-stormwater discharges to the MS4.
- Protecting and enhancing the quality of watercourses, water bodies, and wetlands in the city in a manner consistent with the federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the Los Angeles County MS4 NPDES Permit.

RBMC Chapter 5-7 prohibits illicit discharges and connections to the municipal stormwater system, littering, and any discharges in violation of the County of Los Angeles MS4 NPDES Permit. RBMC Section 5-7.113 contains the SUSMP Requirement for New Development and Redevelopment Projects, which regulates urban runoff in Redondo Beach and requires owners and occupants within the City to implement BMPs to prevent or reduce the discharge of pollutants to the municipal stormwater system. RBMC Section 5-7.113 also requires integration of LID practices and standards through means of infiltration, evapotranspiration (i.e., the combined process of water surface evaporation, soil moisture evaporation, and plant transpiration), biofiltration, and rainfall harvest and use be included in the SUSMP. LID BMPs focus on reducing peak runoff by allowing rainwater to soak into the ground, evaporate into the air, or collect in storage receptacles for irrigation or other beneficial uses (City of Redondo Beach 2015). Examples of infiltration BMPs include infiltration basins, dry wells, and pervious pavement.

City of ~~Redondo Beach~~Torrance Local Policies and Regulations

*Torrance General Plan Circulation and Infrastructure Element*

The Torrance General Plan Circulation and Infrastructure Element contains goals and policies related to circulation and infrastructure, including policies on storm drain systems that apply to the proposed Project. These policies include, but are not limited to:

Policy CI.9.4 Require that new development assume the full fair-share costs of construction and expansion of water, sewer, and storm drain system improvements necessitated by that development.

Policy CI.9.9 Require that developers address the City's Total Maximum Daily Load as required by a project's watershed.

*Torrance General Plan Community Resources Element*

The Torrance General Plan Community Resources Element includes water conservation goals and policies related to hydrology and surface and groundwater quality that apply to the proposed Project. These policies include, but are not limited to:

Policy CR.15.3 Maximize the use of local water resources to reduce imported water supplies. Policy CR.15.4: Encourage residents and businesses in Torrance to practice water conservation through incentive programs and where necessary, programs that penalize wasteful practices.

Policy CR.15.5 Enforce regulations aimed at reducing groundwater and urban runoff pollution, including the NPDES requirements of the Regional Water Quality Control Board.

Policy CR.15.6 Reduce the amount of water used for landscaping through such practices as the planting of native and drought-tolerant plants, use of efficient irrigation systems, and collection and recycling of -4runoff.

Policy CR.15.7 Implement the water conservation projects set forth in the City's Urban Water Management Plan.

Policy CR.15.8 Expand the use of recycled water at schools, parks, at City facilities, and other potential irrigation or industrial use sites.

Policy CR.15.9 Identify opportunities for increased use of reclaimed water.

Policy CR.15.10 Promote implementation of effective water conservation and water demand management measures including Best Management Practices.

*Torrance Municipal Code*

The City of Torrance is one of the co-permittees on the MS4 Permit (Order No. R4-2012-0175). Stormwater quality provisions of the municipal code are set forth in Division 4 Chapter 10, Stormwater and Urban Runoff Pollution Control, and Chapter 11, LID Strategies for Development

and Redevelopment. These municipal code requirements ensure compliance with NDPES and MS4 (City of Torrance 2016a, 2016b).

### 3.9.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 California Environmental Quality Act (CEQA) Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on hydrology and water quality if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:
    i. Result in substantial erosion or siltation on- or off-site.
    ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
    iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    iv. Impede or redirect flows.
d) The project would be located in a flood hazard, tsunami, or seiche zones, and risk release of pollutants due to project inundation.
e) The project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

*Non-Applicable Threshold(s):*

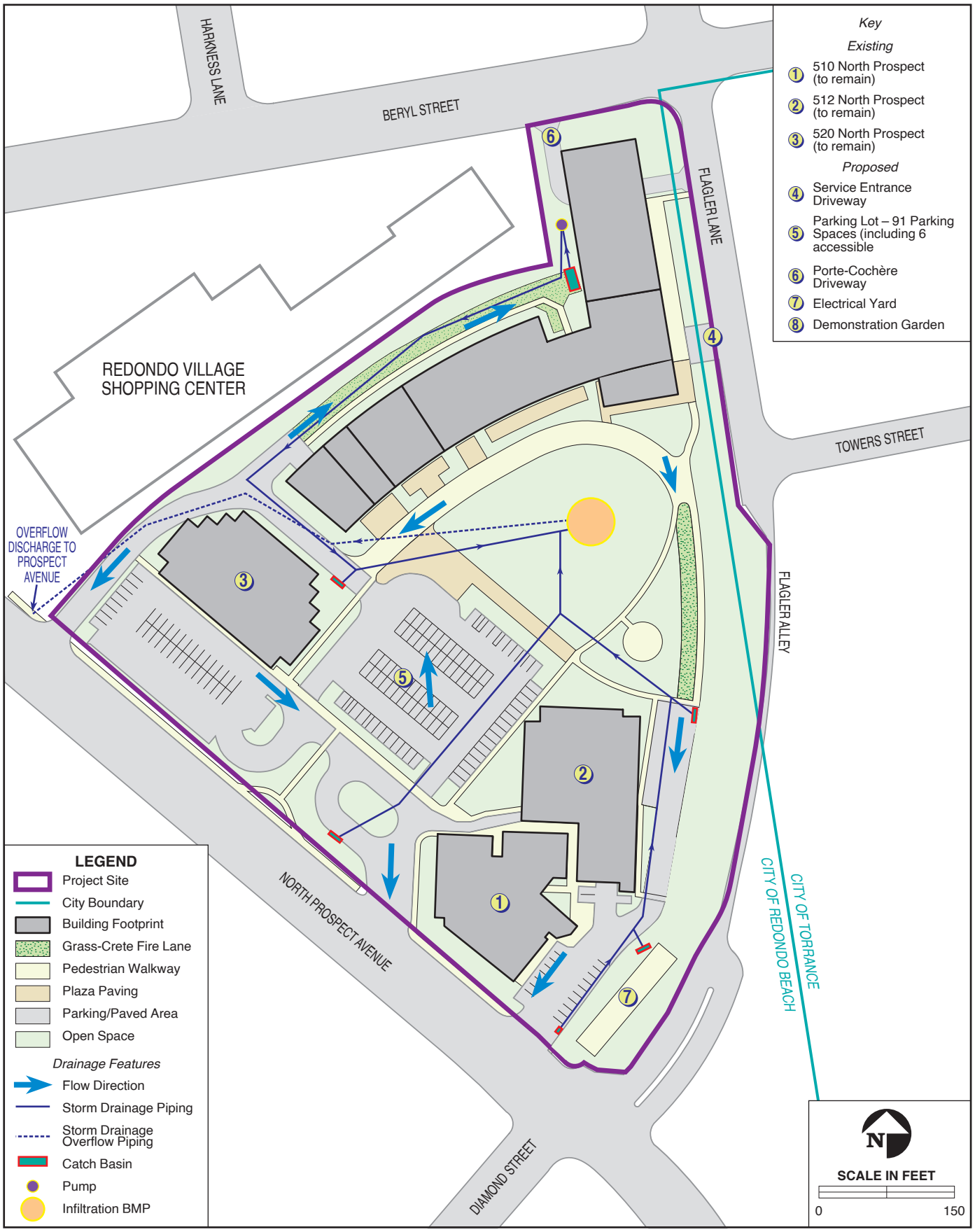
- Threshold (d) (*Flood Hazard, Tsunami, or Seiche Zones*): As described in the Initial Study (IS) (see Appendix A) prepared for the proposed Project, the Project site is located outside of 100-year and 500-year flood zones. According to the FEMA maps, the Project site is in at area within a minimal flood hazard area (FEMA 2020). The proposed Project would similarly not place any other structures within a 100-year flood hazard area that would

impede or redirect flood flows. Additionally, there are no dams, levees, streams, or rivers, in proximity of the Project site. Therefore, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam and no impact would occur. The Project site is located over 1 mile inland of the Pacific Ocean and is located within a mapped Tsunami Inundation Area (California Department of Conservation 2009). Therefore, the proposed Project would not be affected by or release of pollutants as a result of inundation. Therefore, for the reasons stated above and as discussed in Section X, *Hydrology and Water Quality* of the IS, this issue is not further analyzed in the EIR.

Methodology

The proposed Project was evaluated for hydrologic risks, including potential impacts to surface and groundwater quality, flooding, or groundwater basin capacity based on information from the 2015 Urban Water Management Plan (UWMP), Redondo Beach General Plan Utilities Element, the Torrance General Plan Circulation and Infrastructure Element and Community Resources Element, and the RMBC and TMC. Project-specific information was provided by the Hydrology and Water Quality Report (John Labib & Associates 2021) and geotechnical study prepared for the proposed Project (Converse Consultants 2016).

Potential impacts to the storm drain system were analyzed by comparing the calculated existing and proposed peak runoff rates, taking into consideration the capacity of the existing storm drain system serving the Project site and mandatory compliance with applicable State and local regulations addressing stormwater runoff. Components of the proposed Project that would have the benefit of reducing stormwater runoff and conserving water on-site using LID and outdoor water conservation techniques have been considered. The analysis also takes into consideration mandatory compliance with applicable State and local regulations addressing stormwater runoff and water quality.




wood.

**Phase 1 Site Drainage**

**FIGURE 3.9-3**

### 3.9.4 Project Impacts and Mitigation Measures

Impact Description (HYD-1)

*a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.*

**HYD-1 Neither construction nor operation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in a violation of water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. The proposed Project would comply with existing regulations and plans to ensure the potential impacts to water quality would be *less than significant*.**

*Construction*

Construction of the proposed Project would involve major earthwork, including demolition of existing pavements and structures, excavation and shoring for subterranean levels, grading, and trenching for utilities, which would disturb the underlying soils and expose them to potential erosion and mobilization from wind, rain, and on-site watering activities, necessary to reduce airborne dust (refer to Section 3.6, *Geology and Soils*). These activities could result in sediment transport into adjacent storm drain inlets – particularly during storm events or during on-site watering. Additionally, construction activities have the potential to contribute to polluted stormwater runoff due to the delivery, handling, and storage of construction materials and wastes, as well as potential leakage and spills of construction materials (e.g., oil, grease, paints, solvents, or cleaning agents) (refer to Section 3.8, *Hazards and Hazardous Materials*). During storm events, these contaminants on the Project site have the potential to be washed away by stormwater runoff and carried into the existing storm drain system.

Construction of the proposed subterranean service area and loading dock during Phase 1 would involve the excavation and export of approximately 20,000 cubic yards (cy) of soil (refer to Section 2.5.1, *Phase 1 Preliminary Site Development Plan*). Phase 2 of construction would involve the excavation and export of an estimated 11,000 cy of soil associated with construction of the above ground parking structure (refer to Section 2.5.2, *Phase 2 Development Program*). Winter storms and rainfall events that occur during these construction periods – which would span multiple winter seasons – would generate runoff that could flow of over exposed soil areas and carry suspended sediments and other pollutants into the stormwater drainage system leading to the Pacific Ocean. Due to the substantial amount of proposed excavation and the potential for extended periods of

exposed soils, soil erosion could result in the creation of on-site rills and gullies, clogs in the existing drainage system, and transport of suspended sediments into down-gradient areas of the Project site. This stormwater runoff could also contain eroded construction and demolition debris and associated hazardous materials that would potentially further degrade surface water quality in the vicinity of the Project site, including the Santa Monica Bay. Potential pollutant sources resulting from conditions or areas at the Project site that could cause sediment, silt, and/or turbidity in site runoff include, but are not limited to:

- Exposed soil areas with inadequate erosion control measures;
- Areas of active grading;
- Poorly stabilized slopes;
- Lack of perimeter sediment controls;
- Areas of concentrated flow on unprotected soils;
- Poorly maintained erosion and sediment control measures;
- Tracking sediment onto roads and paved surfaces;
- Unprotected soil stockpiles; and
- Failure of an erosion or sediment control measure.

Potential adverse effects on water quality associated with construction activities would be reduced through compliance with the requirements of the Construction General Permit (SWRCB Order No. 2009-0006-Data Quality Assessment). Prior to beginning any demolition, grading, or construction activities, BCHD must obtain coverage under the General Construction Permit by preparing and submitting a NOI and SWPPP for review and approval by the Los Angeles RWQCB. In accordance with the Stormwater Management and Discharge Control Ordinance, the BMPs developed for the proposed Project would also be incorporated into a SUSMP to be approved by the Redondo Beach DPW Engineering Services Division and Torrance Public Works prior to the initiation of construction-related activities. The SUSMP would require that BMPs minimize pollutants and reduce stormwater runoff to levels that comply with applicable water quality standards. The following urban runoff reduction requirements are required to be implemented during construction, consistent with the Los Angeles County MS4 NPDES Permit:

- **Erosion Control or Soil Stabilization BMPs** cover and/or bind soil particles to prevent them from detaching and becoming transported in stormwater runoff, including hydraulic mulch, geotextiles and mats, dikes, and drainage swales to direct runoff and avoid sheet flow, velocity dissipation devices at outlets, slope drains, soil preparation/roughening to break up sheet flow, and non-vegetative stabilization (e.g., decomposed granite, gravel mulch, etc.). For example, plastic covering would be utilized to prevent erosion of an

otherwise unprotected area (e.g., exposed or open to elements stockpiles). These erosion control measures would be implemented throughout the Project site and would be installed well in advance of any storm events.

- **Sediment Control BMPs** are structural measures that would intercept and filter out soil particles that have been detached and transported by water to reduce sediment discharges from construction areas, including silt fencing, sediment traps, check dams, fiber rolls, gravel bag berms, and sandbag barriers. These structural controls would be placed along the perimeter of the Project site along downhill boundaries where runoff is discharged, below the toe or down slope of erodible slopes, at storm drain inlets, along exposed slopes or temporary stockpiles, at culvert/pipe outlets, in channels/ditches/swales, parallel to roadways, or along mildly sloping construction roads. Another sediment control BMP that would be implemented to prevent sediment from entering storm drains and receiving waters would be street sweeping/vacuuming, particularly at points of egress prior to a precipitation event. In addition, vehicle tracking BMPs such as a rock pad, shaker rack, wheel washer, or other BMPs designed to remove soil and mud from vehicles and further reduce offsite tracking of sediment.
- **Wind Erosion Control BMPs** would prevent the transport of soil from disturbed areas of the Project site, off-site by wind and dry conditions during construction. Dust control measures would include construction watering to stabilize soil from wind erosion associated with construction vehicle traffic on unpaved roads, drilling and blasting activities, soil and debris storage, batch drops from front-end loaders, unstabilized soil, and grading. In addition, wind screen fencing would be installed along the perimeter of the Project site.
- **Non-Stormwater and Materials Management BMPs** would reduce or eliminate non-stormwater discharges from the Project site, including implementation of water conservation practices, compliance with applicable Los Angeles RWQCB and local agency dewatering permits (Order No. R4-2013-0095) for any accumulated precipitation allowed to enter the storm drain system, proper inspection and notification of any illicit connections and discharges off-site. These would also include implementation of proper operation, storage, training, and disposal techniques associated with paving and grinding, vehicle maintenance, concrete, irrigation, and waste management operations. For example, machinery or equipment that is to be repaired or maintained in areas susceptible to or exposed to stormwater, would be placed in a manner so that leaks, spills, and other maintenance-related pollutants are not discharged to the municipal storm drain system. Any trash, debris, free standing oil/grease, spills/leaks, shall be removed prior to sidewalk or street washing. No wash water from any type of equipment, vehicle, or machinery shall

be allowed to leave the Project site. Any washing of equipment in the right-of-way shall be contained and properly disposed of. Additionally, parking lots located in areas potentially exposed to stormwater would be swept regularly or other equally effective measures would be utilized to remove debris from such parking lots.

Implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of the proposed Project. Therefore, construction-related impacts to water quality would be *less than significant.*

*Operation*

The proposed Project would redevelop the existing BCHD campus and adjacent vacant Flagler Lot. The proposed land cover and impervious surface types would be relatively similar to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). However, the proposed Project would redevelop the BCHD campus with greater active green space, landscaping, and grass-crete, which is a semi-permeable surface (refer to Figure 2-10). As a result, Phase 1 of the proposed Project, including construction of the proposed Residential Care for the Elderly (RCFE) Building, the demolition of the existing Beach Cities Health Center and the attached maintenance building, and the development of open space and a landscaped surface parking lot, would create a net reduction in the total amount impervious surface area from 81.7 percent to 57 percent during Phase 1 (see Table 3.9-4; John Labib & Associates 2021; see Appendix H).

**Table 3.9-4. Areas of Pervious and Impervious Surfaces on Project Site Following the Implementation of Phase 1**

| | Total Area (sf) | Pervious Area (sf) | Impervious Area (sf) | Impervious Area (%) |
|---|---|---|---|---|
| Existing | 452,174 | 82,541 | 369,633 | 81.7 |
| Total after Phase 1 | 452,174 | 194,426 | 257,748 | 57.0 |

Note: Calculations are provided in Appendix B of the Hydrology and Water Quality Report (see Appendix H).
Source: John Labib & Associates 2021; see Appendix H.

The Phase 2 development program would increase the area of impervious surfaces due to the development of additional building footprints. For example, under the Example A site plan scenario, the total impervious surface area would be increased from approximately 57 under Phase 1 to 65 percent under Phase 2 (John Labib & Associates 2021; see Appendix H).

The overall net reduction in impervious surface areas associated with the proposed Project compared to existing conditions would reduce the potential for pollutants (e.g., leaking oil, gas,

grease, metals, organics, pesticides, and non-chemical pollutants such as trash, debris, and bacteria) to be discharged during storm events. Pervious surface areas would increase slightly with the addition of open space and landscaping that would retain stormwater on the Project site for longer periods (e.g., the central lawn, ornamental landscaping on the ground-level open space, landscaped planters on the podium deck of the proposed RCFE Building, the Demonstration Garden, etc.). Additionally, as further described in Impact HYD-3, Phase 1 of the proposed Project would involve the construction of an infiltration 85$^{th}$ system designed to retain, treat, and infiltrate the 85$^{th}$ percentile storm, which can be expected to result in 0.30 to 1.50 inches of rainfall in a 24-hour period, into the groundwater. (Again, the 85$^{th}$ percentile storm is used to represent the approximate amount of rainfall that would occur from 85 percent of storms occurring in the Los Angeles RWQCB region.) Any flows larger than the 85$^{th}$ percentile design storm would be conveyed to North Prospect Avenue and the existing storm drain infrastructure discharging to the storm drain line beneath Flagler Lane would be abandoned in place.

The proposed Project would be subject to Federal, State, and local regulations pertaining to operational water quality. For instance, the proposed Project is subject to the Redondo Beach Stormwater Management and Discharge Control Ordinance (City of Redondo Beach 2015). Therefore, BCHD would be required to prepare and implement a SUSMP through the operational life of the proposed Project. Long-term operational requirements in the SUSMP would include one or more of the following to mitigate stormwater runoff:

- Control pollutants, pollutant loads, and runoff volume emanating from the Project site by minimizing the impervious surface area and controlling runoff from impervious surfaces through infiltration, bioretention and/or rainfall harvest and use. The proposed Project would retain the Stormwater Quality Design Volume on-site, defined as the runoff from the 0.75-inch, 24-hour rain event or the 85$^{th}$ percentile, 24-hour rain event, as determined from the Los Angeles County 85$^{th}$ percentile precipitation isohyetal map, whichever is greater.
- Bioretention and biofiltration systems shall meet the design specifications provided in Attachment H of the MS4 NPDES Permit unless otherwise approved by the Los Angeles RWQCB Executive Officer.
- When evaluating the potential for on-site retention, the maximum potential for evapotranspiration from green roofs and rainfall harvest and use shall be considered.

Prior to issuing approval for final occupancy, BCHD would be required to provide an operation and maintenance plan, monitoring plan, where required by the Los Angeles Basin Plan, and verification of ongoing maintenance provisions for LID practices, Treatment Control BMPs, and

Hydromodification Control BMPs including but not limited to: final map conditions, legal agreements, covenants, conditions or restrictions, and/or other legally binding maintenance agreements. Verification at a minimum shall include a BCHD-signed statement accepting responsibility for maintenance until the responsibility is legally transferred.

Therefore, following completion of the proposed Project, stormwater runoff from the Project site would not directly affect water quality in the Santa Monica Bay or local groundwater. Compliance with all applicable State and local regulations would ensure that operational impacts to water quality would be *less than significant.*

Impact Description (HYD-2)

*b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.*

**HYD-2 Construction and operation of the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would not require dewatering activities or otherwise substantially deplete groundwater supplies. The proposed Project would increase groundwater recharge by increasing pervious surface area and improving the existing infiltration system; therefore, there would be a minor *beneficial* impact.**

*Construction*

Based on the findings of the subsurface soil investigation conducted at the Project site, the depth to groundwater at the Project site is more than 61.5 feet below ground surface (bgs) (refer to Section 3.6, *Geology and Soils*; see Appendix F). The proposed Project would include excavation to a maximum depth of 26 feet bgs for the subterranean service area and loading dock of the proposed RCFE Building during Phase 1. Additional excavation also would be required the subterranean levels of the proposed parking structure and the service areas associated with the development under Phase 2. However, dewatering activities would not be necessary, as the maximum excavation depth will not reach groundwater level. Therefore, Construction Dewatering General Permit would not be required.

Due to the existing paved nature of the Project site and lack of stormwater infiltration infrastructure, surface water is not able to naturally infiltrate through the soils and existing groundwater recharge is negligible. Construction activities would temporarily increase the area of

exposed soils; however, the overall change to soil permeability and recharge of the Basin would be nominal.

Construction activities would not substantially deplete groundwater supplies or affect groundwater recharge; therefore, construction impacts to groundwater levels would be *less than significant.*

*Operation*

The proposed Project would improve groundwater recharge by reducing the volume of runoff and improving infiltration at the Project site. The proposed redevelopment of the BCHD campus would decrease the existing impervious area by adding additional landscape areas, permeable paving pathways, and removing the existing large footprint of impervious surface parking lots. Currently, approximately 369,633 sf, or 81.7 percent, of the Project site is covered in impervious surface area (John Labib & Associates 2021). As described in Impact HYD-1, the implementation of the proposed Project would substantially reduce the area of impervious surface compared to existing conditions (John Labib & Associates 2021). The proposed Project would also create a new drainage system capable including the construction of an infiltration system (i.e., drywell or infiltration trench) capable of retaining, treating, and infiltrating the 85$^{th}$ percentile stormwater flows on-site. Consequently, implementation of the proposed Project would improve groundwater recharge at the Project site and there would be a minor *beneficial* impact to groundwater as a result of the proposed Project.

<u>Impact Description (HYD-3)</u>

c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:*
    i. *Result in substantial erosion or siltation on- or off-site.*
    ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
    iii. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
    iv. *Impede or redirect flows.*

**HYD-3** **The proposed Project would involve the construction of an on-site infiltration system to facilitate groundwater recharge and eliminate stormwater drainage to the City of Torrance municipal storm drain system by abandoning the existing infrastructure that discharges to Flagler Lane in place. Additionally,**

**the proposed Project – including the Phase 1 preliminary development plan and the more general Phase 2 development program – would not contribute additional runoff to the City of Redondo Beach municipal storm drain system that would exceed existing capacity or increase sources of polluted runoff. The proposed Project would comply with existing regulations and plans to ensure the potential impacts related to drainage would be *less than significant*.**

*Construction*

Construction of the proposed Project would involve site preparation activities, including demolition, excavation, grading, and trenching within areas that are currently developed with impervious surfaces. Generally, all construction activities – particularly those involving substantial soil excavation – would result in exposure of soils and would cause minor alterations to on-site drainage, including the potential for temporary ponding during storm events (refer to Impact HYD-1). However, all stormwater generated during construction would continue to be directed to the existing storm drain system. As discussed in Impact HYD-1, all elements of the proposed Project would be required to implement BMPs to address soil erosion, including topsoil mobilization and loss, and urban runoff, such that substantial erosion or siltation would not occur. Construction activities would alter drainage on-site during each phase of construction, subject to requirements to control water quality and stormwater flows, but would not alter drainage patterns off-site to the existing storm drain system; therefore, construction activities associated with the proposed Project would result in a *less than significant* impact.

Excavation and grading during construction activities would disturb and loosen soils, increasing the potential for soil erosion from wind and rain. For example, substantial ground disturbance under the proposed Project would include the removal of trees and shrubs (e.g., along the eastern perimeter of the campus), installation of the building foundations and footings, deep excavation of soils for subterranean development, and installation of new landscaping. Installation of new utility connections (e.g., water, sewer, and storm drain lines) would also disturb soil up to a depth of approximately 3 feet bgs (see Section 3.15, *Utilities and Service Systems*). Ground disturbance resulting from construction of the subterranean service area and loading dock during Phase 1 and the subterranean levels of the parking structure and service areas during Phase 2 would extend up to approximately 26 feet deep. Implementation of the proposed Project components would result in exposure of large areas of soils during earth work.

However, as described in Impact HYD-1, during construction a SWPPP, SUSMP, and associated BMPs would be implemented in accordance with applicable Los Angeles RWQCB, City of Redondo Beach, and City of Torrance regulations to provide for temporary stormwater

management and prevent construction activities from adversely affecting the amount or direction of flow of surface water. The SWPPP defines site-design, source-control, and treatment-control BMPs would address the potential polluted runoff and surface water quality impacts would be *less than significant*.

*Operation*

Implementation of the proposed Project would result in impervious surfaces that are relatively similar in type to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). However, as described under Impact HYD-1, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in a net reduction in the total amount impervious surface area in comparison to existing conditions (John Labib & Associates 2021).

John Labib & Associates used the Los Angeles County HydroCalc Calculator to determine the existing proposed peak runoff rates at the Project site during the 10-, 50-, and 100-year storm events (see Appendix H). A summary of existing and post-construction peak flows at the Project site is provided in Table 3.9-5.

**Table 3.9-5. Peak Flow Rates on Project Site Following the Implementation of Phase 1**

| Clear Peak Flow Rates (cfs) | | | | | |
|---|---|---|---|---|---|
| | 85th Percentile | 10-year | 50-year | 100-year | 100-year (% Increase) |
| Existing | 1.4 | 12.0 | 20.0 | 24.1 | - |
| Phase 1 | 0.9 | 8.8 | 16.3 | 20.0 | -17.0% |

Note: Calculations are provided in Appendix B of the Hydrology and Water Quality Report (see Appendix H).
Source: John Labib & Associates 2021; see Appendix H.

The Phase 2 development program would increase the area of impervious surfaces due to the development of additional building footprints. Therefore, the peak flow rates would increase slightly, but still remain less than those described for existing conditions. For example, under the Example A site plan scenario, the total reduction in the 100-year flow would be -13.5 percent as compared to the total reduction of 17.0 percent under Phase 1 (John Labib & Associates 2021; see Appendix H).

Under the proposed Project the existing catch basin and 18-inch storm drain line that outlets to the City of Torrance municipal storm drain system would be abandoned in place. The proposed Project would involve the construction of a new storm drain system on-site including the construction of an infiltration system (i.e., drywell or infiltration trench) capable of retaining, treating, and infiltrating the 85th percentile storm water flows on-site. The percolation tests performed in 2016

by Converse Consultants showed in-situ infiltration rates in the range of 3 to 4 inches per hour which exceeds LACDPW's minimum infiltration rate of 0.3 inches/hour (John Labib & Associates 2021; see Appendix H). Any flows larger than the design storm would be conveyed to North Prospect Avenue, where they would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. However, the peak flow rate and total volume of discharge to the City of Redondo Beach municipal storm drain system would be much less than existing conditions. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of the proposed Project (John Labib & Associates 2021; see Appendix H). Therefore, the proposed Project would result in a reduction in runoff from the site compared to existing conditions, and therefore would have a *less than significant* impact on drainage capacity in the vicinity of the Project site.

Impact Description (HYD-4)

*d) The project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

**HYD-4 The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan – including the Ocean Plan, Los Angeles Basin Plan, Groundwater Basin Master Plan (GBMP), and the California Water Service Company (Cal Water) Urban Water Management Plan (UWMP). Therefore, impacts would be *less than significant.***

As previously described, two water quality control plans are applicable to the Santa Monica Bay WMA, which encompasses the Project site: the Ocean Plan and the Los Angeles Basin Plan. For coastal sites, the Ocean Plan includes water quality objectives for the protection of oceanic water quality. Under the Los Angeles Basin Plan, urban runoff must meet guidelines set by the Los Angeles RWQCB to retain the beneficial use of the receiving water bodies. The Los Angeles Basin Plan works to preserve and enhance water quality and protect the beneficial uses of Santa Monica Bay and Redondo Beach (e.g., preservation of biological habitats, navigation, and migration of aquatic organisms). As described in Impact HYD-1, the proposed Project would be required to comply with the requirements of the Construction General Permit (SWRCB Order No. 2009-0006-Data Quality Assessment) to protect associated inland and coastal water quality. The proposed Project would also implement BMPs, such as sediment and erosion controls, to prevent polluted discharge or runoff that would adversely affect water quality. Therefore, through compliance with

the NPDES program, the proposed Project would be consistent with these applicable water quality control plans and impacts would be *less than significant.*

The proposed Project would not conflict with or obstruct the implementation of sustainable groundwater management plan. As described in Section 3.15, *Utilities and Service Systems*, the Groundwater Basin Master Plan (GBMP) provides guidance for parties operating in the West Coast and Central groundwater basins to support additional recharge and pumping from these basins in order to utilize the basins fully and reduce dependence on imported water. The proposed Project would support objectives of the GBMP by increasing the area of pervious surfaces and facilitating groundwater recharge through infiltration on the Project site.

Additionally, as described further in Section 3.15, *Utilities and Service Systems*, Cal Water's UWMP outlines Hermosa-Redondo District's historical and projected water demands, water supplies, supply reliability and vulnerabilities, water shortage contingency planning, and demand management programs to meet the service area's demands (Cal Water 2016). As discussed in Impact UT-2, implementation of the proposed Project would not increase water demand to a level beyond what can be adequately met by existing and future water supplies as determined by existing plans. The proposed Project would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Los Angeles Basin Plan, Groundwater Master Plan, and 2015 UWMP). Therefore, the impact of the proposed Project on sustainable groundwater management would be *less than significant*.

Cumulative Impacts

Cumulative development within the vicinity of the Project site would have the potential to contribute to increased pollutant loading in urban runoff and changes in localized drainage patterns. Many pending and future projects in Redondo Beach and Torrance involve redevelopment of existing paved areas, which would not result in a substantial change in surface runoff or groundwater infiltration in the cities because existing development is characterized mostly by paved, impervious surfaces. potential impacts related to stormwater runoff would be regulated across the cities in the same manner as they would be for the proposed Project. New development and redevelopment projects within the cities would be required to comply with the Los Angeles County NPDES permit discharge requirements and respective municipal codes to prevent and mitigate potential impacts to water quality from polluted stormwater runoff. Additionally, each approved project in the vicinity of the Project site would be required to implement BMPs to capture stormwater runoff on-site to the maximum extent feasible and reduce pollutants that are discharged to any stormwater runoff that flows off-site, consistent with the local

regulations in effect in each city. Compliance with existing Federal, State, and local regulations would prevent violation of water quality standards and minimize increases in urban runoff and the potential for contributing additional sources of polluted runoff. Additionally, new development and redevelopment projects in the cities that incorporate current BMP requirements could result in improved water quality as compared to existing conditions. Therefore, the proposed Project *would not substantially contribute to cumulatively considerable impacts* on surface water hydrology and surface water quality.

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## 3.10 LAND USE AND PLANNING

This section of the Environmental Impact Report (EIR) provides information on the existing land use and zoning in Redondo Beach and Torrance, and addresses the potential for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project). The analysis provided herein evaluates the potential for the proposed Project to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The analysis for this category of impact addresses applicable land use plans adopted at the State and regional levels, as well as applicable land use planning goals, policies, and regulations including those identified in the Redondo Beach and Torrance General Plans, municipal codes, and zoning ordinances.

### 3.10.1 Environmental Setting

Regional Setting

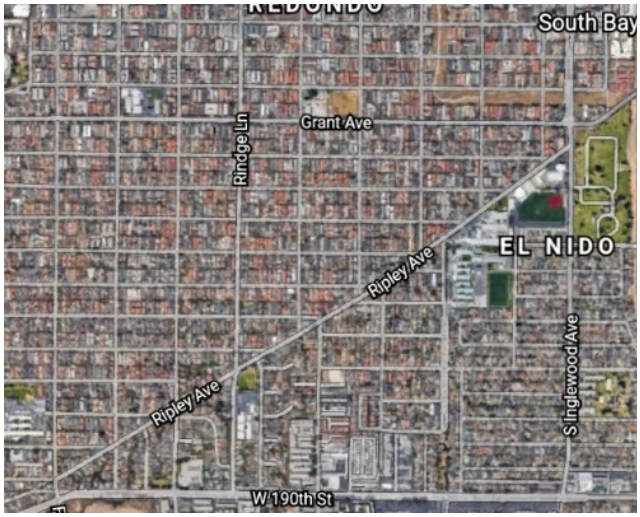
Redondo Beach and Torrance are urbanized beach communities located within Los Angeles County (refer to Figure 2-1). Redondo Beach is bordered to the west by Manhattan Beach and Hermosa Beach and the Pacific Ocean. Torrance borders Redondo Beach to the east and south.

*The campus is a regional community facility located in Los Angeles County that serves Redondo Beach, Hermosa Beach, and Manhattan Beach (collectively referred to as the Beach Cities) as well as other nearby cities such as Torrance.*

Major highways in the area include Interstate (I-) 405, which runs through the northeast corners of Redondo Beach and Torrance; the Pacific Coast Highway (State Route [SR-] 1), which runs north-south through the length of Redondo Beach and through the southern border of Torrance; Hawthorne Boulevard (SR-107), which runs north-south through the length of Torrance; and SR-213, another north-south highway, which runs along the western border of Torrance.

*Redondo Beach*

Redondo Beach occupies approximately 6.4 square miles, extending approximately 5.25 miles in length from north-to-south and 2.2 miles wide east-to-west at its widest points. Redondo Beach is largely organized around a grid system of streets running north-south and east-west with a few diagonal or curved streets, usually in neighborhoods with uneven topography. Prospect Avenue, West 190th Street, Inglewood Avenue, and portions Hawthorne Boulevard generally define the boundaries between the cities. A portion of the Pacific Coast Highway partially defines the southern boundary of the Redondo Beach. Marine Avenue and Herondo Street generally define the northern boundary of Redondo Beach and Aviation Boulevard, Harper Avenue, and the coastline generally define the western boundary.




*Many neighborhoods in Redondo Beach are organized around a grid system which utilize direct north-to-south and east-to-west roadways, with occasional diagonal or curved streets.*

Redondo Beach is a predominantly low density, single-family residential community. Most multiple-family residential areas were originally developed with single-family homes and have transitioned to two or three condominium units on a lot to encourage revitalization and to meet a diversity of housing needs. High-density residential areas within Redondo Beach occur along certain portions of the Pacific Coast Highway. These areas were previously zoned commercial, but were determined to have the potential for higher density residential development.

Commercial districts in the City often occur along commercial corridors with heavily trafficked roads, or in large clusters to accommodate to both local and regional needs. The main commercial land uses in Redondo Beach are located along Artesia Boulevard, Pacific Coast Highway, Torrance Boulevard, Aviation Boulevard, Riviera Village, and North Catalina Avenue (City of Redondo Beach 1992). The areas of Redondo Beach Pier and King Harbor Marina are the most significant coastal-related commercial areas in Redondo Beach, serving as both commercial and recreational assets for the City's residents and regional tourists. There are also several smaller, isolated commercial areas, which may range from a single store to neighborhood-serving shopping centers. These neighborhood-serving shopping centers typically provide necessary and convenient services to the surrounding residential area.

Industrial areas in Redondo Beach allow for light manufacturing, research and development, spacecraft manufacturing and associated aerospace operations, and business park offices. Uses different from, but compatible with, traditional industrial uses are also allowed, including warehouse retail uses, ancillary commercial uses, amusement centers, vehicle sales and services with or without motor vehicle repair, hotels, and motels. Industrial land use in Redondo Beach is limited, with the one major industrial area occurring in the northern end of the City, north of Manhattan Beach Boulevard (City of Redondo Beach 1992). Anchored by the large Northrop Grumman Corporation Space Park complex, the prevailing land use in this area is high-tech industry within an industrial park type of setting. Three other areas within Redondo Beach are also designated as industrial development; however, these areas are smaller and have fragmented ownership.

Public uses and community facilities within Redondo Beach include parks, open space, public schools, the Civic Center (i.e., City Hall, Public Library, and Police Station), a fire station, and the Recreation and Community Services Center. Quasi-public uses include some utility providers as well as privately owned land that serve a public facility or service. Special use districts that serve a specific public function, including the BCHD campus, also contribute to the City's public and institutional land uses.

*Torrance*

Torrance borders the eastern and southern boundaries of Redondo Beach and is approximately three times larger than Redondo Beach, covering approximately 20.6 square miles. Redondo Beach Boulevard, 182nd Street and West 190th Street generally define the northern borders of Torrance. Prospect Avenue and a small portion of the coastline generally define the western border. Western Avenue (SR-213) and Crenshaw Boulevard defines the eastern boundary of Torrance. Much of Torrance's southern boundary is defined by the Boundary Trail, an unpaved hiking trail. SR-107 provides a north-south connection through central Torrance and terminates at its northern end with I-405. I-405 links Torrance to western Los Angeles, including the Los Angeles International Airport (LAX), and to south Los Angeles County and Orange County.

Residential uses make up approximately half of the total land use in Torrance and are dispersed throughout the City at varying development densities. The lowest ~~densities~~ density residential uses are largely located in the western and southern portions of the City, including the single-family residential neighborhoods located immediately adjacent to the west of the Project site (City of Torrance 2010a). Commercial districts in Torrance vary in character and intensity based on location. Commercial districts serving a more local market are dispersed throughout the City in close proximity to residential neighborhoods and at key intersections. Regional commercial

districts along Hawthorne Boulevard, Crenshaw Boulevard, and Pacific Coast Highway cater to a broader population base.

Business park and industrial areas of Torrance are largely concentrated in the east central area of the City and commercial areas are generally clustered around major roadways such as SR-107 and SR-1. Industrial uses in Torrance include traditional industrial processes such as manufacturing, processing, warehousing, packaging or treatment of products, as well as business park uses, which include research and development, warehousing, and office uses, with ancillary commercial uses. Industrial development is concentrated in two main districts: the Central Manufacturing District (generally between Western Avenue and Hawthorne Boulevard, from I-405 to Plaza Del Amo), and the Southern Industrial District that includes airport land and areas north of the airport. The East Victor Precinct located north of Torrance Boulevard and west of Hawthorne Boulevard has a smaller concentration of industrial uses.

Public land uses include the Civic Center, public schools, parks, government facilities, police and fire stations, libraries, and water treatment facilities. Quasi-public uses include land owned by private entities that serve a community-wide function, such as private schools and utility easements.

Project Vicinity

The campus is bordered by commercial land uses to the northwest, recreational land uses to the northeast, and residential land uses to the south, east, and west.

*The Redondo Village Shopping Center is located immediately to the northwest of the Project site and provides retail and dining opportunities for the surrounding community, which is largely occupied by residential housing.*

The Redondo Village Shopping Center is located adjacent to the northwest of the Project site, and is anchored by a Vons grocery store and Shell gas station. The shopping center also includes a fitness studio, pet grooming service, dollar store, and other local dining and retail businesses. The Redondo Village Shopping Center is designated as C-2 (Commercial) in the Redondo Beach General Plan Land Use Element (City of Redondo Beach 1992) and zoned as C-2 (Commercial).

Dominguez Park is located immediately adjacent to the northeast of the Project site across the intersection of Beryl Street & Flagler Lane. This 24-acre park includes grass and trees, picnic areas

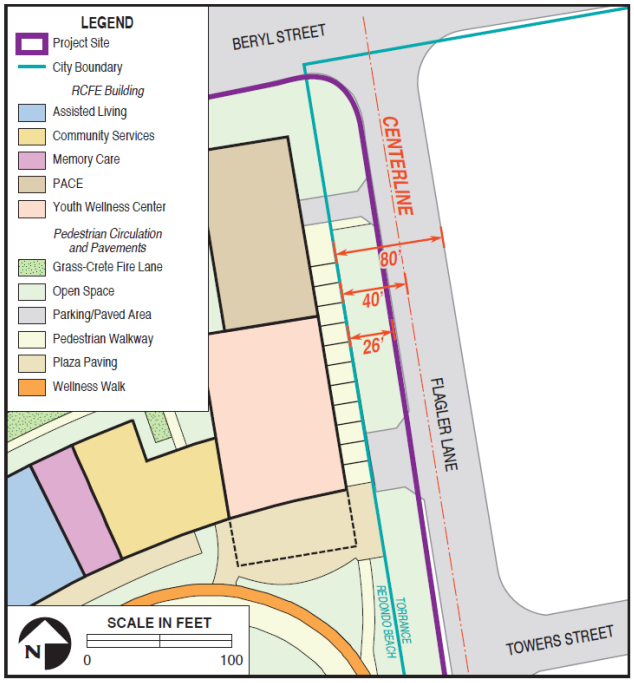
and play equipment, a dog park, Heritage Court, and two Little League fields. Dominguez Park is designated by the City of Redondo Beach as P (Public or Institutional) (City of Redondo Beach 1992) and zoned as P-PRO (Parks, Recreation, and Open Space)

The Project site is also surrounded by single-family residences (R-1) to the south and west, and medium density multi-family residences (RMD) to the north and northwest within Redondo Beach (City of Redondo Beach 1992). The neighborhood bordering the east of the Project site is located within Torrance and is designated as Low Density Residential (R-LO) (City of Torrance 2010b) and zoned as ~~single family residential (R-1)~~R-H/R-1 (Hillside and Local Coastal Overlay Zone [Hillside Overlay]/Single Family Residential District).

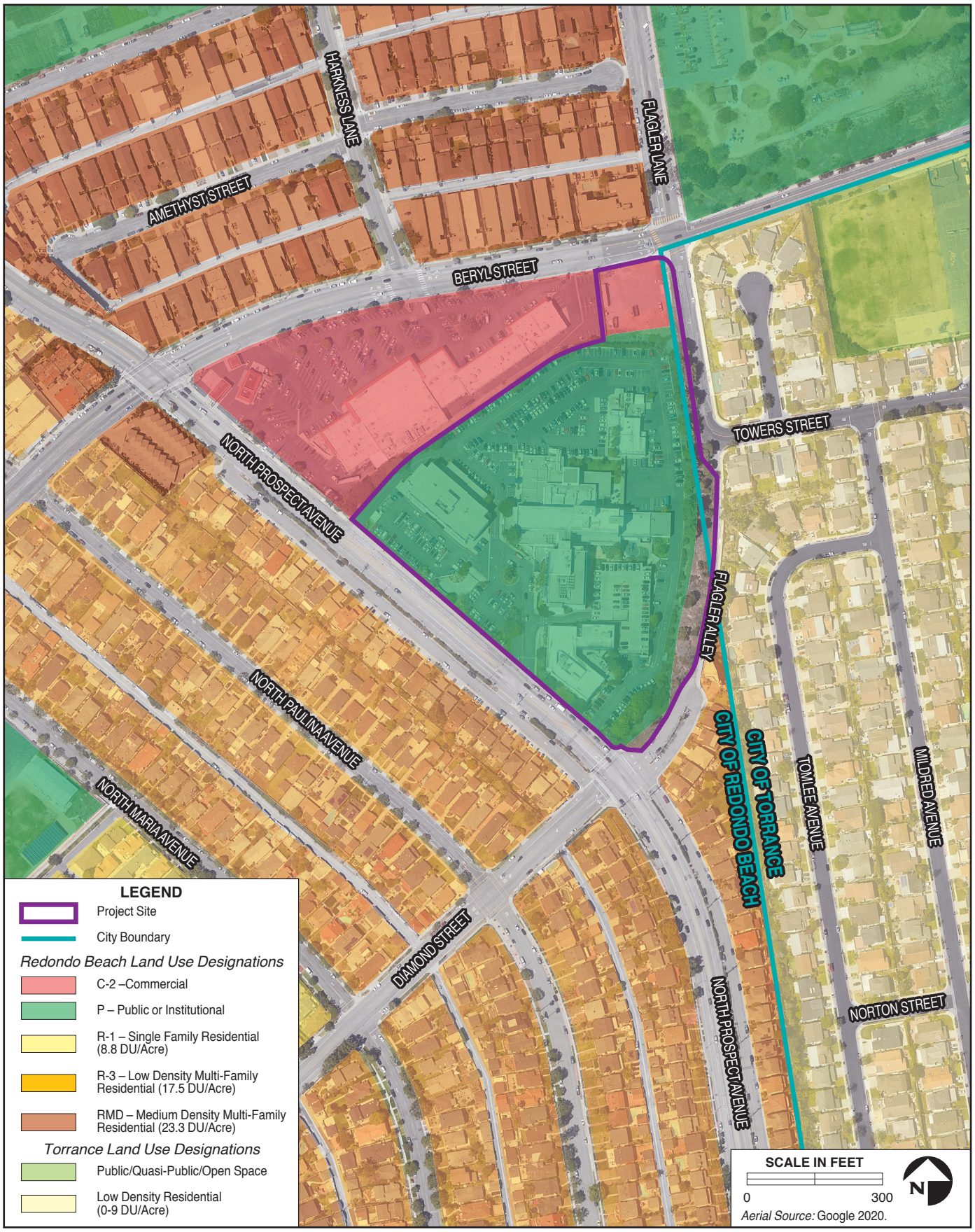
Project Site

As described in Section 2.2.1, *Project Location* the Project site consists of two legal parcels:

- The existing 9.35-acre campus (Assessor's Identification Number [AIN] 7502-017-903), which is designated by the City of Redondo Beach as P (Public or Institutional) and zoned as P-CF (Community Facility). The campus is developed with the former South Bay Hospital (currently operated as the Beach Cities Health Center), an attached maintenance building, two privately operated medical office buildings with space that is individually leased from BCHD, and a parking structure. As shown in Figure 3.10-1 and Figure 3.10-2, the majority of the campus is located within the Redondo Beach; however, the eastern edge of the campus is partially located within the City of Torrance right-of-way along Flagler Lane and Flagler Alley. The City of Torrance right-of-way extends into the vacant Flagler Lot by approximately 26 feet from the edge of the existing paved width of Flagler Lane.



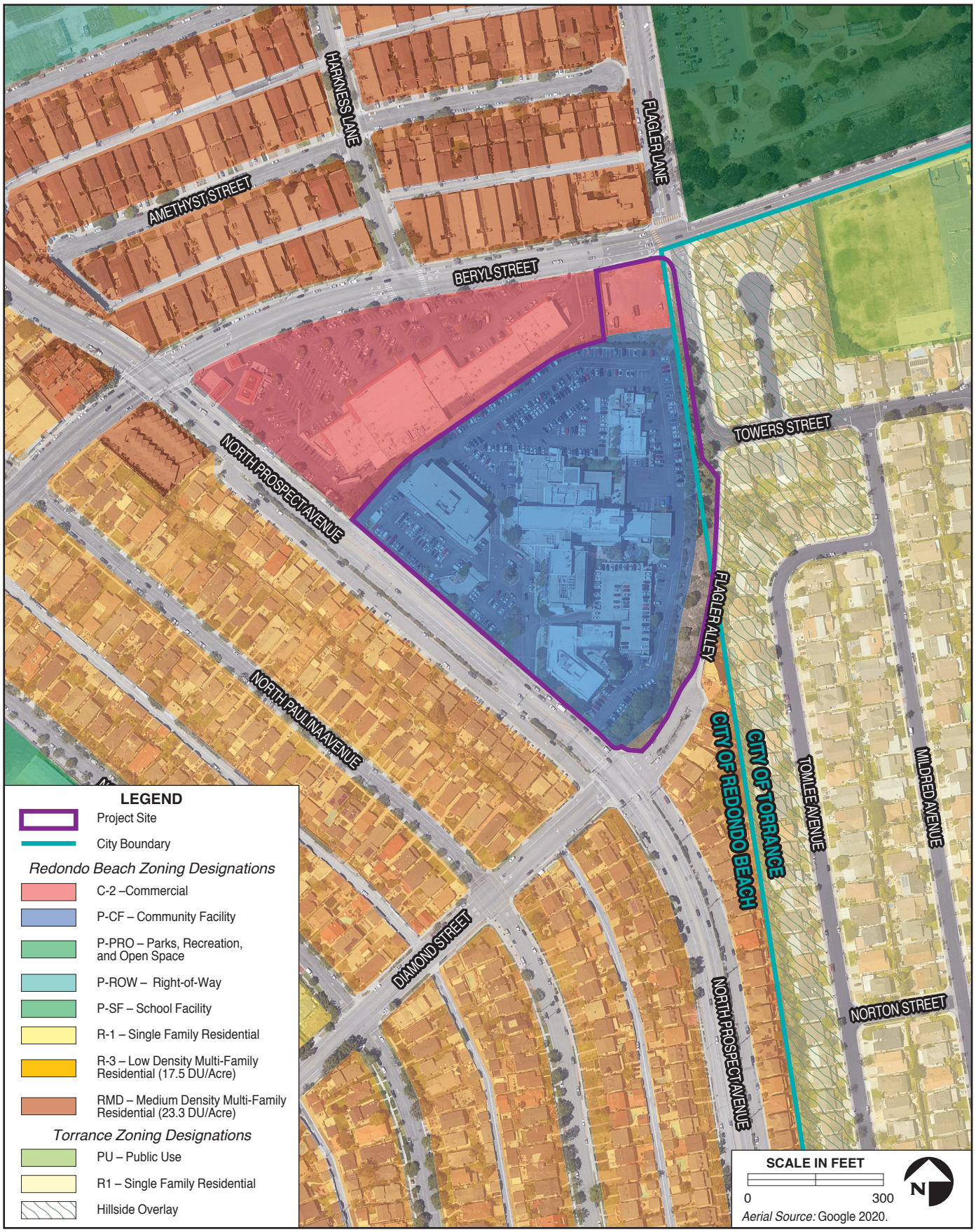

*The City of Torrance right-of-way extends 40 feet from the road centerline and approximately 26 feet from the existing edge of the paved width. Development within the right-of-way would include two new driveways, retaining walls, and landscaping.*




wood.

**Land Use in the Project Site Vicinity**

**FIGURE 3.10-1**

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**Zoning in the Project Site Vicinity**

**FIGURE 3.10-2**

- A 0.43-acre vacant lot owned by BCHD located on the northern edge of and adjacent to the existing campus at the southwest corner of Flagler Lane and Beryl Street (vacant Flagler Lot) (AIN 7502-017-902), which is designated and zoned by the City of Redondo Beach as C-2 (Commercial). This lot is currently undeveloped and is periodically leased by BCHD as a temporary construction staging area for surrounding developments. This lot is currently being leased by The Gas Company as a construction staging area for gas utility improvements in the vicinity. As with the campus, the majority of the vacant Flagler Lot is located with Redondo Beach; however, the eastern edge of the vacant Flagler Lot is partially located within City of Torrance right-of-way along Flagler Lane. The City of Torrance right-of-way extends into the vacant Flagler Lot by approximately 26 feet from the edge of the existing paved width of Flagler Lane.

*The Project site is comprised of two parcels: the existing campus which is designated as P (Public or Institutional); and the vacant Flagler Lot (pictured above), which is located adjacent to the Redondo Village Shopping Center, and designated as C-2 (Commercial).*

### 3.10.2 Regulatory Setting

This section summarizes relevant adopted regional and local land use policies and regulations applicable to the proposed Project. No Federal land use regulations or policies apply to the proposed Project.

<u>State Policies and Regulations</u>

*Senate Bill 375*

The California's Sustainable Communities and Climate Protection Act (Senate Bill [SB] 375) (Steinberg, Chapter 728, Statutes of 2008), adopted on September 30, 2008, aligns the goals of regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocations. SB 375 requires metropolitan planning organizations such as the Southern California Association of Governments (SCAG) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) within their Regional Transportation Plan (RTP) to demonstrate the achievement of GHG reduction targets. In compliance with SB 375,

SCAG has adopted an RTP/SCS, which encompasses Redondo Beach and Torrance as well as other cities and unincorporated land within Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial counties.

Regional Policies and Regulations

*SCAG's Regional Transportation Plan / Sustainable Communities Strategy*

As described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, SCAG's Regional Council unanimously approved and fully adopted the 2020-2045 RTP/SCS (Connect SoCal) (SCAG 2020). The 2020-2045 RTP/SCS includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections. The intent of the plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal plan achieves per capita GHG emissions reductions relative to 2005 of 19 percent in 2035 (SCAG 2020).

*Both Redondo Beach and Torrance fall within the jurisdiction of SCAG, the metropolitan planning organization for six southern California counties. SCAG's RTP/SCS plan outlines goals of enhancing mobility and sustainability in the regional area.*

*2020 Long Range Transportation Plan*

The 2020 Long Range Transportation Plan (LRTP) provides a detailed roadmap for how Los Angeles Metropolitan Transit Authority (Metro) will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP will guide future funding plans and policies needed to move Los Angeles County forward for a more mobile, resilient, accessible, and sustainable future (Metro 2020).

*South Bay Bicycle Master Plan*

The South Bay Bicycle Master Plan is intended to guide the development and maintenance of a comprehensive bicycle network and set of programs and policies throughout El Segundo, Gardena, Hermosa Beach, Lawndale, Manhattan Beach, Redondo Beach, and Torrance for 20 years

following its adoption. Implementation of this plan is meant to promote and increase bicycle ridership for all levels of ability across the South Bay. The Plan's primary objective is to increase the number of bicyclists, as well as create a larger base of utilitarian bicyclists, including bicycle commuters, through safe, accessible and consistent bicycle infrastructure, and supporting policies and programs (Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition 2011).

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan*

The Redondo Beach General Plan is a comprehensive, long-term planning document which serves as the adopted statement of local policy regarding each individual community's development pursuant to California Government Code Section 65300 *et seq.*, for all cities and counties within the State of California. The Redondo Beach General Plan serves as a blueprint for development and land use activities within City limits and establishes goals, policies, and land use designations that are intended to facilitate orderly and planned growth and other development related issues with the City. The General Plan provides broad policy guidance related to Community Development and Resources (Land Use, Senior Services/Child Care Services and Housing); Infrastructure Systems and Community Services (Circulation, Utilities, Solid Waste Management and Recycling and Conservation, Recreation and Parks, and Open Space); and Environmental Hazards/Natural Hazards (Geologic and Seismic Hazards, Noise, Flood Hazards, Toxic Wastes and Materials, and Fire Hazards). Since 2017, the City has been working to update its General Plan. Once completed, the updated General Plan ~~, to be referred to as PLANredondo,~~ will guide the City's foundation for growth and development for the next 20 to 30 years.

*Redondo Beach General Plan Land Use Element*

The Redondo Beach General Plan Land Use Element establishes goals, objectives, policies, and implementation programs to guide the manner in which new development will occur and existing uses will be conserved in the City. As previously described, the land use designation for the existing campus is P (Public or Institutional) and the land use designation of the vacant Flagler Lot is C-2 (Commercial). The P (Public and Institutional) designation is comprised of lands that are owned by public agencies, special use districts, and public utilities. Although this designation encompasses a range of different public and quasi-public uses, they share a common thread in that these uses do not fit well under the typical standards for residential, commercial, or industrial uses. Since this designation includes a variety of uses with a variety of characteristics, no attempt has been made to establish specific development standards within the Redondo Beach General Plan (City of Redondo Beach 1992). As described in Redondo Beach Municipal Code (RBMC) Section

10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district ~~P (Public and Institutional) land use designations~~ are subject to Planning Commission Design Review. The C-2 (Commercial) zoning ~~land use designation~~ provides for retail commercial, eating and drinking establishments, household goods, food sales, drugstores, building materials and supplies, professional offices, personal services, cultural facilities, and similar uses. RBMC Section 10-2.622 sets forth specific development standards for this ~~land use designation~~zoning.

*Redondo Beach General Plan 2013-2021 Housing Element*

As described further in Section 3.12, *Population and Housing*, the Redondo Beach General Plan 2013-2021 Housing Element establishes goals, policies, and ~~implementation measures~~programs to specifically identify ways in which the housing needs of the existing and future resident population can be met~~. The Housing Element also establishes building requirements for mixed-use residential developments in mixed-use and regional commercial land use designations, and to enhance and promote pedestrian-oriented character of the commercial component and the neighborhood~~ (City of Redondo Beach 2017).

*Redondo Beach General Plan Transportation and Circulation Element*

The Redondo Beach Transportation and Circulation Element includes the identification, location, and design of existing and proposed major thoroughfares, transportation routes, pedestrian connections, bicycle facilities, public transit options, trails, and local public utilities and facilities. Key transportation goals of the City include trip reduction, expansion of programs that decrease the number of single-occupant vehicles on the road, promotion of alternative transportation modes, participation in regional transportation planning, and coordinating transportation and land use planning. The Transportation and Circulation Element also focuses on improving bicycle and pedestrian connections throughout the City (City of Redondo Beach 2009).

~~*Redondo Beach General Plan Recreation and Parks Element*~~

~~The Redondo Beach General Plan Recreation and Parks Element contains policies and implementation measures to enhance the unique characteristics of the City. Such policies support ongoing maintenance and facilitate expansion and improvement of parkland, recreational facilities, and programs. The Recreation and Parks Element provides the Redondo Beach Recreation and Community Services Department with measures to maximize the use of existing resources, as well as expand upon available opportunities through creative financing measures and cooperative relationships with other City departments and local agencies and organizations. The Recreation~~

~~and Parks Element describes and categorizes existing park and recreation resources and current conditions, anticipates future needs, outlines, goals, objectives, and policies and an implementation program to meet these goals, objectives, and policies (City of Redondo Beach Recreation and Community Services Department 2004).~~

*General Plan Senior Citizen Services / Child Care Services*

In addition to the elements mandated by California Government Code Section 65302, the Redondo Beach General Plan also includes a Senior Citizen Services / Child Care Services Element (City of Redondo Beach 1993). This element identifies specialized needs of the senior population of the City to include affordable housing, health and day care, transportation, and recreation and social services. The Senior Citizen Services / Child Care Services Element identifies existing facilities and programs for provision of senior citizen services and childcare services, estimates current and projected needs for expanded programs. The Senior Citizen Services / Child Care Services Element contains goals, objectives, and policies that evaluate and expand current services and identify needs for additional services and identify future opportunities for expanded services (City of Redondo Beach 1993).

*Redondo Beach Municipal Code and Zoning Ordinance*

The Redondo Beach Zoning Ordinance (Title 10 of the RBMC) includes regulations for permitted uses, project design and development standards, parking requirements, outdoor space use, and other information regarding land use and development in the City.

Areas zoned as P-CF (Community Facilities) provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community (RBMC Section 10-2.1110). Under RBMC Section 10-2.1110, residential care facilities are allowed in areas zoned as P-CF with a conditional use permit (CUP). As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks are subject to Planning Commission Design Review.

The specific purposes of the C-2 (Commercial), commercial zone regulations are to provide appropriately located areas consistent with the Redondo Beach General Plan for a full range of neighborhood and community-oriented retail sales, services, professional offices, and other commercial uses (RBMC Section 10-2.600). Child day care centers, recreation facilities, and senior housing are all allowed in areas zoned as C-2 (Commercial) with a CUP (RBMC Section 10-2.620). Development standards for C-2 (Commercial) are described in RBMC Section 10-

2.622. Importantly, the FAR of all buildings on a lot shall not exceed 0.5; no building or structure shall exceed a height of 30 feet; and no building shall exceed 2 stories.

City of Torrance Local Policies and Regulations

*Torrance General Plan Land Use Element*

The Torrance General Plan Land Use Element guides future development in accordance with land use patterns and policies to promote an attractive and high-quality community and provide a high quality of life for Torrance residents. The Land Use Element also identifies the need for community facilities that can serve the health, education, and cultural enrichment needs of senior citizens due to the increase in senior-aged citizens. Objectives listed in the Land Use element include:

- Maintain a balanced community by addressing the need for new development that is functionally compatible with the City's existing neighborhoods and districts;
- Implement land use development that coordinates with and improves circulation networks;
- Maintain high-quality, attractive, residential neighborhoods;
- Allow for mixed use development in appropriate areas;
- Provide public and quasi-public land uses for the benefit of community;
- Establish attractive, high quality community through urban design elements; and
- Support revitalization and redevelopment plans.

Land uses immediately adjacent to the east of the Project site are designated as Low-Density Residential (R-LO) under the Torrance General Plan Land Use Element. Development within this land use designation is generally characterized by detached single family dwellings on individual lots (up to nine dwelling units per acre) that form a cohesive neighborhood (City of Torrance 2010d).

*Torrance General Plan Circulation and Infrastructure Element*

The Torrance Circulation and Infrastructure Element plans for the efficient and effective movement of people and goods between destinations within Torrance and throughout the region. The Circulation and Infrastructure Element identifies a transportation system capable of responding to growth occurring consistent with the Land Use Element, and utility systems that provide the service levels Torrance residents and businesses expect. In addition to automobile circulation, the Circulation and Infrastructure Element addresses circulation of pedestrians, cyclists, and transit riders plus aviation services (City of Torrance 2010b).

*Torrance General Plan Community Resources Element*

The goals, objectives, and polices in the Torrance Community Resources Element focus on the enhancement of community qualities that distinguish Torrance. The Community Resources Element combines three elements that were included as separate elements in the previous General Plan: the Conservation, Open Space, and Parks and Recreation Elements. The Community Resources Element contains goals, objectives, and policies that build on current recreation, social services, and resource conservation programs. Policies focus on the preservation and management of open space, providing parks, recreation, and community facilities for all residents, historic preservation, natural resource conservation, preservation of scenic resources, managing energy resources, reducing GHG emissions, and promoting sustainable building practices (City of Torrance 2010c).

*Torrance General Plan 2014-2021 Housing Element*

As described in Section 3.12, *Population and Housing*, the Torrance General Plan 2014-2021 Housing Element includes several programs designed to conserve, preserve, and improve the existing housing stock, encourage the development of more mixed use, multifamily and affordable housing opportunities, reduce governmental constraints to housing production and affordability, and promote equal housing opportunities. The Housing Element consists of the following major components:

- An introduction of the purpose and organization of the Housing Element;
- An analysis of the City's demographic and housing characteristics and trends;
- A review of potential market, governmental, and environmental constraints to meeting the City's identified housing needs;
- An evaluation of land, administrative, and financial resources available to address the housing goals;
- A review of past accomplishments under the previous Housing Element; and
- A Housing Plan to address the identified housing needs, including housing goals, policies, and programs (City of Torrance 2013).

*Torrance Municipal Code*

As previously described, the City of Torrance right-of-way extends into the existing campus and the vacant Flagler Lot by approximately 26 feet from the edge of the existing paved width of Flagler Lane (refer to Figure 3.10-1 and Figure 3.10-2).

Torrance Municipal Code (TMC) Section 92.32.8 guides the use of the public right-of-way. Additionally, TMC Section 92.30.8 guides access to local streets within Torrance. These sections of the TMC are relevant to the proposed Project given that the proposed Project would extend into the City of Torrance right-of-way at three locations. The proposed Project includes two access points with driveways along Flagler Lane. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed for a subterranean service area and loading dock entry/exit, which would require grading and construction of retaining walls (refer to Section 2.5.1.3, *Proposed Access, Circulation and Parking*). These elements of the proposed Project would require grading and building permits from the City of Torrance (refer to Section 1.5, *Required Approvals*). The proposed Project would also re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The proposed grading and landscaping on this portion of the slope would also require a grading permit, landscape plan approval, and site plan review from the City of Torrance (refer to Section 1.5, *Required Approvals*).

### 3.10.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 of the California Environmental Quality Act (CEQA) Guidelines. For purposes of this EIR, implementation of the Project may have a significant adverse impact on land use/planning if it would do any of the following:

a) Physically divide an established community.
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

*Screened-Out Threshold(s):*

- Threshold (a) (*Physically Divide and Established Community*): Redevelopment under the Phase 1 preliminary site development plan and the more general Phase 2 development program would be contained in the existing campus and the adjacent vacant Flagler Lot. The proposed Project would be consistent with existing Redondo Beach General Plan land use designations and the provisions of the zoning code. Moreover, the proposed Project has been designed to be permeable to public movement. The proposed Project includes extensive open space and pedestrian pathways to provide pedestrian access within and through the Project site and therefore improve connectivity between adjacent land uses. The proposed Project would not introduce new land uses or new features (e.g., roads) that

would physically divide or interrupt the connection between surrounding land uses. Therefore, for the reasons stated above and as discussed in Section XI, *Land Use and Planning* of the Initial Study (IS), this issue is not further analyzed in the EIR.

Methodology

*Conflict with a Land Use Plan, Policy, or Regulation*

CEQA Guidelines Section 15125(d) requires that an EIR discuss potential inconsistencies with applicable adopted plans. A project is considered consistent with the provisions of an identified regional and local plan if it meets the general intent of the plans and will further the objectives and policies in the plan. Consistency with Connect SoCal, Metro's LRTP, the South Bay Bicycle Master Plan, Redondo Beach and Torrance General Plans, and Redondo Beach and Torrance Municipal Codes are evaluated in detail below in Impact LU-1. However, in 2018, the California Governor's Office of Planning and Research (OPR) clarified that the focus of the analysis should not be on the *"conflict"* with the plan, but instead, on any adverse environmental impact that might result from a conflict. For example, destruction of habitat that results from development in conflict with a habitat conservation plan might lead to a significant environmental impact. The focus, however, should be on the impact on the environment, not on the conflict with the plan (California Natural Resources Agency 2018). Therefore, elements of the proposed Project that have the potential to conflict with a threshold, goal, policy, or standard are summarized in this section, along with related physical environmental consequences.

### 3.10.4 Project Impacts and Mitigation Measures

Impact Description (LU-1)

*b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.*

**LU-1 The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not cause a significant environmental impact due to a conflict with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Impacts associated with the proposed Project would be *less than significant.***

Development under the Phase 1 preliminary site development plan and the more general Phase 2 development program would be subject to the requirements of Connect SoCal, Metro's LRTP, and the South Bay Bicycle Master Plan as well as the applicable provisions of the Redondo Beach and

Torrance General Plans, municipal codes, and zoning ordinances (refer to Section 3.10.2, *Regulatory Setting*). The relationship between the proposed Project and these long-range plans and local goals, objectives, and polices are discussed in Tables 3.10-1 through Table 3.10-6 below.

As described in Section 3.10.3, *Impact Assessment and Methodology*, the following analysis focuses on the potential conflicts of the proposed Project with applicable plans, goals, and policies adopted for the purpose of avoiding or mitigating an environmental effect, and if conflicts exist, whether any such inconsistency would result in a significant effect on the environment. Only the applicable requirements and provisions have been included in the analysis. For example, development standards for parcels zoned as C-3 or R-1 by the City of Redondo Beach have not been identified given that neither of the parcels comprising the Project site are designed as such. However, the development standards pertaining to parcels zoned as P-CF and C-2 are discussed in detail.

It is important to note that the determinations of the consistency for the proposed Project are provided for CEQA purposes to determine the potential for physical environmental impacts. Unrelated to CEQA, plan, policy and regulatory consistency would be determined as part of the review and approval process with Redondo Beach and Torrance decision-makers during consideration of discretionary approvals for the Phase 1 preliminary site development plan and the more general Phase 2 of development program.

The consistency of the proposed Project with GHG reduction and climate change plans is addressed in Section 3.7, *Greenhouse Gas Emissions and Climate Change.*

*Connect SoCal*

The consistency of the proposed Project – including the Phase 1 preliminary site development plan under Phase 1 and the more general Phase 2 development program – with the applicable goals of Connect SoCal are analyzed in Table 3.10-1. The proposed Project would not conflict with any of the applicable Connect SoCal goals and would not cause a significant environmental impact. Therefore, impacts would be *less than significant* for both the Phase 1 preliminary site development plan and the more general Phase 2 development program.

*Metro 2020 Long Range Transportation Plan*

The Project site is located within Redondo Beach and adjacent to Torrance to the east, both of which are located within Los Angeles County and subject to Metro's 2020 LRTP. Goals of the LRTP focus on improving transportation and the environment and strengthening economic development. As presented in Table 3.10-2, the proposed Project would not conflict with any of

the applicable LRTP strategies and actions. Therefore, impacts would be *less than significant* for both the Phase 1 preliminary site development plan and the more general Phase 2 development program.

**Table 3.10-1. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with Connect SoCal**

| RTP/SCS Goal | Project Consistency |
|---|---|
| **Goal 2.** Improve mobility, accessibility, reliability, and travel safety for people and goods. | **No conflict**. The proposed Healthy Living Campus Master Plan would redevelop the existing campus. As described in Section 2.5.1.3, *Proposed Access, Circulation, and Parking*, changes to the transportation network would be limited to the provision of new access along Beryl Street and within the City of Torrance right-of-way along Flagler Lane. These minor changes to the local transportation network would not affect the regional transportation system. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with, or otherwise impede, RTP/SCS Goals 2, 3, or 4 and would not cause a significant environmental impact. |
| **Goal 3.** Enhance the preservation, security, and resilience of the regional transportation system. | |
| **Goal 4.** Increase person and goods movement and travel choices within the transportation system. | |
| **Goal 5.** Reduce greenhouse gas emissions and improve air quality. | **No conflict**. As described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, the proposed Project would reduce operational GHG emissions largely due to the reduction in mobile GHG emission sources that would occur as a result of higher fuel efficiency standards over time. The proposed Project would also incorporate sustainable design features to reduce GHG emissions associated with building operations. For example, all new buildings developed under the proposed Project would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). Additionally, the proposed buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification and would be WELL Building Certified. Project design would optimize passive design strategies, which use ambient energy sources (e.g., daylight and wind) to supplement electricity and natural gas to increase the energy efficiency. Sustainable design features incorporated into the proposed Project would include photovoltaic solar panels, solar hot water systems, energy efficient heating, ventilation, and air conditioning (HVAC) systems, etc. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with the RTP/SCS Goal 5 and would not cause a significant environmental impact. |

**Table 3.10-1. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with Connect SoCal (Continued)**

| RTP/SCS Goal | Project Consistency |
|---|---|
| **Goal 6.** Support healthy and equitable communities. | **No conflict**. The proposed Project would support healthy and equitable communities by providing a Program of All-Inclusive Care for the Elderly (PACE), expanding community services to provide health-related resources and information for adults and families, and providing health and wellness services to youth participants at the proposed Youth Wellness Center. The proposed Blue Zone café would support BCHD's Blue Zone Project to create a healthier and more productive community. The café would use local produce and produce grown from the proposed Demonstration Garden on-site. The café would include a demonstration kitchen that would support healthy cooking classes for the community. The Phase 2 development program would provide additional recreational and wellness opportunities at the proposed Wellness Pavilion, Aquatics Center, and Center for Health and Fitness (CHF). The CHF would continue to provide a variety of classes for all ages, including senior fitness, weight management, nutrition expertise, and massages. Additionally, the buildings constructed under the Phase 1 preliminary site development plan and the more general Phase 2 development program would be WELL Building Certified to enhance environmental health, behavioral factors, and overall health, with leading practices in building design, construction, and management (refer to Section 2.5.1.5, *Sustainability Features*). Therefore, the proposed Healthy Living Master Plan would not conflict with the RTP/SCS Goal 6 and would not cause a significant environmental impact. |
| **Goal 7.** Adapt to a changing climate and support an integrated regional development pattern and transportation network. | **No conflict**. As described above for RTP/SCS Goal 2, 3, and 4, the proposed Healthy Living Campus Master Plan would redevelop the existing campus and changes to the transportation network would be limited to the provision of new access along Beryl Street and Flagler Lane. As such, the proposed Project would not affect the regional transportation system. The proposed Project would be located in close proximity to several stops along the Beach Cities Transit Line 102 and Class II (i.e., striped) bicycle lanes and would encourage active transportation to and from the Project site. The proposed Project would also promote active transportation by providing publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with RTP/SCS Goal 7 and would not cause a significant environmental impact. |

## Table 3.10-2. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the 2020 LRTP

| LRTP Action | Discussion |
|---|---|
| **Goal 9.** Encourage development of diverse housing types in areas that are supported by multiple transportation options. | **No conflict**. The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would provide regional long-term care services, including a combination of housing, personal care, and healthcare services specific to the needs of elderly residents with varying physical and cognitive limitations and needs for assistance in daily activities. Residents of Assisted Living, and Memory Care, as well as participants in PACE services in Phase 1 may be transported to and from the campus by several shared vans. The proposed Project would also support active transportation options by providing pedestrian linkages through the site and bicycle facilities on-site. The proposed Project would also be located adjacent to several stops along the Beach Cities Transit Line 102 (see Section 3.14, *Transportation*). Therefore, the proposed Healthy Living Campus Master Plan does would conflict with RTP/SCS Goal 9 and would not cause a significant environmental impact. |
| **Action 2.6.e.** Support transportation demand management (TDM) programs and trip reduction initiatives, including telecommuting. | **No conflict.** As described in Section 3.14, *Transportation*, the proposed Project would implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site (see Section 3.14 *Transportation*). The TDM plan would include transit and carpool incentives for employees. The proposed Project would provide designated parking for carpools and vanpools on-site. Additionally, the Assisted Living, Memory Care, and PACE services developed under Phase 1 would share vans to transport several participants at once, which would reduce vehicle trips to the campus. The proposed Project would also feature ride-share amenities (e.g., pick-up/drop-off zones) and designated parking spaces for carpools and vanpools.<br>The proposed Project would also promote active transportation by providing pedestrian linkages through the site and bicycle facilities on-site, which would assist in reducing vehicle trips. For example, the proposed Project would include publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would also encourage active transportation to and from the Project site. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with these actions or this policy of the LRTP and would not cause a significant environmental impact. |
| **Action 3.6.d.** Support local and regional projects that decrease GHG emissions or reduce single-occupant vehicle trips. | |
| **Policy.** Promote Trip Reduction Strategies**.** | |

**Table 3.10-2. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the 2020 LRTP (Continued)**

| LRTP Action | Discussion |
|---|---|
| **Policy.** Support transit-oriented communities. | **No conflict.** The proposed Healthy Living Campus Master Plan is intended to redevelop the existing campus, which is not located within a Transit Priority Area. Nevertheless, the proposed Project would development 157 new residential units, new jobs, and community uses located in close proximity to several stops along the Beach Cities Transit Line 102. The proposed Master Plan would not conflict with this policy of the LRTP and would not cause a significant environmental impact. |

*South Bay Bicycle Master Plan*

The Project site is located within Redondo Beach and adjacent to Torrance to the east, both of which are member agencies of the South Bay Bicycle Master Plan. The South Bay Bicycle Master Plan is intended to guide the development and maintenance of a comprehensive bicycle network throughout its jurisdiction. The plan does not include specific policies or goals for individual development projects. The proposed Project would support the overall goal of the South Bay Bicycle Master Plan by providing bicycle facilities on-site, such as secure, short-term bicycle parking, a bicycle repair station, and employee showers and lockers. The Project site is located adjacent to the existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path. The proposed Project would not alter existing bike paths or preclude future bike paths in vicinity of the proposed Project. As described in Section 3.14, *Transportation*, the proposed Project would integrate with proposed and pending cumulative projects intended to enhance bicycle connections along Flagler Lane. Therefore, the proposed Project would not conflict with the South Bay Bicycle Master Plan and impacts would be *less than significant* for both the Phase 1 preliminary site development plan and the more general Phase 2 development program.

*Redondo Beach General Plan*

The Project site is generally located with Redondo Beach, with the exception of the City of Torrance right-of-way that extends approximately 26 feet from the paved width of Flagler Lane (refer to Section 2.2.1, *Project Site*). The campus is designated as P (Public or Institutional) by the Redondo Beach General Plan and zoned as P-CF (Community Facility) under the Redondo Beach Zoning Ordinance. The vacant Flagler Lot is designated as C-2 (Commercial) by the Redondo Beach General Plan and zoned as C-2 (Commercial) under the Redondo Beach Zoning Ordinance. Redevelopment on these parcels would be subject to standards and policies in the Redondo Beach

General Plan and Zoning Ordinance applicable to these land use and zoning designations. As described in Table 3.10-3, the proposed Project would be consistent with the applicable policies of the Redondo Beach Land Use Element. Therefore, impacts related to conflicts with the Redondo Beach Land Use Element would be *less than significant* for both the Phase 1 preliminary site development plan as well as the more general Phase 2 development program.

The existing Beach Cities Health Center includes the Silverado Beach Cities Memory Care Community with 60 double occupancy Memory Care units. Under the Phase 1 preliminary site development plan, these existing Memory Care units would be relocated to the proposed Residential Care for the Elderly (RCFE) Building. Additionally, the proposed RCFE Building would add 157 new Assisted Living units. These units would provide residential opportunities that accommodate the needs of senior citizens with physical and cognitive limitations. As described in Table 3.10-3, the proposed Project would be consistent with the policies of the Redondo Beach Housing Element. Therefore, impacts related to conflicts with the Redondo Beach Housing Element would be *less than significant* for both the Phase 1 preliminary site development plan as well as the more general Phase 2 development program.

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan**

| Policies | Discussion |
|---|---|
| ***Land Use Element*** | |
| **Policy 1.2.4.** Allow for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located (subject to approval of a Conditional Use Permit and Planning Commission Design Review) in areas classified as Multi-Family Residential (*"R-3," "RMD,"* and *"RH"*), Commercial (*"C-2", "C-3"* and *"C-4"*), Mixed Use (*"MU-1," "MU-2,"* and *"MU-3"*) and Commercial Regional (*"CR"*) on the Land Use Plan map provided that a) it is appropriate at the proposed location; b) it is located within a reasonable walking distance of commercial retail, professional, and social and community services patronized by senior citizens, or has its own private shuttle bus that will provide daily access to these services, or be within a reasonable walking distance of a bus or transit stop providing access to these services. | **No conflict**. The Project site is located on two parcels zoned as P-CF (i.e., the existing campus) and C-2 (i.e., the vacant Flagler Lot). Implementation of the proposed Project would redevelop the Project site with 157 new Assisted Living units and 60 replacement Memory Care units in the proposed RCFE Building along with PACE services, community services, restaurant, and open space. These units would also be located near existing commercial (i.e., Redondo Village Shopping Center), residential, and recreational (i.e., Dominguez Park) land uses as well as Beach Cities Transit Line 102. Additionally, the Assisted Living, Memory Care, and PACE services developed under Phase 1 would share vans to transport residents and participants.<br>As described in RBMC Section 10-2.1116, the FAR, building height, number of stories, and setbacks for development within P (Public and Institutional) land use designations are subject to Planning Commission Design Review. RBMC Section 10-2.622 sets forth specific development standards for C-2 (Commercial). |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policies | Discussion |
|---|---|
| | The proposed development would be ~~largely~~ consistent with the C-2 development standards. For example, the portion of the proposed RCFE Building located on the vacant Flagler Lot would be less than 30 feet tall and less than 2 stories. ~~However~~Additionally, this portion of the proposed RCFE Building would not exceed the 0.5 FAR requirement. ~~Nevertheless, w~~With the Planning Commission Design Review and issuance of a CUP, the proposed Healthy Living Campus Master Plan would not conflict with Policy 1.2.4 of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.42.4**. Permit development to a maximum intensity of a floor area ratio of 0.5 and height of two (2) stories (30 feet) in areas designated as *"C-2"*. | ~~**Potential**~~ **No conflict**. As previously described, the proposed development within the vacant Flagler Lot would be ~~largely~~ consistent with the C-2 development standards. For example, the portion of the proposed RCFE Building located on the vacant Flagler Lot would be less than 30 feet tall and less than 2 stories. ~~However~~Additionally, this portion of the proposed RCFE Building would not exceed the 0.5 FAR requirement. ~~Nevertheless, Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located (subject to Planning Commission Design Review and issuance of a CUP). Additionally, while the FAR would be greater than 0.5, g~~Given that the height of the building within the vacant Flagler Lot would remain within 2 stories and below 30 feet, there would be no physical impact related to aesthetics or visual resources (refer to Section 3.1, *Aesthetics and Visual Resources*). Therefore, ~~while~~ the proposed Healthy Living Master Plan ~~may potentially~~ would not conflict with Policy 1.42.4 of the Redondo Beach General Plan Land Use Element~~, this potential conflict~~ and would not cause a significant environmental impact. |
| **Policy 1.46.1**. Accommodate governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (schools), cultural (libraries, museums, performing and visual arts, etc.), human health, human services, public utility and infrastructure (transmission corridors, etc.), public and private secondary uses, and other public uses in areas designated as *"P"*. | **No conflict**. The portion of the Project site that comprises the existing campus is currently designated as P (Public or Institutional) in the Redondo Beach General Plan Land Use Element and provides human health and wellness services (e.g., CHF, Community Services, public health classes, etc.). The proposed Project would expand existing human health, human services, and recreational facilities, consistent with Policy 1.46.1 and Policy 1.5.1 of the Redondo Beach General Plan Land Use Element. Therefore, the proposed Healthy Living Campus Master Plan |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| **Policy 1.5.1**. Allow for the continuation of existing public recreational, cultural (libraries, museums, etc.), educational, institutional (governmental, police, fire, etc.), and health uses at their present location [areas classified as Public (*"P"*) on the Land Use Plan map] and development of new uses where they complement and are compatible with adjacent land uses. | would not conflict with these policies of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.5.2.** Allow for the development of private recreational, cultural, educational, institutional, and health uses in areas classified as Commercial (*"C-1," "C-2," "C-3," "C-4,"* and *"C-5"*) and religious uses in areas classified as Residential, Commercial, or Mixed Use on the Land Use Plan map, provided that they are compatible with adjacent uses. | **No conflict**. As previously described, the vacant Flagler Lot is zoned as C-2. Implementation of the proposed Project would redevelop the parcel zoned as C-2 with a vehicle driveway and pick-up/drop-off zone as well as a portion of the RCFE Building that would support the Assisted Living and PACE services. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with the Policy 1.5.2 of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.53.6.** Require that on-site parking structures be designed as an integrated component of the building's architectural design character; including the incorporation of elements which continue and reinforce the architectural design of the primary structure and convey the visual *"sense"* of an occupied building (use of windows, arcades, overhangs, entries, recessed walkways, spandrels, articulated columns and rooflines, and other elements). | **No conflict**. As described further in Section 3.1, *Aesthetics and Visual Resources*, the proposed parking structure that would be constructed under the Phase 2 development program including 292,500 square feet (sf) with up to 2 subterranean levels and up to 8.5 above ground levels providing 736 parking spaces. The proposed parking structure would be designed as an aesthetically cohesive element of the campus consistent with the proposed RCFE Building constructed during Phase 1 as well as the Wellness Pavilion, Aquatics Center, and CHF constructed during Phase 2. The proposed Healthy Living Campus Master Plan would not conflict with Policy 1.53.6 of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.55.2.** Select landscape and tree species which complement the architectural design of structures and reflect the intended functional, physical, and visual character of the district in which they are located | **No conflict**. The proposed Project would redevelop the existing impervious surfaces on the campus with programmable landscaped open space. The proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – includes a landscaping plan with manicured, low-water use lawns, shrubbery and groundcover, ornamental flowering trees, and large shade canopy trees (refer to Figure 2-7). The western and eastern border of the campus would be lined with intermittent large shade canopy trees and smaller shade trees. The northern border would be lined with shade and flowering ornamental trees. Placement of these perimeter trees would soften views from the surrounding residences and the Redondo Village |
| **Policy 1.55.3.** Require that development projects submit and implement a landscaping plan. | |
| **Policy 1.55.5** Encourage developers to incorporate mature and specimen trees and other significant vegetation which may exist on a site into the design of a development project for that site (I1.18). | |
| **Policy 1.55.6.** Require that surface parking lots incorporate trees which will provide extensive shade cover within two years of completion of construction (e.g., canopy coverage versus vertical palms) | |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| **Policy 1.55.7.** Encourage the use of drought-tolerant species in landscape design | Shopping Center (refer to Section 3.1, *Aesthetics and Visual Resources*). Larger trees would also be planted within and adjacent to the proposed surface parking lot constructed during Phase 1 and nearby the proposed building footprints to provide shade. The required landscape plans would be submitted to the Redondo Beach Building & Safety Division for review and approval prior to the issuance of demolition, grading, or building permits. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with these policies of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.55.8.** Require that development incorporate adequate drought-conscious irrigation systems and maintain the health of the landscape | **No conflict**. The plant species selections in the proposed landscaping plans are based on their drought resistance and ability to withstand local conditions such as temperature and shade. As described in Section 2.5.1.5, *Sustainability Features*, the proposed Project would incorporate a high-efficiency irrigation system, consistent with Policy 1.55.8. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with the Policy 1.55.8 of the Redondo Beach General Plan Land Use and would not cause a significant environmental impact. |
| **Policy 1.57.6.** Require that the renovation of existing structures or new development on sites served by parking lots located on adjacent residentially-zoned property restrict the access to such parking areas to the commercial zone frontage, unless there are no feasible alternatives, and that areas facing, abutting, or exposed to residential areas be extensively landscaped to include a screen wall incorporating evergreen plant material (covering a majority of the wall within a one year period. | **No conflict**. The proposed Project would include the removal of the existing northern surface parking lot and the associated perimeter circulation road located at the northern edge of the Project site. As described in Section 2.5.1.3, *Proposed, Access, Circulation, and Parking*, the primary entrance to the campus would remain along North Prospect Avenue. Surface parking lots would also be concentrated on this side of the campus. Additionally, as described in Section 3.1, *Aesthetics and Visual Resources* perimeter green space and landscaping would soften the campus interface from the surrounding residential uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees that would be clustered for a natural look. The campus's northern border would be lined with shade and flowering ornamental trees to screen views from the Redondo Village Shopping Center. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 1.57.6 of the Redondo Beach |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.58.3.** Require that all development be designed to provide adequate space for access, parking, supporting functions, open space, storage, and other pertinent elements | **No conflict**. While the primary vehicle ingress and egress would continue to be provided from the existing main entrance and the two secondary entrances along North Prospect Avenue, the proposed Project would provide two new access points to the Project site – the proposed pick-up/drop-off zone driveway accessible via a right-turn along eastbound Beryl Street and the service and loading dock entry provided off Flagler Lane.<br>Phase 1 of the proposed Project would provide a 40,725-sf landscaped surface parking lot providing for 86 parking spaces (including accessible parking spaces) within the center of the campus. The existing western surface parking lot and subterranean parking garage that front the Providence Little Company of Mary Medical Institute Building would remain in place. During Phase 2, the existing parking structure located at 512 North Prospect Avenue would be demolished to provide space for a new parking structure providing up to 292,500 sf with up to 2 subterranean levels and up to 8.5 above ground levels providing 736 parking spaces. With the addition of these parking spaces in Phase 1 and Phase 2 the proposed Project would meet the required parking demand of the uses on the Project site.<br>The proposed Project would substantially increase publicly accessible open space on the campus, with the addition of programable open space in the central area of the campus. Additionally, each of the proposed buildings would include adequate storage space for utilities, janitorial supplies, and other equipment.<br>Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 1.58.3 of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.60.1.** Require that proposed development be subject to review to identify its environmental impacts and appropriate mitigation measures in accordance with the California Environmental Quality Act | **No conflict**. This EIR has been prepared by the lead agency, BCHD, with close coordination from the Responsible Agencies, the City of Redondo Beach and the City of Torrance, to identify potential environmental impacts and appropriate mitigation measures including necessary timing and monitoring of these mitigation measures. Due to the location of the Project site within Redondo Beach and partially within the City of Torrance right-of-way along Flagler Lane, the EIR considers compliance with the standards and requirements of both cities as well as Federal and State |
| **Policy 1.60.2.** Monitor the impacts of development and effectiveness of mitigation measures on the City's infrastructure, services, and environment and, as necessary, initiate the following actions to account for the defined impacts: a. review and modify the locations, densities, and/or design and development standards contained in this Plan; b. implement capital | |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| improvements, public services, or other mitigation programs; c. require additional developer mitigation; and/or d. impose fees on new and/or existing development (as authorized by State of California nexus legislation) for the implementation of mitigation programs | standards. Where impacts are identified as potentially significant, mitigation measures are required in the respective resource area sections. A complete Mitigation, Monitoring, and Reporting Program (MMRP) ~~will be~~ have been provided with the Final EIR. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with these policies of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 1.60.3.** Work with other public agencies to ensure that their facilities and operations in the City of Redondo Beach are managed in a manner to prevent adverse environmental impacts and comply with pertinent State and Federal standards and requirements | |
| **Policy 1.60.5.** Participate in inter-jurisdictional and regional environmental management and mitigation programs with adjoining cities in the region. | |
| ***Housing Element Policies*** | |
| **Policy 1.7.** Promote the use of energy conservation techniques and features in the rehabilitation of existing housing. | **No conflict.** The proposed Project incorporates sustainable design features to promote the use of energy conservation and reduce GHG emissions associated with building operations. For example, all new buildings constructed under the Phase 1 preliminary site development plan and the more general Phase 2 development program would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). Additionally, the proposed buildings would meet the equivalent of LEED Gold Certification and would be WELL Building Certified. The proposed development would optimize passive design strategies, which use ambient energy sources (e.g., daylight and wind) to supplement electricity and natural gas to increase the energy efficiency. Sustainable design features incorporated into the proposed Project would include photovoltaic solar panels, solar hot water systems, energy efficient HVAC systems, etc. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 1.7 of the Redondo Beach General Plan Housing Element and would not cause a significant environmental impact. |
| **Policy 2.4.** Address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, supportive housing, and single-room occupancy units. | **No conflict.** Seniors and persons with disabilities are included in the City of Redondo Beach's definition of persons and households with special needs. The proposed RCFE Building constructed during Phase 1 of the proposed Project would provide long-term care services including a combination of housing, personal care, and healthcare services specific to the needs of elderly residents with varying limitations and needs for assistance in daily activities. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 2.4 of the Redondo Beach General Plan |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | Housing Element and would not cause a significant environmental impact. |
| **Policy 2.5.** Promote the use of energy conservation features in the design of residential development to conserve natural resources and lower energy costs. | **No conflict.** Refer to the discussion for Policy 1.7 of the Redondo Beach General Plan Housing Element. The proposed Healthy Living Campus Master Plan would not conflict with Policy 2.5 of the Redondo Beach General Plan Housing Element and would not cause a significant environmental impact. |
| **Policy 3.2.** Encourage development of residential uses in strategic proximity to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes. | **No conflict.** The proposed Healthy Living Campus Master Plan would establish residential, medical office, community service, office, gym, restaurant, and open space uses within the fabric of an existing suburban environment. The proposed Project would also provide community activities and events, such as local farmers' markets, fitness classes, and outdoor movie nights to engage with the local community. The Project site is also located immediately adjacent to and would be integrated with existing recreational amenities (i.e., Dominguez Park) and commercial uses (i.e., Redondo Village Shopping Center). Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 3.2 of the Redondo Beach General Plan Housing Element and would not cause a significant environmental impact. |
| **Policy 3.5** Allow flexibility within the City's standards and regulations to encourage a variety of housing types. | **No conflict.** The proposed Project, while not zoned for residential use, would provide needed housing for seniors including seniors with varying limitations and needs for assistance in daily activities that limit their ability to live independently. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 3.5 of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy 5.2.** Provide equal access to housing for special needs residents such as the homeless, elderly, and disabled. | **No conflict.** While the proposed Project would not provide housing accommodations for the homeless, the proposed Project would replace 60 existing Memory Care units (120 beds) on-site and provide 157 new Assisted Living units (177 beds) within the proposed RCFE Building. The proposed Project would provide long-term care services including a combination of housing, personal care, and healthcare services specific to the needs of elderly residents with varying physical and cognitive limitations and needs for assistance in daily activities. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 5.2 or Policy 5.3 of the Redondo Beach General Plan Housing Element and would not cause a significant environmental impact. |
| **Policy 5.3**. Promote the provisions of disabled-accessible units and housing for mentally and physically disabled. | |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| ***Senior Citizen Services / Child Care Services Element Policies*** | |
| **Policy 4.2.1.** Continue to develop, manage, and expand the Redondo Beach's senior services and programs as an important social service within the community, as funding and operational conditions permit. | **No conflict**. The existing Beach Cities Health Center includes 60 Memory Care units and the Community Services program, which primarily involves at-home older adult care services. Phase 1 of the proposed Project would replace the 60 Memory Care units (120 beds) and provide 157 new Assisted Living units (177 beds) within the proposed RCFE Building. The proposed RCFE Building would also include a PACE program, which is a Medicare and Medicaid program that provides medical and social services to adults ages 55 and over. The PACE program would provide services that include adult day care, meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. Under Phase 2 of the proposed Project, PACE participants could also potentially access the heated therapy pool in the Aquatics Center and the CHF facilities (e.g., weight rooms, therapy pool, physical therapy rooms, etc.). Therefore, the proposed Healthy Living Campus Master Plan would not conflict with the goals of the Redondo Beach General Plan Senior Citizen Services / Child Care Services Element and would not cause a significant environmental impact. |
| **Policy 4.2.11.** Consider providing assistance to regional adult day care facilities and other organizations that are able to demonstrate a need for reduced fees or enhanced services for Redondo Beach resident senior citizens, as funding allows. | |
| ***Transportation Element Policies*** | |
| **Policy 1.** Support transit-oriented development that reduces current automobile trips. | **No conflict**. The existing campus is not located within a Transit Priority Area and limited transit opportunities exist within the vicinity. However, the proposed Project would implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site (see Section 3.14 *Transportation*). The TDM plan would include transit and carpool incentives for employees. The proposed Project would provide designated parking for carpools and vanpools on-site. Additionally, the Assisted Living, Memory Care, and PACE services developed under Phase 1 would share vans to transport several participants at once, which would reduce vehicle trips to the campus. The proposed Project would also feature ride-share pick-up amenities (e.g., pick-up/drop-off zones) and designated parking spaces for carpools and vanpools.<br>The proposed Project would also promote active transportation by providing pedestrian linkages through the site and bicycle facilities on-site, which would assist |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | in reducing vehicle trips. For example, the proposed Project would include publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would also encourage active transportation to and from the Project site.<br>Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 1 of the Redondo Beach General Plan Transportation Element and would not cause a significant environmental impact. |
| **Policy 12.** Require new developments to provide sufficient parking to meet demand. | **No conflict**. Refer to the discussion for Policy 1.58.3 of the Redondo Beach Land Use Element. Phase 1 of the proposed Project would provide a 40,725-sf landscaped surface parking lot providing for 86 parking spaces (including accessible parking spaces) within the center of the campus. The existing western surface parking lot and subterranean parking garage that front the Providence Little Company of Mary Medical Institute Building would remain in place.<br>During Phase 2, the existing parking structure located at 512 North Prospect Avenue would be demolished to provide space for a new parking structure provided up to 292,500 sf with up to 2 subterranean levels and up to 8.5 above ground levels providing 736 parking spaces. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 12 of the Redondo Beach General Plan Transportation Element and would not cause a significant environmental impact. |
| **Policy 14.** Increase the provision of bike lockers, bike racks, and lighting for bike facilities. | **No conflict**. The proposed Project would provide secure, on-site short-term bicycle parking, a bicycle repair station, and shower and locker facilities for visitors and employees to encourage multimodal transportation commuting. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 14 of the Redondo Beach General Plan Transportation Element and would not cause a significant environmental impact. |
| **Policy 28.** Close existing gaps in sidewalk infrastructure where necessary, maintain existing sidewalks in good repair, and require sidewalks with all new development. | **No conflict**. Refer to the discussion for Policy 1 of the Redondo Beach Transportation Element. The proposed Project would include publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site and off-site connectivity with |

**Table 3.10-3. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | the existing sidewalks adjacent to the Project site. Therefore, the proposed Master Plan does not conflict with Policy 28 of the Redondo Beach General Plan Transportation Element and would not cause a significant environmental impact. |
| **Policy 29.** Provide climate-appropriate landscaping, adequate lighting, and street amenities to make walking safe, interesting, and enjoyable. | **No conflict**. Plant species selections in the proposed landscaping plans are based on their drought resistance and ability to withstand local conditions such as temperature and shade (refer to Section 3.3, *Biological Resources*). Additionally, the Project site would include publicly accessible ground-level open space traversed with pedestrian pathways. Open space areas would include an entry plaza featuring directional signage, public art, seating areas, and water feature, a tree-lined pedestrian promenade, and a relocated demonstration garden, making walking safe, interesting, and enjoyable. Therefore, the proposed Healthy Living Campus Master Plan would not conflict with Policy 29 of the Redondo Beach General Plan Transportation Element and would not cause a significant environmental impact. |
| ***Parks and Recreation Element Policies*** | |
| **Policy 8.2b.4.** Improve neighborhood access to existing parks, the beach, and other open space and recreational areas. Ensure recreation areas are accessible to the elderly and persons with disabilities. | **No conflict**. The proposed Project would redevelop the existing campus and expand community facilities and recreational facilities. For example, development under the Phase 1 preliminary site development plan would provide approximately 114,830 sf of open space. This would include a central lawn that could support outdoor fitness classes and movie nights, a tree-lined promenade that could support farmers' markets and health fair expositions, sensory gardens with water features and sculptures, and shaded gathering areas for small groups, butterfly habitat, and a walking labyrinth. The proposed Aquatics Center, which would be developed under the Phase 2 development program, would feature pools that could be used for in-water-therapy and exercise purposes targeted towards older adults. The proposed CHF would include a gym featuring exercise equipment and provide a variety of exercise classes, including senior fitness classes. Proposed ground-level open space and pedestrian pathway improvements would be gently sloping and designed to comply with the Americans with Disabilities Act (ADA). Therefore, the proposed Healthy Living Campus Master Plan would not conflict with these policies of the Redondo Beach General Plan Parks and Recreation Element and would not cause a significant environmental impact. |
| **Policy 8.2c.1.** Provide a wide variety of high quality recreation facilities to ensure creative and constructive use of leisure time for residents. | |
| **Policy 8.2c.2**. Maintain and, if necessary, upgrade existing recreation facilities to respond to changes in demographics, preferences, and technology. | |
| **Policy 8.2c.4.** Consider providing a heated swimming pool for water-therapy/exercise purposes for the public, particularly senior citizens. | |
| **Policy 8.2d.4** As funding is available, provide a wide range of recreation and community programs including art, cultural awareness, nature study, education, concerts/entertainment, job development and employment skills, health, sports/exercise, and human services that reflect the diversity of the City with respect to gender, ethnicity, age, socioeconomic status, and special needs. | |

The existing campus currently provides health and wellness programs to promote community health and well-being. Under the proposed Project, the existing campus would be redeveloped to expand recreational and community service facilities and programs available to residents. As described in Table 3.10-3, the proposed Project would be consistent with applicable Redondo Beach Parks and Recreation Element goals and policies. Therefore, impacts related to conflicts with the Parks and Recreation Element would be *less than significant* for both the Phase 1 preliminary site development plan as well as the more general Phase 2 development program.

*City of Redondo Beach Municipal Code Development Standards*

As previously described, the land use designation for the existing campus is P (Public or Institutional) and the land use designation of the vacant Flagler Lot is C-2 (Commercial). As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks for development within P (Public and Institutional) land use designations are subject to Planning Commission Design Review. RBMC Section 10-2.622 does prescribe specific development standards for parcels zoned as C-2 in the Redondo Beach Zoning Ordinance. The consistency of the proposed Project with these development standards is discussed in Table 3.10-4. As described in Table 3.10-4, the development within the vacant Flagler Lot would not exceed the 0.5 FAR requirement~~; however, Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located (subject to Planning Commission Design Review and issuance of a CUP)~~. ~~Additionally, while the FAR would be greater than 0.5, g~~Given that the height of the building within the vacant Flagler Lot would remain within 2 stories and below 30 feet, there would be no physical impact related to aesthetics or visual resources (refer to Section 3.1, *Aesthetics and Visual Resources*). Therefore, ~~while~~ the proposed Healthy Living Master Plan ~~may potentially~~ would not conflict with RBMC Section 10-~~5~~2.622~~, this potential conflict would not cause a significant environmental impact~~. ~~Therefore, i~~Impacts related to conflicts with RBMC development standards would be *less than significant* for both the Phase 1 preliminary site development plan under Phase 1 as well as the Phase 2 development program.

## Table 3.10-4. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach Municipal Code

| Policies | Discussion |
|---|---|
| ***RMBC Section 4-24.503 Construction Noise*** | |
| (a) All construction activity shall be prohibited, except between hours of 7:00 a.m. and 6:00 p.m. on Monday, Tuesday, Wednesday, Thursday, and Friday and between the hours of 9:00 a.m. and 5:00 p.m. on Saturday. No construction activity shall be permitted on Sunday, or the days on which the holidays designated as Memorial Day, the Fourth of July, Labor Day, Thanksgiving Day, Christmas Day, and New Year's Day are observed.<br>(b) In the case of an emergency, the Building Officer may issue a permit for construction activity for periods during which construction activity is prohibited by subsection (a) of this section. Such permit shall be issued for only the period of the emergency. Where feasible, the Building Officer shall notify the residential occupants within 300 feet of any emergency construction activity of the issuance of any permit authorized by this subsection. | **No conflict**. As described in Section 2.5.1.6, *Construction Hours*, BCHD would comply with the construction hours prescribed by the City of Redondo Beach. Therefore, while construction noise level would exceed the Federal Transit Authority (FTA) significance criteria identified in Section 3.11, *Noise*, the proposed Healthy Living Campus would not conflict with RBMC Section 2-24.503. |
| ***RBMC Section 9-23.01 – Adoption of 2019 California Green Building Standards Code*** | |
| Those certain documents, one copy of which is on file in the office of the City Clerk, being marked and designated as the 2019 California Green Building Standards Code (CAL-Green), Part 11, be and the same are hereby adopted as the Code of the City for regulating the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, equipment, use, height, area, and maintenance of all buildings and/or structures in the City; providing for the issuance of permits and all collection of fees therefor; and providing penalties for violations of such Code; and each and all of the regulations, provisions, penalties, conditions, and terms of such 2019 California Green Building Standards Code (CAL-Green), Part 11 are hereby referred to, adopted, and made a part of this chapter as if fully set forth in this chapter, subject to the additions, deletions, and amendments set forth in this chapter. | **No conflict**. Refer to the discussion for Policy 1.7 of the Redondo Beach General Plan Housing Element. All new buildings constructed within Redondo Beach under the Phase 1 preliminary site development plan and Phase 2 development program would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). Additionally, the proposed buildings would meet the equivalent of LEED Gold Certification and would be WELL Building Certified. As such, the proposed Healthy Living Campus Master Plan would not conflict with RBMC Section 9-23.01 and would not cause a significant environmental impact. |
| ***RBMC Section 10-~~5~~2.622 Development Standards: C-2 Commercial Zone*** | |
| Floor Area Ratio. The floor area ratio (F.A.R.) of all buildings on a lot shall not exceed 0.5 | ~~**Potential**~~ **No conflict**. Refer to the discussion for Policy 1.42.4 of the Redondo Beach General Plan Land Use Element. The proposed development within the vacant Flagler Lot would be ~~largely~~ consistent with the C-2 development standards. For example, the proposed RCFE Building would be less than 30 feet tall and less than 2 stories. ~~However, t~~The proposed RCFE Building would not exceed the 0.5 FAR requirement. ~~Nevertheless,~~ |
| Building height. No building or structure shall exceed a height of thirty (30) feet. | |
| Stories. No building shall exceed two (2) stories | |
| Setbacks. The minimum setback requirements shall be as follows: | |

## Table 3.10-4. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Redondo Beach Municipal Code (Continued)

| Policies | Discussion |
|---|---|
| 1. Front setback. There shall be a minimum front setback of five (5) feet the full width of the lot, except where a lot is contiguous to a residentially zoned lot fronting on the same street, in which case the required front setback shall be the same as required for the contiguous residential lot.<br>2. Side setback.<br>a. There shall be a minimum side setback of ten (10) feet the full length of the lot on the street side of a corner or reverse corner lot.<br>b. No side setback shall be required along the interior lot lines, except where the side lot line is contiguous to a residential zone, in which case the following standards shall apply:<br>i. There shall be a minimum side setback of twenty (20) feet the full length of the lot;<br>ii. The required side setback may be modified pursuant to Planning Commission Design Review (Section 10-5.2502).<br>3. Rear setback. No rear setback shall be required, except where the rear lot line is contiguous to a residential zone, in which case the following standards shall apply:<br>a. There shall be a minimum rear setback of twenty (20) feet the full width of the lot;<br>b. The required rear setback may be modified pursuant to Planning Commission Design Review | ~~Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located (subject to Planning Commission Design Review and issuance of a CUP). Additionally, while the FAR would be greater than 0.5, g~~Given that the height of the building within the vacant Flagler Lot would remain within 2 stories and below 30 feet, there would be no physical impact related to aesthetics or visual resources (refer to Section 3.1, *Aesthetics and Visual Resources*). ~~Therefore, while the proposed Healthy Living Master Plan may potentially conflict with RBMC Section 10-5.622, this potential conflict would not cause a significant environmental impact.~~ |
| ***RBMC Section 10-~~5~~2.1900 Landscaping Regulations*** | |
| RBMC Section 10-~~5~~2.1900 establishes standards for installation of landscaping in order to enhance the aesthetic appearance of properties within the City, ensure the quality, quantity, and appropriateness of landscape materials, effect a functional and attractive design, improve compatibility between land uses, conserve water, control soil erosion, and preserve the character of existing neighborhoods. | **No conflict**. Construction under the Phase 1 preliminary site development plan would require the removal of approximately 20 landscaped trees along Flagler Lane (north of Towers Street) and approximately 60 trees along the northern perimeter of the campus to provide space for the proposed footprint of the RCFE Building. Additionally, construction under Phase 1 would require removal of an additional 20 landscaped trees along Diamond Street to provide space for the Southern California Edison (SCE) Substation. Similarly, while a site development plan has not yet been selected for Phase 2, the development program would also require the removal of additional landscaped trees and shrubs within the interior portions of the existing campus.<br>As described in Section 3.3, *Biological Resources*, the proposed landscaping plans would replace this vegetation with new vegetation that meets the landscaping regulations provided in RBMC Section 10-~~5~~2.1900.<br>Therefore, the proposed Healthy Living Campus Master Plan would not conflict with RBMC Section 10-~~5~~2.1900 and would not cause a significant environmental impact. |

*Torrance General Plan*

As described in Section 2.2.1, *Project Location*, the proposed Project would extend into the City of Torrance right-of-way at three locations. The proposed Project includes two access points with driveways along Flagler Lane. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed for a subterranean service area and loading dock entry/exit, which would require grading and construction of retaining walls (see Section 2.5.1.3, *Proposed Access, Circulation and Parking*). These elements of the proposed Project would require grading and building permits from the City of Torrance (refer to Section 1.5, *Required Approvals*).

The proposed Project would also re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The proposed grading and landscaping on this portion of the slope would also require a grading permit, landscape plan approval, and site plan review from the City of Torrance (refer to Section 1.5, *Required Approvals*).

As such, the analysis of potential conflicts with the Torrance General Plan is limited to the proposed development within the City of Torrance right-of-way.

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan**

| Policy | Discussion |
|---|---|
| ***Land Use Element*** | |
| **Policy LU.2.1.** Require that new development be visually and functionally compatible with existing residential neighborhoods and industrial and commercial areas. | **No conflict.** The proposed Project would redevelop the existing campus in two phases. The proposed RCFE Building constructed during Phase 1 would be located within the boundaries of Redondo Beach and would be subject to the requirements of the RBMC including a Planning Commission Design Review. While the proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – would alter the visual character of the Project site and surrounding area, this change would be consistent with adopted Redondo Beach General Plan policies for architectural design, massing, landscaping, and pedestrian orientation, as well as the development guidelines prescribed by the RBMC for parcels zoned as C-2 (refer to Section 3.1, *Aesthetics and Visual Resources*). |
| **Policy LU.2.3.** Consider both the impact of a proposed development on surrounding property and the impact of existing uses on new development. | |

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | The proposed RCFE Building constructed during Phase 1 and the proposed building(s) constructed during Phase 2 would not encroach on the City of Torrance right-of-way. As previously described, improvements within the City of Torrance right-of-way would be limited to the proposed pick-up/drop-off zone exit as well as the proposed subterranean service area and loading dock entry/exit. Additionally, the proposed Project would re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus.<br>As such, the development within the right-of-way would be limited to grading and the construction of retaining walls and pavements. This development within the right-of-way would not be visually incompatible with the surrounding residential neighborhood or commercial area. The proposed the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would also be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane (refer to Section 3.3, *Biological Resources*). This landscaping would soften the views of the proposed buildings located within Redondo Beach in relation to surrounding residential uses to the east in Torrance.<br>Therefore, the proposed development and landscaping with the City of Torrance right-of-way would not conflict with the Policy LU.2.1 and LU.2.3 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.2.5.** Establish landscape or hardscape buffers between residential and non-residential uses, where appropriate, to minimize adverse effects. | **No conflict.** The proposed Project would re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The perimeter of the campus would be planted with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees. Specifically, the eastern border of the campus within the City of Torrance right-of-way would be lined with intermittent large shade canopy trees and smaller shade trees that would be clustered for a natural look (refer to Figure 2-7). The proposed the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane (refer to Section 3.3, *Biological Resources*). This landscaping would soften the views of the proposed buildings located within Redondo Beach in relation to |

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | surrounding residential uses to the east in Torrance. Therefore, the proposed landscaping within the City of Torrance right-of-way would not conflict with the Policy LU.2.5 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.3.1:** Require new development to be consistent in scale, mass, and character with structures in the surrounding area. For distinct neighborhoods and districts, consider developing design guidelines that suit their unique characteristics. Create guidelines that offer a wide spectrum of choices and that respect the right to develop within the context of existing regulations. | **No conflict.** Refer to the discussion for Policy LU.2.1 and Policy LU.2.3 of the Torrance General Plan Land Use Element. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy LU.3.1 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.3.4.** Continue to encourage the maintenance and upgrading of existing development. | **No conflict.** The proposed Project would redevelop the existing campus eliminate existing seismic safety issues associated with the former South Bay Hospital Building (514 North Prospect Avenue) within Redondo Beach. The development within the City of Torrance right-of-way would contribute to the creation of a modern campus with public open space. Therefore, the proposed development and landscaping with the City of Torrance right-of-way would not conflict with Policy LU.3.4 of the Torrance General Plan. |
| **Policy LU.4.2.** Encourage the use of development design and amenities that support transit and other alternative forms of transportation, including bicycling and walking. | **No conflict.** The existing campus is not located within a Transit Priority Area and limited transit opportunities exist within the vicinity. However, the proposed Project would implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site (see Section 3.14 *Transportation*). The TDM plan would include transit and carpool incentives for employees. The proposed Project would provide designated parking for carpools and vanpools on-site. Additionally, the Assisted Living, Memory Care, and PACE services developed under Phase 1 would share vans to transport several participants at once, which would reduce vehicle trips to the campus. The proposed Project would also feature ride-share pick-up amenities (e.g., pick-up/drop-off zones) and designated parking spaces for carpools and vanpools.<br>The proposed Project would also promote active transportation by providing pedestrian linkages through the site and bicycle facilities on-site, which would assist in reducing vehicle trips. For example, the proposed Project would include publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as |

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would also encourage active transportation to and from the Project site.<br>The proposed development and landscaping with the City of Torrance right-of-way would not conflict with Policy LU.4.2 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.4.3.** Require that new development projects provide their full fair share of the improvements necessary to mitigate project generated impacts on the circulation and infrastructure systems. | **No conflict.** As described in Section 3.14, *Transportation* the proposed Project would result in the generation of 376 net new trips per day. The proposed Project – including the development of a pick-up/drop-off zone exit as well as the proposed subterranean service area and loading dock entry/exit within the City of Torrance right-of-way – would not result in any significant operational transportation impacts and therefore, no mitigation measures would be required. The proposed development with the City of Torrance right-of-way would not conflict with LU.4.3 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.5.3**. Maintain and encourage visually attractive residential neighborhoods by preserving and adding street trees and other types of streetscape and hardscape, and by encouraging the use of attractive and appropriate private landscaping. | **No conflict.** Refer to the discussion for Policy LU.2.5 of the Torrance General Plan Land Use Element. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy LU.5.3. of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.9.1.** Preserve, protect, and maintain open space, parks, and recreation facilities as desirable land uses, recognizing that such uses contribute to the high quality of life in Torrance. | **No conflict.** Refer to the discussion for Policy LU.2.5 of the Torrance General Plan Land Use Element. Improvements within the City of Torrance right-of-way would include re-landscaping the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The perimeter of the campus would be planted with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees. Specifically, the eastern border of the campus within the City of Torrance right-of-way would be lined with intermittent large shade canopy trees and smaller shade trees that would be clustered for a natural look (refer to Figure 2-7). The proposed the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane (refer to Section 3.3, *Biological Resources*). Therefore, the proposed development and |

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | landscaping within the City of Torrance right-of-way would not conflict with the Policy LU.9.1 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.11.1.** Encourage development which enhances the visual character, quality, and uniqueness of the City's neighborhoods and districts. | **No conflict.** Refer to the discussion for LU.2.1 and LU.2.3 of the Torrance General Plan Land Use Element. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy LU.3.1 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.11.6.** Encourage site and building design whereby individual projects on separate lots function as unified developments to promote aesthetic and functional cohesiveness, where applicable and within the context of applicable regulations. | **No conflict.** The Project site comprises two distinct parcels: the existing campus, designated by the City of Redondo Beach as P (Public or Institutional) and zoned by the City of Redondo Beach as P-CF (Community Facility), and the vacant Flagler Lot on the northeast corner of the Project site, designated and zoned by the City of Redondo Beach as C-2 (Commercial). The proposed Project would redevelop both parcels – including the areas of the parcels located within the City of Torrance right-of-way along Flagler Lane – as a unified and aesthetically and functionally cohesive campus for the existing and proposed BCHD programs. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy LU.11.6 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| **Policy LU.11.9**. Require that development along the City's boundaries emphasize the qualities and uniqueness of Torrance by using attractive and cohesive design elements and architectural themes. | |
| **Policy LU.11.10.** Encourage site and building design that integrates low-impact development principles. | **No conflict.** Improvements within the City of Torrance right-of-way would be limited to the proposed pick-up/drop-off zone exit as well as the proposed service area and loading dock entry/exit. Additionally, the proposed Project would re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The open space and landscaping within the City of Torrance right-of-way would improve overall permeability and drainage (refer to Section 3.9, *Hydrology and Water Quality*). The proposed development and landscaping with the City of Torrance right-of-way would not conflict with Policy LU.11.10 of the Torrance General Plan Land Use Element and would not cause a significant environmental impact. |
| ***Circulation and Infrastructure Element Policies*** | |
| **Policy CI.3.4.** Encourage the use of regional rail, buses, bicycling, carpools, and vanpools for work trips to relieve regional traffic congestion. | **No conflict.** Refer to the discussion for Policy LU.4.2 and LU.4.3 of the Torrance General Plan Land Use Element. The proposed development and landscaping |

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan (Continued)**

| Policy | Discussion |
|---|---|
| **Policy CI.3.5.** Encourage site and building design that reduces automobile trips and parking space demand. | within the City of Torrance right-of-way would not conflict with Policy CI.3.4 or Policy CI.3.5 of the Torrance General Plan Circulation and Infrastructure Element and would not cause a significant environmental impact. |
| **Policy CI.6.2.** Provide for the consistent use of street trees along all sidewalks, parkways, and property frontages. | **No conflict.** Refer to the discussion for Policy LU.2.5 of the Torrance General Plan Land Use Element. The proposed Project would not conflict with Policy CI.6.2 of the Torrance General Plan Circulation and Infrastructure Element and would not cause a significant environmental impact. |
| **Policy CI.7.8.** Require developers to incorporate facilities for transit and other alternative modes of transportation, such as park-and-ride lots, bus terminals or bus substation, and bus turnouts in the design of major developments. | **No conflict.** Refer to the discussion for Policy LU.4.2 and Policy LU.4.3 of the Torrance General Plan Land Use Element. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy CI.7.8 of the Torrance General Plan Circulation and Infrastructure Element and would not cause a significant environmental impact. |
| **Policy CI.8.1.** Provide and maintain safe, efficient, and convenient pedestrian pathways that offer access to major activity centers, recreation facilities, schools, community facilities, and transit stops. | **No conflict.** The proposed Project would include publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site and off-site connectivity with the existing sidewalks adjacent to the Project site, including a pedestrian connection between the sidewalk along Flagler Lane and the proposed multi-tiered staircase within the vacant Flagler Lot. Publicly accessible pedestrian-only open space on the ground level of the proposed Project would encourage active transportation between the campus and the nearby residences, commercial land uses, and transit stops. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy CI.8.1 and Policy CI.8.2 of the Torrance General Plan Circulation and Infrastructure Element and would not cause a significant environmental impact. |
| **Policy CI.8.2.** Promote walking throughout the community by installing sidewalks where they are missing and making improvements to existing sidewalks when needed for safety purposes. Particular attention will be given to sidewalk improvements near schools and activity centers. | |
| ***Community Resources Element Policies*** | |
| **Policy CR.1.2.** Require the provision of on-site open space in new developments. | **No conflict.** Refer to the discussion for Policy LU.2.5 of the Torrance General Plan Land Use Element. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with these polices of the Torrance General Plan Community Resources Element and would not cause a significant environmental impact. |
| **Policy CR.1.3**. Require that development projects involving modifications or additions include plans to upgrade or add open space and landscaping. | |
| **Policy CR.4.2**. Require that developers and property owners improve their properties by providing landscaping and similar aesthetic treatments along roadways. | |

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan (Continued)**

| Policy | Discussion |
|---|---|
| **Policy CR.4.3.** Encourage planting of new trees, and preserve existing street trees in residential neighborhoods. | |
| **Policy CR.7.4.** Encourage use of City-sponsored transportation, ride-sharing, and the Torrance Transit System by community residents for transportation to local recreational and community facilities. | **No conflict.** The proposed Healthy Living Campus Master Plan is intended to redevelop the existing campus, which is not located within a Transit Priority Area. Nevertheless, the proposed Project would be located in close proximity to several stops along the Beach Cities Transit Line 102. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with not conflict with Policy CR.7.4 of the Torrance General Plan Community Resources Element and would not cause a significant environmental impact. |
| **Policy CR.7.6.** Make Torrance's parks, recreation, and community facilities compliant with the Americans with Disabilities Act (ADA) standards for accessibility to better serve senior and disabled populations. | **No conflict.** The proposed development within the City of Torrance right-of-way would be accessible and navigable by elderly residents and visitors alike as well as the general population. Ground-level pedestrian pathways – including the sidewalk and pathway located within the City of Torrance right-of-way would be gently sloping and designed to comply with the ADA. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy CR.7.6 of the Torrance General Plan Community Resources Element and would not cause a significant environmental impact. |
| **Policy CR.8.2** Maintain, promote, and enhance programs that provide recreational, educational, cultural, and community services for families and residents of all ages. | **No conflict.** Redevelopment of the campus – including the preliminary site development plan under Phase 1 and the development program under Phase 2 –would expand community services and programs available for use by residents of all ages, including children, adults, and senior citizens. The proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy CR.8.2 of the Torrance General Plan Community Resources Element and would not cause a significant environmental impact. |
| **Policy CR.13.5.** Support air quality and energy and resource conservation by encouraging alternative modes of transportation such as walking, bicycling, transit, and carpooling. | **No conflict.** The existing campus is not located within a Transit Priority Area and limited transit opportunities exist within the vicinity. However, the proposed Project would implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site (see Section 3.14 *Transportation*). The TDM plan would include transit and carpool incentives for employees. The proposed Project would provide designated parking for carpools and vanpools on-site. The proposed Project would also feature ride-share pick-up amenities (e.g., pick-up/drop-off zones) and designated parking spaces for carpools and vanpools. |

**Table 3.10-5. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance General Plan (Continued)**

| Policy | Discussion |
|---|---|
| | The proposed Project would also promote active transportation by providing pedestrian linkages through the site and bicycle facilities on-site, which would assist in reducing vehicle trips. For example, the proposed Project would include publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site connectivity with the existing sidewalks adjacent to the Project site. Given the Project site's location adjacent to existing Class II (i.e., striped) bicycle lanes along Diamond Street and Beryl Street, as well as Flagler Alley, which is often used as an informal bicycle path, the proposed on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) would also encourage active transportation to and from the Project site.<br>Therefore, the proposed development and landscaping within the City of Torrance right-of-way would not conflict with Policy 13.5 of the Torrance General Plan Community Resources Element and would not cause a significant environmental impact. |
| **Policy CR.13.8.** Promote energy-efficient building construction and operation practices that reduce emissions and improve air quality. | **No conflict.** All of the proposed buildings constructed within Redondo Beach under the Phase 1 preliminary site development plan and Phase 2 development program would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). Additionally, the proposed buildings would meet the equivalent of LEED Gold Certification and would be WELL Building Certified. Improvements within the City of Torrance right-of-way would be limited to the proposed pick-up/drop-off zone exit as well as the proposed subterranean service area and loading dock entry/exit. Additionally, the proposed Project would re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. As such, the proposed development within the City of Torrance right-of-way would not conflict with these policies of the Torrance General Plan Community Resources Element and would not cause a significant environmental impact. |
| **Policy CR.21.6.** Promote energy-efficient design features, including appropriate site orientation, use of light-colored roofing and building materials, and use of trees to reduce fuel consumption for heating and cooling. | |
| **Policy CR.24.1**. Encourage sustainable construction practices and the use of energy-saving technology. Consider establishing a green building program that draws from the LEED (Leadership in Energy & Environmental Design) standards. | |

*City of Torrance Municipal Code Development Standards*

The City of Torrance right-of-way extends into the existing campus and the vacant Flagler Lot by approximately 26 feet from the edge of the existing paved width of Flagler Lane (refer to Figure

3.10-1 and Figure 3.10-2). TMC Section 92.32.8 guides the use of the public right-of-way and TMC Section 92.30.8 guides access to local streets within Torrance.

These sections of the TMC are relevant to the proposed Project given that the proposed Project would extend into the City of Torrance right-of-way at three locations. The proposed Project includes two access points with driveways along Flagler Lane. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed for a subterranean service area and loading dock entry/exit, which would require grading and construction of retaining walls (refer to Section 2.5.1.3, *Proposed Access, Circulation and Parking*). These elements of the proposed Project would require grading and building permits from the City of Torrance (refer to Section 1.5, *Required Approvals*). The proposed Project would also re-landscape the eastern slope of the campus to be consistent with the landscaping proposed within the remainder of the campus. The proposed grading and landscaping on this portion of the slope would also require a grading permit, landscape plan approval, and site plan review from the City of Torrance (refer to Section 1.5, *Required Approvals*).

## Table 3.10-6. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance Municipal Code

| Policy | Project Consistency |
|---|---|
| ***TMC Section 92.30.8 Use of the Public Right-of-Way*** | |
| With the exception of those items for which a permit may be issued, or for which a legal exception is elsewhere granted in law, it is unlawful for any person owning, occupying or having charge of any property in the City to place or maintain on any sidewalk or public right-of-way abutting or adjoining such property any rubbish or waste material, construction material, play equipment, signs, trash, vegetation, or any object which obstructs or interferes with the free passage, use or view by the public of any sidewalk, street, alley, parkway, beach, or other public right-of-way, or which may impede emergency access. | **No Conflict.** As previously described, improvements within the City of Torrance right-of-way would be limited to the proposed pick-up/drop-off zone exit as well as the proposed subterranean service area and loading dock entry/exit. While these new access points would require two new curb cuts within the sidewalk along Flagler Lane. The proposed development within the City of Torrance right-of-way would not interfere with pedestrian travel along the sidewalk. Further, proposed access points would not interfere with vehicular travel along Flagler Lane (see Section 3.14, *Transportation*). Neither the proposed development nor the proposed landscaping would conflict with TMC Section 92.30.8 and would not cause a significant environmental impact. |
| ***TMC Section 92.30.8 Access to Local Streets Prohibited*** | |
| No vehicular access shall be permitted to a local street from a commercially or industrially zoned through lot which also has frontage on a major or secondary street. In no case shall a commercial or industrial lot be developed in such a manner that traffic from the commercial or industrial uses on it will be channeled onto any residential streets. | **Potential Conflict.** As shown in Figure 3.10-1 and Figure 3.10-2, the vacant Flagler Lot is located at the intersection of Beryl Street & Flagler Lane and zoned as C-2 (Commercial) by the City of Redondo Beach. The proposed one-way driveway and pick-up/drop-off zone would be accessible via a right-turn along eastbound Beryl Street located within Redondo Beach and would exit onto Flagler Lane located within Torrance. As such, the proposed Project may potentially conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. However, the applicability of this policy is unclear given that Beryl Street is located within Redondo Beach and the vacant Flagler Lot has been zoned as C-2 (Commercial) by the City of Redondo Beach. Nevertheless, as described in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation* the development of this proposed driveway would not result in any significant environmental impacts with regarding to air emissions, roadway noise, or geometric roadway hazards. Therefore, while development of the proposed access points the within the City of Torrance right-of-way may potentially conflict with TMC Section 92.30.8, it would not cause a significant environmental impact. |

**Table 3.10-6. Potential for Significant Environmental Effects Resulting from Conflicts of the proposed Project with the Torrance Municipal Code (Continued)**

| Policy | Project Consistency |
|---|---|
| ***TMC Division 7, Chapter 5*** | |
| TMC, Division 7, Chapter 5 comprises the Tree Ordinance, which describes permit requirements to cut, trim, and remove trees (TMC Section 7.5.1), protection of trees during construction (TMC Section 75.1.11), obstruction of views from driveway to street (TMC Section 75.1.14), etc. | **No conflict.** As described in Section 3.3, *Biological Resources*, construction under the Phase 1 preliminary site development plan would require the removal of approximately 20 landscaped trees along Flagler Lane (north of Towers Street). BCHD would apply for a permit from the Public Works Director pursuant to TMC 75.1.5[a]. The proposed tree removal and the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane. Therefore, the proposed landscaping within the City of Torrance right of way would not conflict with TMC Section 92.30.8 and would not cause a significant environmental impact. |
| ***TMC Section 4-46.3.1 Construction of Buildings and Projects*** | |
| a) It shall be unlawful for any person within the City of Torrance to operate power construction tools, equipment, or engage in the performance of any outside construction or repair work on buildings, structures, or projects in or adjacent to a residential area involving the creation of noise beyond 50 decibels (dB) as measured at property lines, except between the hours of 7:30 A.M. to 6:00 P.M. Monday through Friday and 9:00 A.M. to 5:00 P.M. on Saturdays. Construction shall be prohibited on Sundays and Holidays observed by City Hall. An exception exists between the hours of 10:00 A.M. to 4:00 P.M. for homeowners that reside at the property. | **No conflict.** As described in Section 2.5.1.6, *Construction Hours*, BCHD would comply with the construction hours prescribed by the City of Torrance. Therefore, while construction noise level would exceed the FTA significance criteria identified in Section 3.11, *Noise*, the proposed development and landscaping with the City of Torrance right-of-way would not conflict with TMC Section 4-46.3.1. |

Cumulative Impacts

Cumulative land use impacts could occur if other future development projects within the Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach (refer to Tables 3.0-1 through 3.0-4 in Section 3.0, *Cumulative Impacts*) would result in land use impacts in conjunction with the proposed Project.

The City of Redondo Beach is currently preparing a focused update of its General Plan for the following Elements: Land Use; Conservation, Recreation and Parks, and Open Space; Safety; and Noise. The Mayor and Redondo Beach City Council directed the City to perform an update of its General Plan and appointed a broadly representative General Plan Advisory Committee (GPAC). One of the first tasks of the GPAC was to develop a draft Vision Statement to guide the Plan update efforts. The draft Vision Statement, approved by the GPAC in September 2017, sets a long-term

vision for Redondo Beach as a guide for the community character and types of development. The General Plan Update will provide policy direction and guidance to residents, City staff, decision-makers, and the community. The General Plan Update has not yet been released to the public; therefore, this EIR evaluates the proposed Project in relation to Redondo Beach's current General Plan (2009).

The proposed Project, in conjunction with other planned and pending projects within the vicinity of the Project site (refer to Tables 3.0-1 through 3.0-4 in Section 3.0, *Cumulative Impacts*), would increase the number of mixed-use developments by increasing the developed commercial space, number of residential units, and square footage of recreational and open space areas. Any such land use changes in the surrounding cities, however, would be required to comply with SCAG's RTP/SCS and local General Plans, municipal codes, and zoning ordinances, which all have goals of focusing expanding public open space and community vibrancy near transit to preserve the existing neighborhoods and to achieve sustainability goals (refer to Tables 3.10-1 through 3.10-7). The proposed Project is expected to increase the use of public transit and decrease the distance between new housing, jobs, and transportation services, thus reducing net increases in trips, and associated GHG emissions. The proposed Project residential, medical office, office, gym, restaurant, and open space uses would be compatible with the surrounding residential, commercial, and recreational land uses in the Project vicinity. The proposed Project would be consistent with the goals and policies contained within Connect SoCal, Metro's LRTP, South Bay Bicycle Master Plan, the Redondo Beach and Torrance General Plans, and development standards contained in the RBMC and TMC. In addition, all pending and future projects are required to be consistent with Connect SoCal, Metro's LRTP, South Bay Bicycle Master Plan, and the applicable General Plans, Municipal Codes, and Zoning Ordinances. All cumulative commercial, residential, and mixed-use development projects would be required to undergo consistency review of with local land use plans, policies, and regulations to ensure compatibility with surrounding communities. Therefore, the proposed Project, in combination with other pending/future projects, *would not result in or contribute considerably to significant cumulative land use impacts*.

For cumulative impacts that result primarily from development outside of Redondo Beach and Torrance (i.e., Hermosa Beach, Manhattan Beach, Gardena, Carson, Lomita, or Palos Verdes Estates), it should be noted that the City of Redondo Beach and the City Torrance cannot control land use policies or decisions outside of their boundaries; however, regional planning guidance provided by SCAG encourages municipalities to promote growth that would limit and reduce potential cumulative impacts, particularly related to transportation and transportation-related air pollutant emissions.

## 3.11 NOISE

This section of the Environmental Impact Report (EIR) evaluates the potential noise and vibration impacts from the construction and operation of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) – including the Phase 1 preliminary site development plan and the more general Phase 2 development program. Information for this section was developed based on a review of current noise and vibration standards and assessment methodologies, including the Redondo Beach Noise Regulations (Redondo Beach Municipal Code [RBMC] Section 4-24), Redondo Beach General Plan Noise Element, Torrance Noise Regulations (Torrance Municipal Code [TMC] Section 6-46), Torrance General Plan Noise Element, Federal Highway Administration (FHWA) Traffic Noise Model, FHWA Roadway Construction Noise Model, and others contained in the Federal Transit Administration's (FTA's) Transit Noise and Impact Assessment Manual (FTA 2018).

### 3.11.1 Fundamentals of Sound and Environmental Noise

Noise

Noise is typically defined as unwanted sound that interferes with normal activities or otherwise diminishes the quality of the human or natural environment. Prolonged exposure to high levels of noise is known to have several adverse effects on people, including hearing loss, communication interference, sleep interference, physiological responses, and annoyance (Federal Interagency Committee on Urban Noise [FICUN] 1980). The ambient noise environment typically includes background noise generated from both near and distant noise sources. These can vary from an occasional aircraft overhead or an occasional train passing by to continuous noise from sources such as consistent vehicle traffic along a major road and/or pedestrian activity within open space recreational areas or other places where people congregate.

Sound is technically described in terms of the loudness (i.e., amplitude) and frequency (i.e., pitch) of the sound. The standard unit of measurement of the loudness of sound is the decibel (dB). Sound frequency is measured in terms of hertz (hz), and the normal human ear can detect sounds ranging from about 20 to 15,000 hz. All sounds in the wide range of frequencies are not heard equally well by the human ear, which is most sensitive to frequencies in the 1,000 to 4,000 hz range. Since the human ear is not equally sensitive to sound at all frequencies (i.e., between 1,000 and 8,000 cycles per second), a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) adjusts very high and very low frequencies to approximate the human ear's lower sensitivity to those frequencies since. Decibels are based on a logarithmic scale, which compresses the wide range in sound pressure levels to a more useable

range of numbers. This is called "A-weighting" and is commonly used in the measurement of ambient community environmental noise. Unless otherwise noted, all dB measurements presented in the following noise analysis are dBA.

In terms of human response to noise, a 3-dBA increase is barely perceptible to most people, a 5-dBA increase is readily noticeable, and a 10-dBA increase would be perceived as a doubling of loudness (100 percent increase) (FICUN 1980; FTA 2018). Examples of various sound levels in different environments are shown in Table 3.11-1.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates, these scales consider the effect of noise upon people largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Each noise rating scale applicable to this analysis is defined as follows:

- **Equivalent Continuous Noise Level ($L_{eq}$)** is the average acoustic energy of noise for a given period. Thus, the $L_{eq}$ of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. This rating scale does not "weight" or "penalize" noise, depending on whether it occurs during the day or the night.
- **Community Noise Equivalent Level (CNEL)** is a 24-hour average $L_{eq}$ with a 5-dBA "weighting" or "penalty" during the hours of 7:00 p.m. to 10:00 p.m. and a 10-dBA "weighting" or "penalty" a during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour $L_{eq}$ would result in a measurement of 66.7 dBA CNEL. CNEL is often used due to its utility in identifying noise related sleep disturbance effects, often a key community concern for increases in noise levels. This metric is typically used within the State of California for noise analyses and CEQA-compliant documents.
- **Day-Night Average Noise Level ($L_{dn}$)** is a 24-hour average $L_{eq}$ with a 10 dBA "weighting" or "penalty" during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour $L_{eq}$ would result in a measurement of 66.4 dBA $L_{dn}$. This metric is typically used by Federal agencies (e.g., Federal Aviation Administration [FAA]) for noise analyses and National Environmental Policy Act (NEPA) compliant environmental documentation.
- **Minimum Instantaneous Noise Level ($L_{min}$)** is the minimum instantaneous noise level experienced during a given period.
- **Maximum Instantaneous Noise Level ($L_{max}$)** is the maximum instantaneous noise level experienced during a given period.

## Table 3.11-1. Representative Noise Levels

| Common Outdoor Activities | Noise Level (dBA) | Common Indoor Activities |
|---|---|---|
| Power saw | —110— | Rock band |
| Jet fly-over at 100 feet | | Crying baby |
| Subway | —100— | |
| Gas lawnmower at 3 feet | | |
| Rail transit horn / tractor | —90— | |
| Jack hammer | | Food blender at 3 feet |
| Rail transit at-grade (50 miles per hour [mph]) | —80— | Garbage disposal at 3 feet |
| Noisy urban area during daytime | | |
| Gas lawnmower at 100 feet | —70— | Vacuum cleaner at 10 feet |
| Rail transit in station / commercial area | | Normal speech at 3 feet |
| Heavy traffic at 300 feet | —60— | Sewing machine |
| Air conditioner | | Large business office |
| Quiet urban area during daytime | —50— | Dishwasher in next room |
| | | Refrigerator |
| Quiet urban area during nighttime | —40— | Theater, large conference room (background) |
| Quiet suburban area during nighttime | | |
| | —30— | Library |
| Quiet rural area during nighttime | | Bedroom at night, concert hall (background) |
| | —20— | |
| | | Broadcast / recording studio |
| | —10— | |
| | | |
| Lowest threshold of human hearing | —0— | Lowest threshold of human hearing |

Source: California Department of Transportation (Caltrans) ~~1998~~2013.

Noise levels from a source attenuate (i.e., decline) as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding by buildings or other structures, may intensify or reduce the noise level at a location. A common method for estimating roadway noise is that for every doubling of distance from the source, the noise level is reduced by approximately 3 dBA at acoustically *"hard"* locations (i.e., mostly asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically *"soft"* locations (i.e., exposed soil or landscaping, such as grass).

Noise from stationary sources – including construction-related noise – is reduced by approximately 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings

between the receptor and the noise source reduces the noise level by approximately 5 dBA, while a solid wall or berm can reduce noise levels by up to 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior noise reduction of newer residential units is generally 30 dBA or more (FTA 2018).

Vibration

Vibration is sound radiated through the ground. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment and traffic on rough roads. If a road is smooth (e.g., newly constructed or newly re-paved), the ground-borne vibration from traffic is rarely perceptible. The vibration of floors and walls may cause perceptible vibration, rattling of items such as windows or dishes on shelves, or a rumble noise. The rumble is the noise radiated from the motion of the room surfaces. In essence, the room surfaces act like an amplifier causing what is called *"ground-borne noise."* Ground-borne vibration rarely disturbs people in outdoor settings. Although the motion of the ground may be perceived, without the effects associated with the shaking of a building, the motion does not provoke the same adverse human reaction. In addition, the rumble noise that usually accompanies the building vibration is perceptible only inside buildings. Typically, ground-borne vibration generated by manmade activities attenuates rapidly with distance from the source of the vibration. Man-made vibration issues are therefore usually confined to short distances from the source.

*Service vehicles, such as delivery trucks and garbage trucks can generate ground-borne vibration in the vicinity of the Project site.*

The ground motion caused by vibration can be measured as peak particle velocity (ppv) in inches per second (in/sec) (FTA 2018; Caltrans ~~2013~~2020). The vibration level at which continuous or frequent vibration is strongly perceptible is 0.1 in/sec. For transient ground-borne vibration (i.e., a single isolated vibration event), 0.035 in/sec is barely perceptible while 2.0 in/sec is felt severely (Caltrans ~~2013~~2020). Potential structural damage from ground-borne vibration, whether transient or continuous, is rare. The thresholds for potential structural damage to fragile buildings from

transient or continuous vibration events are 0.2 in/sec and 0.1 in/sec, respectively. New residential structures are less likely to have structural damage from transient or continuous vibration events which corresponds to threshold criteria of 2.0 in/sec and 0.5 in/sec, respectively.

### 3.11.2 Environmental Setting

Land uses within Redondo Beach and Torrance include a range of residential, commercial, institutional, and recreational open space areas that are common to urbanized coastal areas in Southern California (refer to Section 3.10, *Land Use and Planning*). The Project site is located along the border of Redondo Beach and Torrance, which includes primarily single-family and multi-family residential development as well as some neighborhood-serving commercial retail, restaurants, and fitness studios. Noise sources associated with these uses include, but are not limited to, the following: exposed mechanical equipment (e.g., heating, ventilation, and cooling [HVAC] equipment, elevator shafts, etc.); delivery, loading, and garbage truck operations; and other minor noise sources associated with restaurant, retail, and residential uses (e.g., amplified music, talking, etc.).

The ambient noise environment in the vicinity of the Project site is typical of an urban area, influenced by a variety of human-caused sources of noise typical for urban areas, most notably vehicular traffic on local roadways, along with occasional aircraft overflights, and activities associated with commercial businesses. The primary source of noise in the vicinity of the Project site is vehicle traffic, including passenger vehicles, buses, motorcycles, and trucks. Traffic noise is primarily generated on nearby arterial streets such as North Prospect Avenue and Beryl Street. Pacific Coast Highway (PCH) and 190$^{th}$ Street are additional sources of vehicle noise and are located to the west and north of the Project site, respectively. The high volume of daily vehicle trips along PCH is a large source of vehicle noise; however, PCH is located approximately 0.5 miles from the Project site, with many residential homes and other development acting as sound barriers, which contain the noise generated and limit the area affected by this noise source.

Towers Elementary School and Beryl Heights Elementary School are located 350 feet and 905 feet from the Project site, respectively. Noise associated with schools includes bells (e.g., attendance and dismissal), children's voices from recess/outdoor play areas, and vehicular traffic during student pick-up and drop-off times.

*Noise sources along Beryl Street include the Redondo Village Shopping Center, Dominguez Park, and Towers Elementary School (left). The outdoor play area associated with Beryl Heights Elementary School (right) generates noise along Maria Avenue, which is three streets west of the Project site.*

Additionally, construction projects in Redondo Beach and Torrance also generate construction noise, particularly during weekdays between the standard construction hours identified in Redondo Beach Noise Regulations (RBMC Section 4-24) and Torrance Noise Regulations (TMC Section 6-46). For example, recently completed construction along Flagler Lane from Beryl Street to 190th Street to the north of the Project site contributed to the ambient noise environment in the immediate vicinity of the Project site. (For a complete list of cumulative projects in the cities, refer to Tables 3.0-1, 3.0-2, 3.0-3, and 3.0-4.)

The Project site is bounded by North Prospect Avenue to the west and south, the Redondo Village Shopping Center and Beryl Street to the north, and Flagler Lane, Flagler Alley, and Diamond Street to the east. The Project site fronts two busy streets in Redondo Beach, North Prospect Avenue, and Beryl Street. North Prospect Avenue between Anita Street and PCH is identified in the Redondo Beach General Plan Noise Element as a major street with peak period noise exposure levels between 71 and 75 dBA and generating ambient $L_{dn}$ noise levels ranging between 66 and 70 dBA. As such, North Prospect Avenue adjacent to the Project site is identified in the Redondo Beach General Plan Noise Element as a single-family residential area that exceeds State exterior noise guidelines established in Land Use Compatibility for Community Noise Environments (see Section 3.11.3, *Regulatory Setting*). Beryl Street and Diamond Street were identified as generating ambient $L_{dn}$ noise levels ranging between 60 and 65 dBA (City of Redondo Beach 2008b).

The single-family residential neighborhood located immediately east of the Project site within West Torrance is subject to an average ambient noise level of 60 dBA CNEL, according to the Torrance General Plan Noise Element (City of Torrance 2010).

Bus service in the vicinity (within 0.5 miles) of the Project site is provided by Beach Cities Transit Line 102 (see Section 3.14, *Transportation*). The northbound line has three bus stops adjacent to

the Project site: one stop at the campus's southern secondary vehicle entrance (approximately 100 feet north of the North Prospect Avenue & Diamond Street intersection), and two stops along the southern side of Beryl Street, at the Shell gas station and just west of Flagler Lot. The southbound line has two bus stops adjacent to the Project site: one bus stop along the western side of North Prospect Avenue across the street of the campus's main entrance, and one stop along the northern side of Beryl Street across from Flagler Lot. The buses along this transit line are a source of traffic noise.

Redondo Beach Fire Department (RBFD) records indicate that a total of 451 emergency medical service (EMS) calls were dispatched to the Beach Cities Health Center between January 2015 and July 2019, with an average of 98 calls per year and 8 calls per month (see Table 3.11-2).

**Table 3.11-2. EMS Calls for the BCHD Campus (2015-2019)**

| Period | EMS Calls Per Year | Average EMS Calls Per Month |
|---|---|---|
| 2019 (January – July) | 53 | 7.6 |
| 2018 (January – December) | 102 | 8.5 |
| 2017 (January – December) | 101 | 8.4 |
| 2016 (January – December) | 92 | 7.7 |
| 2015 (January – December) | 103 | 8.6 |
| Average | 98 | 8.2 |

Notes: Refer to Section 3.13, *Public Services* for additional details regarding EMS calls to the campus.
Source: RBFD 2019.

During incident responses, the typical practice for emergency vehicles is to break traffic at intersections and use sirens – at the discretion of the driver – to warn other drivers of the emergency vehicle approach when traffic is congested. However, emergency vehicles typically do not engage sirens unless necessary along congested roadways or congested intersections. Responses to nighttime emergency calls can routinely occur without the use of sirens due to the limited nighttime traffic. Approximately 13 percent of the 451 EMS calls dispatched to the Beach Cities Health Center between January 2015 and July 2019 were nighttime (i.e., between 10:00 p.m. and 7:00 a.m.) calls. When sirens are necessary for an emergency response, they typically emit noise at a magnitude of approximately 100 dBA at 100 feet. A decrease of about 3 dBA occurs with every doubling of distance from a mobile noise source; therefore, during a response requiring sirens, residences along North Prospect Avenue and Beryl Street experience peak short-duration exterior noise levels ranging from 91 to 100 d.11BA. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic.

The primary source of noise within the Project site is from the parking areas on-site, which are surface parking lots along the boundaries of the campus, the subterranean parking garage that fronts 520 North Prospect Avenue, and the above ground parking structure located at 512 North Prospect Avenue. Noise from the parking areas generally consists of sporadic noises from vehicles arriving and departing, tire squeals, car alarms, opening and closing of car doors, and people's voices. Variation in sound levels depends on factors such as the number of vehicles moving though the structure at any given time (e.g., weekday versus weekend), and the unpredictable nature of noise sources (e.g., car alarms). Additionally, many of the existing structures on the Project site have HVAC systems, which generate a continuous low humming noise. Natural sources of sound (e.g., wind blowing through trees and vegetation and birds) also contribute to the ambient noise environment in the vicinity of the Project site.

*The campus includes five buildings as well as surface parking lots, a subterranean parking garage, and an above ground parking garage, which generate vehicle-related noise.*

To identify representative noise levels around the Project site, daytime noise measurements were taken at seven locations including the streets on all sides of the Project site (i.e., North Prospect Avenue, Beryl Street, Flagler Lane, Flagler Alley, and Diamond Street) and along the proposed construction haul routes (i.e., 190$^{th}$ Street and Del Amo Boulevard) (see Figure 3.11-1). Noise levels were measured using a Quest Technologies 2200 Type I Integrating Sound Level Meter, which satisfies the American National Standards Institute (ANSI) Specifications for Integrating-Averaging Sound Level Meters for use in general environmental noise measurement. Measurements were taken during 10-minute intervals between 7:00 a.m. and 9:00 a.m. AM peak period and between 4:00 p.m. and 6:00 p.m. PM peak period (see Table 3.11-3).

**Table 3.11-3. Existing Noise Levels Measured in the Project Vicinity (dBA)**

| | | North Prospect Avenue | Diamond Street | Flagler Alley | Flagler Lane | Beryl Street | Mildred Avenue | Del Amo Blvd | 190th Street |
|---|---|---|---|---|---|---|---|---|---|
| | | Site 1 | Site 2 | Site 3 | Site 4 | Site 5 | Site 6 | Site 7 | Site 8 |
| AM Peak | $L_{eq}$ | 64.3 | 56.7 | 47.1 | 59.3 | 66.6 | 58.9 | 69.9 | 70.2 |
| | $L_{max}$ | 77.1 | 66.2 | 56.2 | 72.3 | 82.1 | 69.1 | 80.5 | 79.6 |
| | $L_{min}$ | 47.8 | 44.8 | 43.4 | 53.2 | 52.6 | 43.3 | 49.6 | 47.9 |
| PM Peak | $L_{eq}$ | 68.8 | 55.3 | 49.4 | 61.5 | 64.2 | 53.0 | 70.4 | 71.5 |
| | $L_{max}$ | 85.2 | 64.6 | 65.9 | 72.7 | 76.4 | 66.3 | 82.3 | 85.7 |
| | $L_{min}$ | 49.8 | 46.8 | 44.2 | 54.8 | 51.6 | 42.6 | 48.9 | 47.3 |

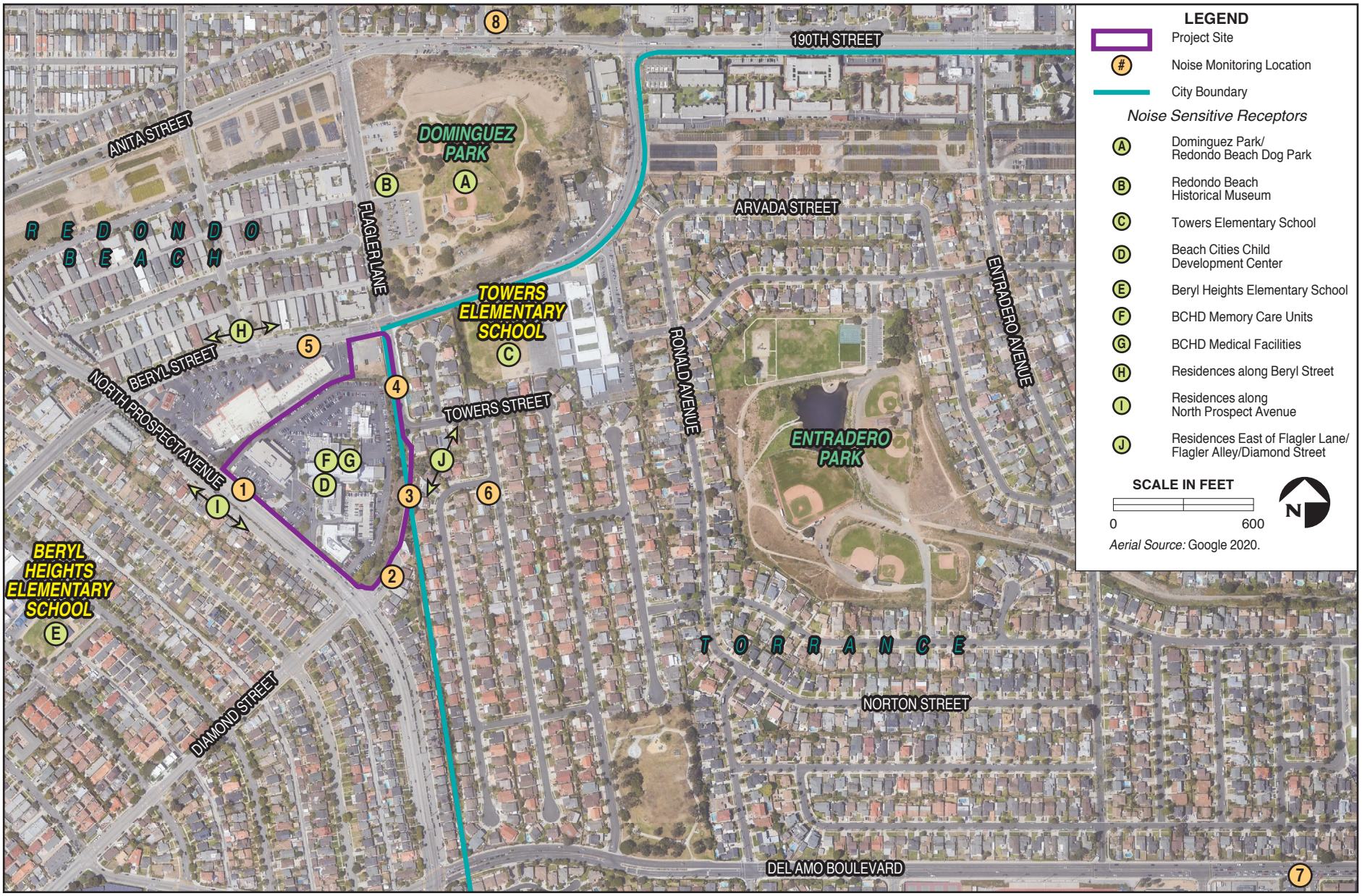
Notes: See Appendix I for noise monitoring results.

The highest measured noise levels were recorded along Del Amo Boulevard and 190th Street (Sites 7 and 8), with maximum sound levels during the AM and PM peak periods of 82.3 dBA and 85.7 dBA, respectively. Flagler Alley and Mildred Avenue (Sites 3 and 6) generally have lower noise levels, with maximum noise levels during the AM and PM peak periods of 65.9 dBA and 69.1 dBA, respectively. These noise levels are characteristic of a high-activity suburban area. Existing daytime noise levels were calculated using the data collected during noise monitoring as well as the highest recorded traffic volumes on the surrounding roadways to provide the most conservative value for ambient $L_{eq}$ noise levels and presented in Table 3.11-4. Thus, the ambient noise levels are also reflective of roadway traffic noise.

**Table 3.11-4. Daytime and 24-hour Average Noise Levels in the Project Vicinity**

| Street | Daytime Noise Level | | | | 24-hour Average Noise Level[1,2] ($L_{dn}$) |
|---|---|---|---|---|---|
| | AM Peak Period ($L_{eq}$ 1-hour) | Mid-day[1] ($L_{eq}$ 1-hour) | PM Peak Period ($L_{eq}$ 1-hour) | Ambient ($L_{eq}$ 15-hour) | |
| Beryl Street | 67 | 64 | 64 | 64 | 63 |
| Diamond Street | 57 | 54 | 55 | 54 | 53 |
| Flagler Lane | 59 | 59 | 62 | 59 | 58 |
| Flagler Alley | 47 | 46 | 49 | 46 | 45 |
| North Prospect Avenue | 64 | 66 | 69 | 66 | 65 |

Notes:
[1]Assumed daytime non-peak period traffic noise level was 3 dBA less than highest peak period traffic noise level (a 50 percent reduction in non-peak period traffic).
[2]Assumed nighttime noise level was 5 dBA less than daytime non-peak period traffic noise level consistent with the Redondo Beach Permissible Noise Levels as presented in Table 3.11-9.




wood.

**Noise Monitoring Locations and Sensitive Receptors**

**FIGURE 3.11-1**

Noise and Vibration Sensitive Receptors

The Redondo Beach General Plan Noise Element defines noise-sensitive uses as schools, libraries, health care facilities, and residential uses. Land uses identified by the Torrance General Plan Noise Element (2010) as noise-sensitive land uses include schools, hospitals, churches, and residential neighborhoods. Other noise-sensitive may include museums, libraries, and parks. Noise-sensitive land uses near to the Project site are shown in Figure 3.11-1 and are listed in Table 3.11-5.

*Noise sensitive land uses in the vicinity of the Project site include the residential buildings adjacent to the Project site across North Prospect Avenue, Beryl Street (left), Flagler Lane, Flagler Alley, and Diamond Street. Dominguez Park (right) is a public park located across Beryl Street and Flagler Lane from the Project site.*

The nearest schools to the Project site are the Beach Cities Child Development Center (located on-site), Towers Elementary School, and Beryl Heights Elementary School (see Table 3.11-5). Other schools located greater than 1,000 feet from the Project site include Redondo Shores High School, Redondo Beach Learning Academy, Redondo Union High School, Jefferson Elementary School, Parras Middle School, Our Lady of Guadalupe School, Valor Christian Academy, and West High School.

The nearest recreational space to the Project site is Dominguez Park, which is located immediately northeast across the intersection of Beryl Street & Flagler Lane (see Table 3.11-5). Other recreational areas in the vicinity of the Project site, but located greater than 1,000 feet from the BCHD campus include Sunnyglen Park, Entradero Park, Perry Allison Playfield, Sea Hawk Stadium, Moondust Parkette, and Edith Rodaway Friendship Park.

**Table 3.11-5. Noise-Sensitive Land Uses within 1,000 Feet of the Project Site**

| Sensitive Receptor | Address | Distance and Direction | Use |
|---|---|---|---|
| Beach Cities Child Development Center | 514 North Prospect Avenue, Redondo Beach | On the Project site | Preschool |
| Silverado Beach Cities Memory Care Community | 514 North Prospect Avenue, Redondo Beach | On the Project site | 60 Memory Care residential units for patients with Alzheimer's or other type of dementia |
| Outpatient Medical Facilities | 510, 514, and 520 North Prospect Avenue, Redondo Beach | On the Project site | Outpatient medical facility |
| Residences east of Flagler Lane/Flagler Alley/Diamond Street | Flagler Lane/Flagler Alley/Diamond Street | 80 feet East | Single-family residences |
| Residences along Beryl Street | Beryl Street | 80 feet North | Multi-family residences |
| Residences along North Prospect Avenue | North Prospect Avenue | 110 feet South and West | Single-family residences |
| Dominguez Park/Redondo Beach Dog Park | 200 Flagler Lane, Redondo Beach | 112 feet Northeast | Public park with a little league field, play structures, and a dog park |
| Towers Elementary School | 5600 Towers St, Torrance | 350 feet East | Elementary school |
| Morrell House and Queen Anne House at Dominguez Park | 302 Flagler Lane, Redondo Beach | 600 feet North | Historic houses showcasing local memorabilia |
| Beryl Heights Elementary School | 920 Beryl St, Redondo Beach | 905 feet West | Elementary school |

Vibration senstive land uses are affected by construction activity in the cities as well as traffic and transportation vehicles, especially heavy-duty vehicles (e.g., delivery trucks) on local roadways. Vibration sensitive land uses, including historic buildings, are typically more structurally fragile due to older building materials and techniques. The vibration sensitive land uses nearest to the Project site are the locally designated landmarks shown in Figure 3.11-1 and are listed in Table 3.11-6 (refer also to Section 3.4, *Cultural Resources and Tribal Cultural Resources*).

**Table 3.11-6. Vibration Sensitive Structures within 1,000 Feet of the Project Site**

| Sensitive Receptor | Address | Distance and Direction | Use |
|---|---|---|---|
| Morrell House and Queen Anne House at Dominguez Park | 302 Flagler Lane, Redondo Beach | 600 feet North | Historic houses showcasing local memorabilia |

### 3.11.3 Regulatory Setting

Various standards have been developed to address the compatibility of land uses and noise levels. The applicable standards are presented in the following discussion. Special emphasis is placed on land uses that are noise sensitive.

Federal Regulations

No Federal noise requirements or regulations apply to local actions of Redondo Beach and Torrance. However, Federal regulations influence the audible landscape where Federal funding is involved. For example, FHWA requires abatement of highway traffic noise for highway projects through rules in Title 23 of the Code of Federal Regulations (CFR) Part 772.

State Policies and Regulations

*California Air Resources Board Anti-Idling Measure*

In 2004, the California Air Resource Board (CARB) adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling (Title 13 of the California Code of Regulations [CCR] Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at a time at a location, thereby minimizing vehicle noise from idling vehicles (refer to Section 3.2, *Air Quality*).

*Title 24 of the California Building Standards Code*

Title 24 of the CCR includes Sound Transmission Control requirements that establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family units. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new dwellings. As established in the State of California Department of Health and Safety's Land Use Compatibility for Community Noise Environments, the highest recommended *"normally acceptable"* exterior noise level exposure is 60 dBA CNEL for single-family residential and 65 dBA CNEL for multi-family residential. The highest recommended *"normally acceptable"* exterior noise level exposure is 70 dBA CNEL for commercial, institutional, and public/government uses. Where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL, the standards require an acoustical analysis demonstrating how dwelling units have been designed to meet the interior standard. Dwellings are to be designed so

that interior noise levels would meet this standard for at least 10 years from the time of a building permit application.

*California Department of Transportation*

The Caltrans Transportation and Construction Vibration Guidance Manual provides guidance and procedures that *"should be treated as screening tools for assessing the potential for adverse vibration effects related to human perception, structural damage, and equipment. This document is not an official policy, standard, specification, or regulation, and should not be used as such"* (Caltrans ~~2013~~2020).

The Caltrans vibration criteria for assessing structural damage and human perception are shown in Table 3.11-7 and Table 3.11-8, respectively.

**Table 3.11-7. Caltrans Vibration Structural Damage Potential Criteria**

| Structure and Condition | Transient Sources (Maximum PPV [in/sec]) | Continuous/Frequent Intermittent Sources (Maximum PPV [in/sec]) |
|---|---|---|
| Extremely fragile historic buildings, ruins, and monuments | 0.12 | 0.08 |
| Fragile buildings | 0.2 | 0.1 |
| Historic and some old buildings | 0.5 | 0.25 |
| Older residential structures | 0.5 | 0.3 |
| New residential structures | 1.0 | 0.5 |
| Modern industrial/commercial buildings | 2.0 | 0.5 |

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: Caltrans ~~2013~~2020.

**Table 3.11-8. Caltrans Vibration Perception Potential Criteria**

| Level of Perceptibility | Transient Sources (Maximum PPV [in/sec]) | Continuous/Frequent Intermittent Sources (Maximum PPV [in/sec]) |
|---|---|---|
| Barely perceptible | 0.04 | 0.01 |
| Distinctly perceptible | 0.25 | 0.04 |
| Strongly perceptible | 0.9 | 0.10 |
| Severe | 2.0 | 0.4 |

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: Caltrans ~~2013~~2020.

Regional Policies and Regulations

*Los Angeles County Code – Vibration Standards*

Redondo Beach and Torrance have no vibration regulations; however, vibration is addressed in Chapter 12.08 of the County of Los Angeles Code. This chapter prohibits the operating of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet from the source if on a public space or right-of-way. The perception threshold is defined as a motion velocity of 0.01 in/sec over the range of 1 to 100 Hz.

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Noise Element*

The Redondo Beach General Plan Noise Element establishes acceptable noise levels for various land uses, with emphasis on requirements for residential areas and other sensitive noise receptors, such as hospitals and schools. In addition, the Noise Element provides guidelines for determining project impacts and CNEL guidelines for noise/land use compatibility. The Noise Element contains the following goals and policies that are applicable to the proposed Project:

Objective 10.3: Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, and visitors of the community.

Policy 10.3.2 Implement requirements under Title 24 of the California Building Code to ensure that interior noise levels attributable to exterior sources shall not exceed an $L_{dn}$ of 45 dBA in any habitable room within new hotels, motels, dormitories, long-term care facilities,

apartment houses, and dwellings other than detached single-family units.

Policy 10.3.4 Prohibit the development of new industrial, commercial, or related land uses or the expansion of existing land uses when it can be demonstrated that such new or expanded land uses would be directly responsible for causing overall (ambient) noise levels to exceed an $L_{dn}$ of 65 dBA exterior upon areas containing housing, schools, health care facilities, or other "noise-sensitive" land uses (as determined by the City of Redondo Beach).

Policy 10.3.5 Encourage "noise sensitive" land uses, including schools, libraries, health care, facilities, and residential uses, to incorporate fences, walls, landscaping, and/or other noise buffers and barriers, where appropriate and feasible to do so.

Objective 10.4: Minimize the adverse impacts of traffic-generated noise on residential and other *"noise sensitive"* uses.

Policy 10.4.1 Require that all new non-residential development design and configure on-site ingress and egress points to divert traffic (and its resultant noise) away from *"noise sensitive"* land uses to the greatest degree practicable, and consistent with applicable safety and planning considerations.

Objective 10.5: Minimize noise spillover or encroachment from commercial and industrial uses into adjoining residential neighborhoods or "noise-sensitive" uses.

Policy 10.5.1 Require that loading and shipping facilities for commercial and industrial land uses abutting residential parcels be located and designed in a manner to minimize the potential noise impacts upon these parcels to the greatest degree practicable.

Policy 10.5.2 Require that all parking areas for commercial and industrial land uses abutting residential areas be buffered and shielded by walls, fences, or adequate landscaping.

Policy 10.5.3 Require that all parking structures serving commercial and industrial land uses be designed to minimize the potential noise impacts of vehicles using these facilities both onsite and on adjacent land uses or properties. The design measures used may include: 1) the use of

materials which mitigate sound transmission; or 2) the configuration of interior spaces to minimize sound amplification and transmission.

Policy 10.5.5 Require that the hours of truck deliveries to commercial or industrial land uses abutting residential uses be limited (within a reasonable period) unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at other hours to the extent consistent with the adopted County of Los Angeles Congestion Management Plan (CMP), or other applicable County, State, or Federal requirements relative to this subject.

Objective 10.6: Minimize the potentially adverse noise impacts associated with the development of mixed-use structures where residential units are located above ground floor commercial uses (where permitted).

Policy 10.6.1 Ensure that mixed-use building are constructed to prevent adverse noise transmission between differing uses or tenants located in the same structures.

Policy 10.6.2 Require that mixed-use structures designed for commercial and residential land uses minimize to the greatest degree practicable (through design and construction techniques or other such technological means as may become available) the transfer or transmission of noise and vibration from the commercial land use to the residential land use.

Objective 10.7: Minimize the impacts of construction noise on adjacent uses.

Policy 10.7.1 Ensure that the prohibitions relative to legal hours of operation for construction activities contained within the existing City of Redondo Beach Noise Ordinance and/or any future/revised Noise Ordinance be adhered to and enforced.

Policy 10.7.2 Require that construction activities adjacent to residential land uses and dwelling units be regulated, as necessary, to prevent the generation of adverse and/or excessive noise impacts.

Policy 10.7.3 Require that construction activities employ feasible and practical techniques and practices which minimize the generation of adverse and/or excessive noise impacts on adjacent land uses.

Objective 10.8: Ensure that buildings are constructed soundly to prevent adverse noise transmission between differing uses or tenants located in the same commercial structure and individual dwelling units in multi-family residential structures.

Policy 10.8.1 Enforce the applicable provisions of the Uniform Building Code (UBC) and City of Redondo Beach Municipal Code which prevent the transmission of excessive and unacceptable noise levels between individual tenants and businesses in commercial structures and between individual dwelling units in multi-family residential structures.

*Redondo Beach Municipal Code*

The RBMC, under Title 4 Chapter 24, Noise Regulation (effective August 11, 1976), provides the local government ordinance relative to community noise level exposure, guidelines, and regulations. The ordinance establishes local noise limits by setting out a series of permissible exterior sound levels by land use categories (for sensitive receptors only). These limits differ between daytime hours (7:00 a.m. to 10:00 p.m.) and nighttime hours (10:00 p.m. to 7:00 a.m.), with the nighttime being more restrictive. The RBMC states that *"no person ~~may~~ shall operate, or cause to be operated, any source of sound at any location within the City or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level when measured on any other property to exceed"* the assigned noise levels for the various land use categories shown in Table 3.11-9 (RBMC Section ~~3~~4-24.301 and 4.24.401). Where the land use borders another land use category, the lower land use category limit is increased by 5 dBA. However, where actual ambient noise levels exceed the presumed ambient noise levels in the RBMC, the allowable noise exposure standard shall be increased in 5 dBA increments as appropriate to encompass or reflect such ambient noise level. For these regulations, Redondo Beach uses the $L_{eq}$ metric based upon the Noise Element (Table 50). These levels are not applicable to motor vehicles operation on public rights-of-way (RBMC Section 4-24.693) and are not applicable to construction noise levels, which are regulated exclusively by hour of operation limitations contained in RBMC Section 4-24.503.

For operational interior noise, RBMC Section 4-24.401 states that the allowable interior noise level for residential, school, and hospital properties is 40 dBA from 10:00 p.m. to 7:00 a.m. and 45 dBA from 7:00 a.m. to 10:00 p.m. Again, these limits are not applicable to construction noise.

However, Redondo Beach Noise Regulations do limit construction activities to the hours between 7:00 a.m. and 6:00 p.m., Monday through Friday, and the hours between 9:00 a.m. and 5:00 p.m. on Saturday. No construction activity is permitted to occur on Sundays or holidays (RBMC Sections 4-24.503 and 9-1.12).

**Table 3.11-9. Redondo Beach Permissible Sound Levels**

| Land Use Type | Time Period | Permissible Ambient Level ($L_{eq}$) |
|---|---|---|
| ***Exterior*** | | |
| Low Density Residential (R-1-A, R-1, R-2, P-D-R, P-U-D, Overlay) | 7:00 a.m. – 10:00 p.m. | 50 |
| | 10:00 p.m. – 7:00 a.m. | 45 |
| Medium Density Residential (R-3, R-4, P-D-R, P-U-D, Overlay) | 7:00 a.m. – 10:00 p.m. | 55 |
| | 10:00 p.m. – 7:00 a.m. | 50 |
| High Density Residential (R-5, R-6, P-D-R, P-U-D, Overlay) | 7:00 a.m. – 10:00 p.m. | 60 |
| | 10:00 p.m. – 7:00 a.m. | 55 |
| Commercial/Industrial (NSC, CSC, GC, P-D-C, P-D-I) | 7:00 a.m. – 10:00 p.m. | 65 |
| | 10:00 p.m. – 7:00 a.m. | 60 |
| Industrial (P-I) | 7:00 a.m. – 10:00 p.m. | 70 |
| | 10:00 p.m. – 7:00 a.m. | 70 |
| ***Interior*** | | |
| Residential, Schools, Hospitals | 7:00 a.m. – 10:00 p.m. | 45 |
| | 10:00 p.m. – 7:00 a.m. | 40 |

City of Torrance Local Policies and Regulations

*Torrance General Plan Noise Element*

The Torrance General Plan Noise Element addresses the issue of noise by identifying sources of noise in the City and providing goals, policies, and programs that ensure that noise from various sources does not create an unacceptable noise environment. The Noise Element establishes policies to guard against creation of new noise/land use conflicts and to minimize the impact of existing noise sources on the community.

The Noise Element's Table N-3, Torrance Noise/Land Use Compatibility Guidelines, specifies exterior and interior noise standards by proposed land use type and proposed density or intensity (see Table 3.11-10). The purpose of the Noise and Land Use Compatibility Guidelines is to serve as guidance criteria for new development to ensure a given land use is compatible with the ambient noise level.

As stated in the Noise Element,

> *"These compatibility criteria serve as guidelines. For example, an acoustical analysis must be prepared when noise-sensitive land uses are proposed within noise impact areas. The analysis must show that the project is designed to attenuate noise to meet the City's noise standards in order to receive approval. If the project design does not meet the noise standards, mitigation can be recommended in the analysis. If the analysis demonstrates that the noise standards can be met by implementing the mitigation measures, the project can be approved conditioned upon implementation of the mitigation measures."*

**Table 3.11-10. City of Torrance Permissible Sound Levels**

| Land Use Type | Land Use Designations | Permissible Ambient Level ($L_{dn}$ or CNEL) | |
|---|---|---|---|
| | | Interior | Exterior[3] |
| Residential | Low Density Residential<br>Low Medium Density Residential<br>Medium Density Residential | 45 | 60/65[1] |
| | Medium High Density Residential | 45 | 65/70[2] |
| | High Density Residential | 45 | 70[1] |
| Commercial and Office | General Commercial Center | - | 70 |
| | Residential Office | 50 | 70 |
| Industrial | Business Park<br>Light Industrial<br>Heavy Industrial | 55 | 75 |
| Public and Medical Uses | Public/Quasi-Public/Open Space | 50 | 65 |
| | Hospital/Medical | 50 | 70 |
| Airport | Airport | - | 70 |

Notes:
[1]The normally acceptable standard is 60 dBA. The higher standard is acceptable subject to inclusion of noise-reduction features in project design and construction.
[2]Maximum exterior noise levels up to 70 dBA CNEL are allowed for Multiple-Family Housing.
[3]Regarding aircraft-related noise, the maximum acceptable exposure for new residential development is 60 dBA CNEL.
Source: City of Torrance 2010.

*Torrance Municipal Code*

Noise from construction activities is regulated in TMC Section 6-46.3.1 (Construction of Buildings and Projects). It is unlawful for any person in Torrance to operate power construction tools, equipment, or engage in the performance of any outside construction or repair work on buildings, structures, or projects in or adjacent to a residential area involving the creation of noise beyond 50 dBA as measured at property lines, except between the hours of 7:30 a.m. and 6:00 p.m., Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturdays. Construction is prohibited on

Sundays and holidays observed by Torrance, with the exception of between the hours of 10:00 a.m. to 4:00 p.m. for homeowners that reside at the property.

Additionally, heavy construction equipment such as pile drivers, mechanical shovels, derricks, hoists, pneumatic hammers, compressors, or similar devices are prohibited to operate at any time within or adjacent to a residential area without first obtaining permission from the Community Development Director to do so. Such request for permission shall include a list and type of equipment to be used and the requested hours and locations of its use, and the applicant shall be required to show that the selection of equipment and construction techniques has been based on minimization of noise within the limitations of such equipment as is commercially available or combinations of such equipment and auxiliary sound barriers. Such permission to operate heavy construction equipment will be revoked if operation of such equipment is not in accordance with the approval of the Community Development Director (TMC Section 6-46.3.1).

Whereas the noise standards of the Noise Element are primarily used to ensure noise/land use compatibility with ambient noise levels, which are dominated by transportation noise sources, the noise regulations in the TMC are used to regulate noise from local onsite noise sources, such as mechanical equipment or event noise. TMC Division 4, Public Health and Welfare, Chapter 6, Noise Regulation, establishes noise level limits in most residential areas of 50 to 55 dBA between 7:00 a.m. and 10:00 p.m., and 45 to 50 dBA between 10:00 p.m. and 7:00 a.m., depending on location. The regulations establish regions with differing noise regulations, with the noise standards in Region 4 – where this Project site is located – being the most lenient. As shown in Table 3.11-11, the highest permitted noise level for residences in Region 4 is 55 dBA from 7:00 a.m. to 10:00 p.m. and 50 dBA from 10:00 p.m. to 7:00 a.m. as measured from the residential property line. TMC Section 6-46.7.2 Subsection 3c states that for noises occurring less than 30 minutes per day or less than 6 minutes per night, the highest allowable noise level is adjusted upward by 15 dBA (i.e., for Region 4, 70 dBA from 7:00 a.m. to 10:00 p.m. and 65 dBA from 10:00 p.m. to 7:00 a.m.).

**Table 3.11-11. Torrance Municipal Code Noise Regulations**

| Region of Noise Receiver | Noise Level (dBA) | |
|---|---|---|
| | Day | Night |
| 3 | 50 | 45 |
| 4 | 55 | 50 |

Source: TMC, Division 4, Chapter 6, Article 7, Section 46.7.2.

### 3.11.4 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on noise if it would do any of the following:

a) The project would generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
b) The project would generate excessive ground-borne vibration or ground-borne noise levels.
c) For a project within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, the project would expose people residing or working in the project area to excessive noise levels.

*Screened-Out Threshold(s):*

- Threshold (c) (*Private Airstrip or Airport Land Use Plan Area*): The Initial Study (IS) (see Appendix A) prepared for the proposed BCHD Healthy Living Campus Master Plan determined that the proposed Project would not result in noise impacts associated with a public airport or private airstrip. The Project site is located approximately 5.75 miles south of the Los Angeles International Airport (LAX) and is not located within an Airport Land Use Plan. Therefore, the proposed Project would not expose people residing or working at the Project site to excessive noise levels from an airport or airstrip. Therefore, for the reasons stated above and as discussed in Section XIII, *Noise and Vibration* of the IS, this issue is not further analyzed in the EIR.

*Construction Noise Levels*

The timing of construction noise impacts is an important factor in determining significance. In any urban area, residents expect to be exposed periodically to construction noise during normal working hours on weekdays and for more abbreviated periods on Saturdays (and sometimes Sundays). As described in Section 3.11.3, *Regulatory Setting*, construction activities are permitted in Redondo Beach between 7:00 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (RBMC Sections 4-24.503 and 9-1.12). Similarly, construction activities are permitted in Torrance between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (TMC Section 6-46.3.1). Neither of the local noise ordinances establish

quantitative noise limits or other standards for construction. The RBMC and TMC provide noise standards for interior and exterior levels in residential areas; however, these noise standards do not apply to construction activities (refer to Section 3.11.3, *Regulatory Setting*).

Neither Redondo Beach nor Torrance have established standards or thresholds for evaluating the environmental impacts of construction noise. Recent EIRs prepared by the City of Redondo Beach have relied on the City of Los Angeles CEQA Guidelines (2006) significance threshold for construction noise, while recent EIRs prepared by the City of Torrance have applied thresholds based in part upon Table N-2 of the General Plan Noise Element.[1] However, these thresholds differ and, given the location of the Project site within Redondo Beach and partially within City of Torrance right-of-way, BCHD has elected to identify a standardized threshold that is applicable across all local jurisdictions (i.e., it does not rely on a single city's general plan). For that reason, the Detailed Analysis Construction Noise Criteria presented in the FTA's Transit Noise and Vibration Impact Assessment Manual Guidelines will be considered in this EIR based on the reasonable criteria for assessment and if exceeded, could result in adverse community reaction (FTA 2018; see Table 3.11-12). As discussed further below, both cities use the FTA's Transit Noise and Vibration Impact Assessment Manual for the assessment of physical impacts associated with ground-borne vibration, which further supports the suitability of these criteria.

In the absence of an established construction noise level criteria, the FTA has stated that an 8-hour $L_{eq}$ of 80 dBA and a 30-day average of 75 $L_{dn}$ is a reasonable criterion for assessment of construction activities on residential land use (FTA 2018). The FTA asserts that project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. The metric $L_{eq}$ shall be used to assess construction noise, and this unit of measurement is appropriate because $L_{eq}$ can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,
- Average noise over all phases of the construction.

Given the length of construction associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program, the noise metric $L_{dn}$, averaged over 30-days was also assessed. A detailed quantitative construction noise assessment utilizing the FHWA

[1] *"For the purposes of determination of significant impact from temporary construction noise, the City of Torrance applies a threshold of 75 dBA, based in part upon Table N-2 of the General Plan Noise Element."* Solana Residential Development Project Draft EIR (State Clearinghouse [SCH] No. 2017071061).

Roadway Construction Noise Model and FTA Noise and Vibration Impact Assessment Manual has been completed based on the length of the development programs and the proximity to sensitive receptors.

**Table 3.11-12. Construction Noise Impact Criteria for a Detailed Quantitative Construction Noise Assessment**

| Land Use | $L_{eq}$ (dBA) | | $L_{dn}$ (dBA) |
|---|---|---|---|
| | Day | Night | 30-day average |
| Residential | 80 | 70 | 75 |
| Commercial | 85 | 85 | 80 |
| Industrial | 90 | 90 | 85 |

Source: FTA 2018.

*Operational Noise Levels (Permanent Increase in Ambient Noise Levels in Excess of Standards)*

With regard to operational noise, RBMC Section 4-24.401 states that the allowable interior noise level for residential properties is 40 dBA from 10:00 p.m. to 7:00 a.m. and 45 dBA from 7:00 a.m. to 10:00 p.m. With regard to exterior noise levels (other than construction noise), RBMC Section 4-24.301 states that no person may operate, or cause to be operated, any source of sound at any location within the City or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level when measured on any other property to exceed the presumed or actual measured ambient noise level for the various land use categories in RBMC Section 4-24.301.

TMC Section 46.7.2 establishes exterior noise level limits in most residential areas of 50 to 55 dBA between 7:00 a.m. and 10:00 p.m., and 45 to 50 dBA between 10:00 p.m. and 7:00 a.m., depending on location. TMC Ordinance 4-24.509 (Refuse Collection Vehicles) prohibits the operation of refuse collection vehicles between the hours of 7:00 p.m. and 7:00 a.m. in a residential area.

As described in Section 3.11.1, *Fundamentals of Sound and Environmental Noise*, a noise level increase of 3-dBA is barely perceptible to most people, a 5-dBA increase is readily noticeable, and a 10-dBA increase would be perceived as a doubling of loudness (FICUN 1980; FTA 2018). As set forth in the previous discussion of the local policies and regulations, RBMC Section 4-24, where actual ambient noise levels exceed the presumed ambient noise levels in the RBMC, the allowable noise exposure standard shall be increased in 5 dBA increments as appropriate to encompass or reflect actual ambient noise level. Therefore, because actual ambient noise levels exceed the presumed ambient noise levels for the purposes of this EIR, operational noise from the

proposed Project would be considered significant if the projected noise levels reach 5 dBA above the ambient noise levels (i.e., readily noticeable).

*Ground-borne Vibration*

For the purpose of this EIR, guidelines and criteria established by the FTA for impacts to residences and businesses as well as for impacts related to building damage within Redondo Beach and Torrance will be utilized. To assess vibration impacts associated with residences and businesses, the metric Vibration Velocity Level (VdB) is used, and levels correspond to land use category and the number of vibratory events. Construction activities within 200 feet would be potentially disruptive to vibration-sensitive uses (e.g., concert halls, television studios, etc.) (FTA 2018).

**Table 3.11-13. Ground-borne Vibration Impact Criteria for General Assessment**

| Land Use Category | Frequent Events | Occasional Events | Infrequent Events |
|---|---|---|---|
| Category 1: Buildings where vibration would interfere with interior operations. | 65 VdB | 65 VdB | 65 VdB |
| Category 2: Residences and buildings where people normally sleep. | 72 VdB | 75 VdB | 80 VdB |
| Category 3: Institutional land uses with primarily daytime use. | 75 VdB | 78 VdB | 83 VdB |

Notes:
"Frequent Events" is defined as more than 70 vibration events of the same source per day.
"Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.
"Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.
Source: FTA 2018.

When assessing vibration impacts related to buildings damage, the metric PPV (in/sec) is used (FTA 2018). The FTA has established four types of constructed buildings which can withstand varying levels of vibration. As such, the FTA has assigned threshold criteria of PPV where if exceeded, building damage could be expected (see Table 3.11-14).

**Table 3.11-14. FTA Construction Vibration Damage Criteria**

| Building Category | PPV (in/sec) |
|---|---|
| I. Reinforced-concrete, steel, or timber (no plaster) | 0.5 |
| II. Engineered concrete and masonry (no plaster) | 0.3 |
| III. Non-engineered timber and masonry buildings | 0.2 |
| IV. Buildings extremely susceptible to vibration damage | 0.12 |

Source: FTA 2018.

Methodology

*Construction Noise Levels*

The precise construction timeline for the Phase 1 preliminary site development plan and the Phase 2 development program depends on the timing of entitlements and permit processing. For the purposes of this EIR, construction activity for Phase 1 of the proposed Project is assumed to begin in Spring 2022 and extend over approximately 29 months into the Summer 2024 (refer to Section 2.5.1.6, *Construction Activities*). It is expected that construction activities during the Phase 1 construction time period would include overlapping construction activities including approximately 3 months for soil excavation, grading, and utility work; 7 months for exterior hardscape improvements; 24 months for the construction of the proposed RCFE Building; and 2 months for the demolition of the existing Beach Cities Health Center, including backfill of the existing basement. Phase 2 construction activities would last for a period of 28 months and would be dependent upon the timing of the permit process and financing considerations (refer to Section 2.5.2.4, *Construction Activities*). It is expected that construction activities during the Phase 2 construction time period also would include overlapping activities including approximately 3 months for demolition, soil excavation, grading, and utility work; 27 months for the construction; and 8 months for the hardscape and landscape improvements.

Construction-related noise and ground-borne vibration would be generated by various types of equipment as a result of construction activities anticipated to occur on the Project site. Construction noise levels are estimated based on the anticipated construction equipment inventory, estimated duration of construction, anticipated construction phasing distance, all of which were developed with significant input from construction managers/schedulers at CBRE, and the distance between the construction activities at the Project site and the noise-sensitive land uses (refer to Table 3.11-5).

Construction noise levels at on- and off-site locations were estimated using the FHWA Roadway Construction Noise Model where inputs included distance from construction equipment to receptor, equipment types, and usage factor, which is presented as a percentage of the equipment operating at full power within a given time frame.

As described in Section 3.11.1, *Fundamentals of Sound and Environmental Noise*, noise levels diminish rapidly with distance from the construction site, at a rate of approximately 6 dBA per doubling of distance. This assumption applies only if equipment is generally stationary or confined to specific areas during construction. For example, a noise level of 86 dBA measured at 50 feet from the noise source to the receptor would reduce to 80 dBA at 100 feet from the source to the

receptor, and reduce by another 6 dBA to 74 dBA at 200 feet from the source to the receptor. The construction noise levels at the offsite sensitive uses can be determined with the following equation from FTA's Transit Noise and Vibration Impact Assessment Manual:

$$L_{eq} = L_{eq} \text{ at 50 feet} - 20 \text{ Log}(D/50)$$

Where: $L_{eq}$ = noise level of noise source (equipment), D = distance from the noise source to the receiver, $L_{eq}$ at 50 feet = noise level of source at 50 feet.

**Table 3.11-15. Noise Ranges of Typical Construction Equipment**

| Construction Equipment | Noise Levels in dBA $L_{max}$ at 50 Feet |
|---|---|
| Front loader | 73–86 |
| Trucks | 82–95 |
| Cranes (moveable) | 75–88 |
| Cranes (derrick) | 86–89 |
| Vibrator | 68–82 |
| Saws | 72–82 |
| Pneumatic impact equipment | 83–88 |
| Jackhammers | 81–98 |
| Pumps | 68–72 |
| Generators | 71–83 |
| Compressors | 75–87 |
| Concrete mixers | 75–88 |
| Concrete pumps | 81–85 |
| Back hoe | 73–95 |
| Tractor | 77–98 |
| Scraper/grader | 80–93 |
| Paver | 85–88 |

Note: Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.
Source: U.S. Department of Transportation 2013.

*Operational Noise Levels*

Existing ambient noise levels were measured along the streets in the vicinity of the Project site and along the proposed construction haul routes (refer to Table 3.11-3). Because traffic is the primary component of the noise environment in the vicinity, these measurements are indicative of local roadway noise. Roadway noise associated with the proposed Project was considered in terms of the increases in operational vehicle trips compared to existing conditions. Existing traffic noise was determined based on traffic counts along the roadways in the immediate vicinity of the Project site and subsequent noise modeling. Changes in trip volumes associated with Phase 1 and Phase 2

of the proposed Project were provided by Fehr & Peers in the Transportation Study prepared for the proposed Project (see Appendix K).

With respect to stationary sources of noise, projected noise levels generated from the proposed Project's stationary sources were estimated based on the typical noise levels (dBA) generated from urban noise sources, such as HVAC equipment, delivery trucks, and other common uses (refer to Table 3.11-1). Stationary source noise levels were then estimated for nearby sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6 dBA for each doubling of distance. The distance from the noise-sensitive receptors in the vicinity of the Project site to the noise source (i.e., loudspeaker) from proposed outdoor fitness classes and other community events was measured at the center of the proposed central lawn within the interior portion of the campus.

*Ground-borne Vibration Associated with Construction Equipment*

Ground-borne vibration levels resulting from construction activities were estimated using FTA-published data (FTA 2018). Potential vibration levels are identified for on- and off-site locations that are sensitive to vibration, including residences and schools. The vibration levels at sensitive uses can be determined with the following equation from the FTA's Transit Noise and Vibration Impact Assessment Manual:

$$Lv\ (D) = Lv\ (25\ \text{feet}) - 30\text{Log}(D/25)$$

Where: Lv = vibration level of equipment, D = distance from the equipment to the receiver, Lv (25 feet) = vibration level of equipment at 25 feet.

This equation was used to assess vibration calculations with inputs for bulldozer vibration levels from the FTA's Transit Noise and Vibration Impact Assessment Manual. According to the FTA, the vibration levels from a bulldozer are 0.089 PPV and 87 VdB at 25 feet. This was attenuated for distance to the nearest sensitive receptors.

As previously described, the FTA considers construction activities within 200 feet to be potentially disruptive to vibration-sensitive uses (FTA 2018). The Morrell House and Queen Anne House at Dominguez Park are located approximately 600 feet north of the Project site (refer to Table 3.11-6; Section 3.4, *Cultural Resources and Tribal Cultural Resources*). As such, these local landmarks would not be affected by ground-borne vibration associated with construction activities (e.g., bull dozers) associated with the proposed Project. Therefore, impacts to historic buildings or structures associated with construction-related vibration are not discussed further in this EIR.

Operation of the proposed Project – including the residential, medical office, community service, administrative, and restaurant uses – would not be anticipated to generate excessive levels of ground-borne vibration. Occasionally, vibration could occur along adjacent roadways as a result of truck travel to and from the Project site for periodic deliveries; however, no substantial sources of ground-borne vibration would be introduced as part of the proposed Project. Therefore, operation of the proposed Project would not expose sensitive receptors on-site or off-site to excessive ground-borne vibration or ground-borne noise levels and operational sources of ground-borne noise are not discussed further in this EIR.

### 3.11.5 Project Impacts and Mitigation Measures

Impact Description (NOI-1)

a) *The project would generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

**NOI-1** **Construction activities associated with proposed Project – including the Phase 1 preliminary development plan and the more general Phase 2 development program – would result in a temporary, but prolonged increase in noise levels at the following noise-sensitive residential areas: 1) Beryl Street between North Prospect and Flagler Lane; 2) Flagler Lane and Flagler Alley between Beryl Street and North Prospect Avenue; 3) Diamond Street between Flagler Alley and North Prospect Avenue; and, 4) North Prospect Avenue between Diamond Street and Beryl Street. While compliance with the Redondo Beach and Torrance Noise Regulations and implementation of a Construction Noise Management Plan would reduce construction noise, construction noise levels would exceed Federal Transit Administration (FTA) thresholds and this impact would remain *significant and unavoidable* during both Phase 1 and Phase 2 of the proposed Project.**

*On-site Construction Noise*

Development under the Phase 1 preliminary site development plan would require excavation of approximately 20,000 cubic yards (cy) of asphalt and soil for the subterranean service area and loading dock, followed by the construction of the proposed 203,700-square-foot (sf) RCFE Building, and demolition of the existing 158,000-sf Beach Cities Health Center and 3,200-sf maintenance building. Phase 1 construction would occur over approximately 29 months. Development under the Phase 2 development program would require demolition of the existing

above ground parking structure and potentially the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) as well as excavation of approximately 30,250 cy of asphalt and soil for the subterranean levels of the proposed parking structure. Demolition and excavation activities would be followed by the construction of the proposed Wellness Pavilion, Aquatics Center, and the Center for Health and Fitness (CHF), as well as a 292,500-sf parking structure. Phase 2 construction would occur over 28 months.

All phases of construction would involve the use of heavy equipment (e.g., cranes, tractors, loaders, excavators, etc.) that would produce noise. Construction activities would also involve the use of smaller power tools, generators, and other equipment that generate noise. Construction of the subterranean levels would involve the use of typical *"drill and pour"* cast-in-place concrete piles. Haul trucks used to deliver construction materials and to export soil and demolition debris would generate noise along the local roadways to and from the Project site. Each stage of construction would involve a different mix of operating equipment, and noise levels would vary based on the amount and types of equipment in operation and the location of the activity.

Construction activities would produce increased noise levels that would impact surrounding noise-sensitive receptors. Existing on-site noise-sensitive receptors include the Silverado Beach Cities Memory Care Community, Beach Cities Child Development Center, and outpatient medical facilities. Off-site noise sensitive receptors include single-family residential uses to the south, east, and west, multi-family residences to the north. Additionally, Dominguez Park is located adjacent to the northeast of the Project site and Towers Elementary School is located approximately 350 feet to the east (refer to Table 3.11-5 and Figure 3.11-1). Approximate noise levels anticipated to occur at these nearby noise-sensitive land uses during the Phase 1 and Phase 2 construction activities are presented in Table 3.11-16 and Table 3.11-17, respectively. The metric $L_{eq}$ is used to assess noise levels over the period of the construction day and is the average acoustic energy of noise for a given period. Thus, the $L_{eq}$ of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. Additionally, a 30-day average of the metric $L_{dn}$ is presented to assess prolonged construction activities. $L_{dn}$ is a 24-hour average $L_{eq}$ with a 10 dBA *"weighting"* or *"penalty"* during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour $L_{eq}$ would result in a measurement of 66.4 dBA $L_{dn}$ Some construction activities would overlap resulting in increased noise levels. Noise levels presented represent conservative estimates where construction activities might only overlap for a few weeks. Distances from construction activities to sensitive receptors were measured from the boundary of the Project site and nearest the specific phase development to the closest sensitive receptor.

## Table 3.11-16. Phase 1 Estimated Construction Noise Levels at Sensitive Receptors

| Construction Activity | West Torrance Residences adjacent to Flagler Alley (80 feet) | | West Torrance Residences adjacent to Flagler Lane (80 feet) | | Redondo Beach Residences along Beryl Street to the North (110 ft) | | Redondo Beach Residences along North Prospect Avenue (260 ft) | | Redondo Beach Residences along Diamond Street (290 ft) | | Towers Elementary School to the East (350 feet) | | On-site Beach Cities Health Center Memory Care / Child Care Facilities RCFE Building (200 feet) | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ |
| Excavation/ Shoring | 85 | 77 | 85 | 79 | 82 | 77 | 75 | 71 | 74 | 69 | 72 | 68 | 72* | 69 |
| Foundations | 85 | 77 | 85 | 79 | 82 | 77 | 75 | 71 | 74 | 69 | 72 | 68 | 72* | 69 |
| Structural | 86 | 78 | 86 | 80 | 83 | 78 | 76 | 76 | 75 | 69 | 73 | 68 | 73* | 70 |
| External Finishing | 87 | 79 | 87 | 80 | 84 | 79 | 76 | 76 | 75 | 69 | 74 | 69 | 74* | 70 |
| Demolition | 85 | 77 | 85 | 79 | 82 | 77 | 75 | 71 | 74 | 69 | 72 | 68 | 72* | 69 |
| **Exceeds $L_{eq}$ Threshold of 80 dBA?** | **Yes** | | **Yes** | | **Yes** | | **No** | | **No** | | **No** | | **No** | |
| **Exceeds 30-day avg. $L_{dn}$ Threshold of 75 dBA?** | | **Yes** | | **Yes** | | **Yes** | | **Yes** | | **No** | | **No** | | **No** |

Note: Noise levels at off-site sensitive uses were determined with the following equation from the FTA Transit Noise and Vibration Impact Assessment Manual: $L_{eq} = L_{eq}$ at 50 feet. – 20 Log(D/50), where $L_{eq}$ = noise level of noise source, D = distance from the noise source to the receiver, $L_{eq}$ at 50 feet = noise level of source at 50 feet. The highest $L_{eq}$ noise levels during each construction phase are used for a conservative analysis. Noise levels have been rounded up to the nearest whole number.
Assumed Torrance Towers Elementary School has the same daytime/nighttime $L_{eq}$ as Flagler Lane.
Assumed Memory Care and Child Care facilities has the same daytime/nighttime $L_{eq}$ as North Prospect Avenue.
* Includes 5 dB reduction based of line-of-sight obstruction (Beach Cities Health Center located at 514 North Prospect Avenue) between receptor and Phase 1 project footprint
# for $L_{dn}$ calculation daytime $L_{eq}$ noise levels taken from ambient levels in Table 3.11-4 and nighttime $L_{eq}$ noise levels were assumed 5 dBA below daytime levels.
30-day average includes 26 working days and 4 non-working days.
Sources: FHWA 2008; FTA 2018; U.S. Environmental Protection Agency (USEPA) 1971.

## Table 3.11-17. Phase 2 Estimated Construction Noise Levels at Sensitive Receptors

| Construction Activity | West Torrance Residences adjacent to Flagler Alley (80 feet) | | West Torrance Residences adjacent to Flagler Lane (80 feet) | | Redondo Beach Residences along Beryl Street to the North (110 feet) | | Redondo Beach Residences along North Prospect Avenue (260 feet) | | Redondo Beach Residences along Diamond Street (290 feet) | | Towers Elementary School to the Northeast (560 feet) | | On-site RCFE Building (50 feet) | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ | $L_{eq}$ | 30-day avg. $L_{dn}$ |
| Demolition/ Excavation | 87 | 79 | 87 | 80 | 79 | 74* | 76 | 72 | 75 | 69 | 70 | 66 | 91 | 91 |
| Foundations (Building) | 87 | 79 | 87 | 80 | 79 | 74* | 76 | 72 | 75 | 69 | 70 | 66 | 91 | 84 |
| Structural (Building) | 85 | 77 | 85 | 79 | 77 | 72* | 75 | 71 | 74 | 69 | 68 | 64 | 89 | 82 |
| External Finishing (Building) | 87 | 79 | 87 | 80 | 79 | 74* | 76 | 72 | 75 | 69 | 70 | 66 | 91 | 84 |
| Foundations (Parking) | 87 | 79 | 87 | 80 | 79 | 74* | 76 | 72 | 75 | 69 | 70 | 66 | 91 | 84 |
| Structural (Parking) | 87 | 79 | 87 | 80 | 79 | 74* | 76 | 72 | 75 | 69 | 70 | 66 | 91 | 84 |
| External Finishing (Parking) | 87 | 79 | 87 | 80 | 79 | 74* | 76 | 72 | 75 | 69 | 70 | 66 | 91 | 84 |
| **Exceeds $L_{eq}$ Threshold of 80 dBA?** | **Yes** | | **Yes** | | **No** | | **No** | | **No** | | **No** | | **Yes** | |
| **Exceeds 30-day avg. $L_{dn}$ Threshold of 75 dBA?** | | **Yes** | | **Yes** | | **No** | | **No** | | **No** | | **No** | | **Yes** |

Note: Noise levels at off-site sensitive uses were determined with the following equation from the FTA Transit Noise and Vibration Impact Assessment, Manual: $L_{eq}$ = $L_{eq}$ at 50 feet. – 20 Log(D/50), where Leq = noise level of noise source, D = distance from the noise source to the receiver, $L_{eq}$ at 50 feet = noise level of source at 50 feet. The highest Leq noise levels during each construction phase are used for a conservative analysis. Noise levels have been rounded up to the nearest whole number.
Assume Torrance Towers Elementary School has the same daytime/nighttime $L_{eq}$ as Flagler Lane
Assume Memory Care and Child Care facilities has the same daytime/nighttime $L_{eq}$ as Flagler Lane.
* - includes 5 dB reduction based of line of sight obstruction between RCFE and Beryl Street
# for $L_{dn}$ calculation daytime $L_{eq}$ noise levels taken from ambient levels in Table 3.11-4 and nighttime $L_{eq}$ noise levels were assumed 5 dBA below daytime levels. 30-day average includes 26 working days and 4 non-working days.
Sources: FHWA 2008; FTA 2018; USEPA 1971.

As described in Section 3.11.1, *Fundamentals of Sound and Environmental Noise*, construction noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA for every doubling of distance at acoustically hard locations. For example, a noise level of 88 dBA measured at 50 feet from the noise source to the receptor would reduce to 82 dBA at 100 feet from the source to the receptor, and reduce by another 6 dBA to 76 dBA at 200 feet from the source to the receptor.

Consistent with RBMC Section 4-24.503 and TMC Section 6-46.3.1, construction activities would be restricted to the hours of 7:30 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays. No construction activities would occur on Sundays or public holidays.

Based on the FTA's quantitative construction noise impact criteria, the proposed construction activities during both Phase 1 and Phase 2 would have significant impacts to noise-sensitive receptors for the duration of the construction phases, because the projected $L_{eq}$ would exceed the *Residential* criteria (8-hour $L_{eq}$ of 80 dBA and 30-day average $L_{dn}$ of 75 dBA) (refer to Tables 3.11-16 and 3.11-17).

To reduce impacts from construction noise, MM NOI-1 would require the implementation of noise attenuation measures including the use of noise barriers (e.g., sound walls). Noise levels could be reduced by 3 to 15 dBA depending on the type, height, and length of the noise barrier (FTA 2018). Standard noise barriers blocking the line of sight between the noise source and receptor could result in reduction of 6 to 10 dBA if the barrier is placed either close to the source or close to the receptor (FTA 2018). Noise barriers placed at a distance from the source or receptor might only reduce noise levels by 3 dBA even if the line of sight is blocked (FTA 2018). The effectiveness of barriers can be increased by as much as 5 dBA by applying sound-absorbing material to the inner surface of the barrier (FTA 2018).

The proposed RCFE Building constructed during Phase 1 would be 6 stories tall with a finished roof height of 82 feet from the ground surface and rooftop projections (e.g., enclosed cooling towers) that would extend an additional 21 feet to a total height of 103 feet from the existing campus ground surface. Additionally, the proposed parking structure constructed during Phase 2 would rise to a similar height. Table 3.11-18 depicts the various noise barrier height requirements to block the line of sight between construction on specific floors and the nearest sensitive receptors located in Redondo Beach (North Prospect Avenue and Diamond Street) and West Torrance (Flagler Alley).

**Table 3.11-18. Noise Barrier Height Requirements to Block the Line of Sight and Reduce Noise Levels in West Torrance**

| Floor | Max Height of Construction Floor Level (feet) | Barrier at the Edge of BCHD Development Footprint (feet)* | Barrier at the BCHD Property Line (feet)* | Barrier at the West Torrance Property Line (feet)* |
|---|---|---|---|---|
| 1st | 18 | 20 | 15 | 20 |
| 2nd | 31 | 35 | 25 | 20 |
| 3rd | 44 | 45 | 35 | 20 |
| 4th | 57 | 60 | 40 | 20 |
| 5th | 70 | 75 | 50 | 20 |
| 6th | 82 | 85 | 60 | 20 |
| Rooftop Projections | 103 | 105 | 70 | 20 |

Notes: *approximate
Assumptions:

1) The campus is located approximately 30 feet above the grade of the adjacent West Torrance neighborhood.
2) The 1st story of residential development within West Torrance is blocked by a concrete wall, which would provide noise attenuation. However, the 2nd story windows – located at a height of approximately 15 feet – would be directly impacted to construction noise.
3) The distance of construction activities is approximately 80-feet from the nearest West Torrance residence
4) Noise barrier heights are assumed in 5-foot increments.

The feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership. Noise barriers are most commonly developed to a height of between 10 and 30 feet. While there have been noise barriers developed to a height of 143 feet to enclose drilling rigs, the base of these enclosures is less than 180 feet by 180 feet and then narrows as height increases (Nederlandse Aardolie Maatschappij 2007). This height is achieved by constructing all four-sides to share equal structural load and withstand winds, up to 78 miles per hour (mph) (Nederlandse Aardolie Maatschappij 2007). For Phase 1 and Phase 2 construction, the necessary noise barrier heights (i.e., up to 105 feet) at the edge of the BCHD development footprint are too great to allow only one- to three-sided barriers and the total building footprint is too large to construct a fully enclosed four-sided noise barrier. Further, the construction of the foundation and framing structure required to support a fully enclosed four-sided noise barrier would result in significant and unavoidable noise impacts to adjacent residential areas in Redondo Beach and West Torrance.

A shorter noise barrier could be constructed at the edge of the sensitive receptors in West Torrance (and similarly in Redondo Beach). However, any such off-site construction of a noise barrier would require approval from the City of Torrance and/or the City of Redondo Beach, which cannot be assured. Additionally, while the construction of a 30-foot-tall noise barrier may be feasible along Flagler Lane and Flagler Alley, a 30-foot noise barrier along Beryl Street and North Prospect Avenue fronting residences may not be feasible.

In an effort to reduce construction noise levels, a 30-foot noise barrier would be erected on BCHD property and encompass the development footprint associated with Phase 1 and Phase 2 of construction. With implementation of a 30-foot noise barrier, sensitive receptors would not be directly impacted by construction noise until development reached a height that exceeded the noise barrier (Table 3.11-19 and Table 3.11-20).

**Table 3.11-19. Construction Noise Levels at Sensitive Receptors with a 30-foot Noise Barrier during Phase 1**

| Receptor | Max Height of Construction Floor for Barrier Reduction | Additional Floors with No Noise Level Reduction | Maximum Construction Daytime $L_{eq}$ without Barrier | Maximum Barrier Reduction Daytime $L_{eq}$ | Minimum Barrier Reduction Daytime $L_{eq}$ |
|---|---|---|---|---|---|
| West Torrance/ Flagler Lane | 2nd Floor (31 feet) | 5 | 87 | 72 | 75 |
| West Torrance Flagler Alley | 3rd Floor (44 feet) | 4 | 87 | 72 | 82 |
| Redondo Beach/ Beryl Street | 4th Floor (57 feet) | 3 | 84 | 69 | 77 |
| Redondo Beach/ Diamond Street | 3rd Floor (44 feet) | 4 | 75 | 60 | 60 |
| Redondo Beach/ North Prospect Avenue | 2nd Floor (31 feet) | 5 | 76 | 61 | 61 |
| ~~Memory Care/ Child Care~~ Beach Cities Health Center/ RCFE Building | 2nd Floor (31 feet) | 5 | 74* | 59* | 59* |
| Torrance Towers Elementary School | 2nd Floor (31 feet) | 5 | 74 | 59 | 59 |

Notes: Notes: $L_{eq}$ presented are the maximum over the course of the entire phase of construction.
* includes 5 dBA reduction based of line of sight obstruction (Beach Cities Health Center located at 514 North Prospect Avenue) between receptor and Phase 1 project footprint
Assumptions:

1) The campus is located approximately 30 feet above the grade of homes along Flagler Alley and Diamond St.
2) Proposed development across from Beryl St occurs at grade and 30-feet above grade, assume noise-barrier at grade along property line at Beryl St. and barrier at development footprint 30-feet above grade.
3) Noise source height is 15-feet for second story windows/balconies.
4) The distance of construction activities is approximately 80-feet from the nearest West Torrance residence
5) Shielding effect from existing hospital between RCFE development and Memory Care/Child Care

**Table 3.11-20. Construction Noise Levels at Sensitive Receptors with a 30-foot Noise Barrier during Phase 2**

| Receptor | Max. Height of Construction Floor for Barrier Reduction | Additional Floors with No Noise Level Reduction | Construction Daytime $L_{eq}$ without Barrier | Max. Barrier Reduction Daytime $L_{eq}$ | Min. Barrier Reduction Daytime $L_{eq}$ |
|---|---|---|---|---|---|
| West Torrance/ Flagler Lane | 2nd Floor (31 feet) | 5 | 87 | 62 | 62 |
| West Torrance Flagler Alley | 3rd Floor (44 feet) | 4 | 87 | 62 | 82 |
| Redondo Beach/ Beryl Street | 4th Floor (57 feet) | 3 | 79* | 64* | 64* |
| Redondo Beach/ Diamond Street | 3rd Floor (44 feet) | 4 | 76 | 61 | 63 |
| Redondo Beach/ North Prospect Avenue | 2nd Floor (31 feet) | 5 | 75 | 60 | 63 |
| RCFE Building~~/ Assisted Living Memory Care~~ | 2nd Floor (31 feet) | 4 | 91 | 76 | 76 |
| Torrance Towers Elementary School | 2nd Floor (31 feet) | 5 | 70 | 55 | 55 |

Notes: $L_{eq}$ presented are the maximum over the course of the entire phase of construction.
* Includes 5 dBA reduction based of line of sight obstruction between RCFE and Beryl Street
Assumptions:

1) The campus is located approximately 30 feet above the grade of homes along Flagler Alley and Diamond Street.
2) Proposed development across from Beryl St occurs at grade and 30-feet above grade, assume noise-barrier at grade along property line at Beryl Street and barrier at development footprint 30-feet above grade.
3) Noise source height is 15-feet for second story windows/balconies.
4) The distance of construction activities is approximately 80-feet from the nearest West Torrance residence.
5) Shielding effect from RCFE to Beryl Street.

Compliance with existing local noise regulations along with the implementation of MM NOI-1 would reduce potential noise impacts; however, *significant and unavoidable* noise impacts would occur through implementation of proposed construction.

*Off-site Construction Noise*

In addition to construction-related noise generated at the Project site, off-site construction-related noise would be generated by construction-related vehicle trips (i.e., haul trucks, concrete trucks, and construction worker commutes). Project construction would generate additional construction worker commute trips associated with an average of 210 employees per day during Phase 1 (29 months) and 130 employees per day during Phase 2 (28 months). Haul trucks would be used during the site clearing and demolition phases as well as during excavation of the subterranean levels of the proposed RCFE Building during Phase 1 and parking structure during Phase 2. This haul truck

activity would be a source of off-site noise for surrounding sensitive receptors including residences and public open space (e.g., Dominguez Park). The proposed Project would result in up to 78 heavy truck trips per day over a 30-week period in Phase 1 and up to 30 heavy truck trips per day over a 35-week period in Phase 2.

Construction trucks would access the Project site via Interstate (I-) 405 traveling on 190th Street or Hawthorne Avenue to 190th Street and reach the site using Del Amo Street to North Prospect Avenue (refer to Figure 2-13). Trucks would pass by a mix of residential and commercial uses along these routes, including single- and multi-family homes, retail stores, offices, and other uses typically present in urban areas. Roadways along the inbound and outbound haul routes carry substantial volumes of traffic. For example, 190th Street between Rindge Lane and Inglewood Avenue is a four-lane road that carries approximately 40,280 average daily trips (ADT) (City of Redondo Beach 2008a).

**Table 3.11-21. Estimated Peak Period Construction Traffic Noise Levels at Sensitive Receptors**

| Receiver | $L_{eq}$ | | |
|---|---|---|---|
| | 2020 Noise Levels | 2020 Noise plus Phase 1 Construction | 2020 Noise plus Phase 2 Construction |
| North Prospect Avenue | 69.5 | 70.5 | 70.1 |
| Diamond Street (S) | 61.4 | 62.0 | 61.7 |
| Diamond Street (N) | 57.5 | 58.0 | 57.8 |
| Towers Street | 60.1 | 60.4 | 60.3 |
| Mildred Avenue | 55.4 | 55.9 | 55.7 |
| Beryl Street (S) | 66.2 | 67.1 | 67.0 |
| Beryl Street (N) | 65.5 | 66.4 | 66.0 |
| Del Amo Boulevard | 69.9 | 70.3 | 70.1 |
| W. 190th Street (W) | 69.0 | 69.2 | 69.1 |
| W. 190th Street (E) | 70.8 | 70.8 | 70.8 |

Notes: 2020 $L_{eq}$ noise levels differ slightly from monitored noise levels included in Table 3.11-3, as these are based on traffic counts used in the Transportation Study (see Appendix K).
Modeled Fleet Mix: 97 percent Auto / 2 percent Medium Truck / 1 percent Heavy Truck. For reference this fleet mix is similar to the assumption in the Draft EIR prepared for the Kensington Assisted Living Facility (SCH No. 203121065).
Source: See Appendix I.

Haul trucks typically generate traffic noise levels of 85 dBA $L_{max}$ at 50 feet (FHWA 2008). Temporary construction-related trips would increase daytime noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). The greatest increase in noise levels from construction-related trips would be an increase of 1 dBA on North Prospect Avenue to 70.8 dBA $L_{eq}$ during Phase 1 construction. Other roadways along the haul route would experience a similar

increase in noise levels. Noise contributions from these haul truck trips would be imperceptible (i.e., less than 3 dBA). In addition, the Construction Traffic and Access Management Plan under MM T-2, would require that construction haul trucks avoid residential neighborhoods to the maximum extent feasible, which would reduce roadway noise levels during construction. Therefore, noise impacts from construction-related vehicle trips would be *less than significant*.

Mitigation Measures (MM)

To further reduce the noise levels resulting from construction of the proposed Project for off-site residential uses, the following mitigation measure would be implemented:

***MM NOI-1*** ***Construction Noise Management Plan.*** *The Beach Cities Health District (BCHD) shall prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions, in accordance with Torrance Municipal Code (TMC) Section 46.3.1. The Construction Noise Management Plan would address noise and vibration impacts and identify measures that would be used to reduce impacts. At a minimum measures would include:*

- *Construction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday ~~to the maximum extent feasible~~, in accordance with Redondo Beach Municipal Code (RBMC) Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1.*

- *BCHD and its contractors and subcontractors shall coordinate approvals with the City of Redondo Beach and the City of Torrance and construct noise barriers to reduce noise levels to on- and off-site sensitive receptors, where feasible:*
    - *During Phase 1, noise barriers containing sound-absorbing materials would be constructed to a height that blocks the line-of-sight to sensitive receptors to the maximum extent feasible taking into account environmental constraints (e.g., wind loading, property ownership, etc.).*
    - *During Phase 2, noise barriers containing sound-absorbing materials would be constructed to a height that blocks the line-of-sight to sensitive receptors to the maximum extent feasible taking into account environmental constraints (e.g., wind loading, property ownership, etc.).*

- *BCHD's construction contracts shall require implementation of the following construction best management practices (BMPs) by all construction contractors and subcontractors working in or around the Project site to reduce construction noise levels:*
    - *BCHD and its contractors and subcontractors shall ensure that construction equipment is properly muffled according to manufactures specifications or as required by the Redondo Beach and City of Torrance Building & Safety Division, whichever is the more stringent.*
    - *BCHD and its contractors and subcontractors shall use electrically powered tools and facilities to the maximum extent feasible. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.*
    - *BCHD and its contractors and subcontractors shall place noise-generating construction equipment and locate construction staging areas away from on-site and off-site sensitive uses (e.g., centrally on the existing campus), where feasible, to the satisfaction of the Redondo Beach and Torrance Building & Safety Divisions.*
- *BCHD's construction contracts shall include the requirement that construction staging areas, construction worker parking and the operation of earthmoving equipment within the Project site, are located as far away from noise-sensitive sites as feasible. Contract provisions incorporating the above requirements shall be included as part of the construction documents, which shall be reviewed and approved by the City of Redondo Beach and Torrance Building & Safety Divisions prior to issuance of demolition or grading permits.*
- *BCHD's construction contracts shall include the requirement that haul trucks remain on the designated haul routes identified in the Redondo Beach and Torrance General Plans. Further, haul trucks should attempt to operate in traffic lanes that are located at the greatest distance from sensitive receptors, typically the lane nearest the roadway centerline on a four-lane roadway. Contract specifications shall be included in the proposed Project's construction documents, which shall be reviewed by the Redondo Beach and Torrance Building & Safety Divisions prior to issuance of demolition or grading permits.*

*At least 1 month prior to the initiation of construction-related activities during Phase 1 and Phase 2, BCHD shall prepare and distribute notices to residents and businesses located within a 0.25-mile radius of the Project site. At a minimum, the notices shall describe the overall construction schedule, advise residents, business owners, and employees of increased construction-related noise.*

*During construction, BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues.*

Residual Impacts

Compliance with the Redondo Beach and Torrance Noise Regulations (RBMC Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1, respectively) in conjunction with implementation of MM NOI-1 would reduce construction noise impacts; however, feasible noise barrier heights and locations would not reduce noise levels below the FTA's residential criterion (8-hour $L_{eq}$ of 80 dBA or 30-day average $L_{dn}$ of 75 dBA). Therefore, noise impacts resulting from construction of the proposed Project would be *significant and unavoidable*. See Section 5.0, *Alternatives* for discussion of alternatives to the proposed Project that would substantially reduce this impact.

Impact Description (NOI-2)

*b) The project would generate excessive ground-borne vibration or ground-borne noise levels.*

**NOI-2** **Ground-borne vibration levels generated during construction of the proposed Project – including the Phase 1 preliminary site development plan as well as the more general Phase 2 development program – would be below Federal Transit Administration (FTA) thresholds for on-site construction activities but would exceed FTA thresholds for off-site haul truck operations. Nevertheless, impacts to sensitive receptors associated with construction vibration would be *less than significant*.**

During construction, ground-borne vibration would be generated from the use of heavy construction equipment at the Project site, which could potentially expose existing sensitive land uses in the vicinity to excessive vibration. The duration and amplitude of vibration generated by construction equipment varies widely depending on the type of equipment and the purpose for which it is being used. The vibration levels of bulldozer operations (PPV of 0.089 and VdB of 87 at 25 feet) during site preparation would result in the greatest ground-borne vibration for development of Phase 1. Bulldozer operations would occur at no less than 80 feet to the nearest noise-sensitive use (i.e., single-family residences) within Torrance, and would result in a PPV of 0.016 and VdB of 72. Both PPV and VdB vibration levels would be below FTA impact criteria.

During Phase 2 site preparation, the greatest ground-borne vibration at the Project site would result from bulldozer operations within 120 feet of the nearest noise-sensitive (i.e., single-family residences) in Redondo Beach. Phase 2 bulldozer operations would result in a PPV of 0.008 and VdB of 67 at the nearest noise-sensitive use in Redondo Beach. Both PPV and VdB vibration levels would be below FTA threshold criteria of 0.12 PPV to buildings susceptible to vibration damage and 72 VdB for frequent events to residences or buildings where people normally sleep.

Under both Phase 1 and Phase 2, haul trucks would be used for delivery of materials and removal of soil and debris. Operation of loaded trucks results in PPV of 0.076 and VdB of 86 at a distance of 25-feet. Haul routes along Del Amo Boulevard, North Prospect Avenue, Beryl Street, and 190th Street have residences adjacent to traffic lanes.

**Table 3.11-22. Vibration Levels from Loaded Haul Trucks at Sensitive Receptors**

| | Beryl Street | Del Amo Boulevard | North Prospect Avenue | 190th Street |
|---|---|---|---|---|
| ***VdB (Category 2)*** | | | | |
| Lane 1 | 84 | 84 | 78 | 84 |
| **Exceeds 80 VdB?** | **Yes** | **Yes** | **No** | **Yes** |
| Lane 2 | N/A | 93 | N/A | 93 |
| **Exceeds 80 VdB?** | **N/A** | **Yes** | **N/A** | **Yes** |
| ***PPV (Building Category III)*** | | | | |
| Lane 1 | 0.058 | 0.164 | 0.068 | 0.164 |
| **Exceeds 0.2 PPV?** | **No** | **No** | **No** | **No** |
| Lane 2 | N/A | 0.058 | N/A | 0.058 |
| **Exceeds 0.2 PPV?** | **N/A** | **No** | **N/A** | **No** |

Notes: Lane 1 is furthest from the residence and Lane 2 is closest.
Del Amo Boulevard and 190th Street: Lane 1 at 30 feet and Lane 2 at 15 feet
Beryl Street: Lane 1 at 30 feet
North Prospect Avenue: Lane 1 at 45 feet
Source: FTA 2018.

Vibration levels used for determining structural damage (PPV) would not be exceeded by the operation of loaded haul trucks associated with Phase 1 or Phase 2 of development. However, vibration levels used for determining annoyance would be exceeded with loaded haul trucks operating in either Lane 1 or Lane 2 along the haul truck route with the exception of along North Prospect Avenue. Loaded trucks typically operate along 190th Street, Beryl Street, and Del Amo Boulevard given the commercial and institutional land use in the area, thus residences are currently subject to infrequent vibration levels exceeding FTA annoyance criteria for Category 3. According to the FTA, the proposed Project would have no impact, even if the existing vibration exceeds the standard vibration criteria, so long as the number of events does not increase significantly (i.e., approximate doubling of events), and the project vibration does not exceed the existing vibration by 3 dBA or more (FTA 2018). Haul truck operations associated with Phase 1 and Phase 2 would not resulting in the doubling of events, would be temporary in nature, and would not exceed the existing vibration by 3 dB or more. Therefore, vibration levels from construction equipment and haul trips associated with BCHD development would not exceed criteria established by the FTA and impacts would be *less than significant*. Recommended mitigation measure MM NOI-2 would be implemented to further reduce noise levels from heavy haul truck trips during construction associated with the proposed Project.

Recommended Mitigation Measures (MM)

To further reduce the noise levels resulting from construction of the proposed Project for off-site residential uses, the following recommended mitigation measure would be implemented:

***MM NOI-2*** ***Haul and Delivery Truck Operations.*** *Where feasible, haul and delivery truck operations associated with Phase 1 and Phase 2 development would enter and exit the Project site utilizing Lane 1 (the lane farthest from residences) along the given haul route.*

Impact Description (NOI-3)

*a) The project would generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

**NOI-3** **Operational noise associated with the proposed Project – particularly noise associated with outdoor events (e.g., movie nights, farmers' markets, fitness classes, etc.) – would result in potentially significant noise impacts. However, operational noise impacts would be *less than significant with mitigation*.**

Long-term operations of the proposed Project would include noise from HVAC equipment, delivery trucks, and parking operations. In addition, on-site outdoor activities associated with the proposed Healthy Living Campus Master Plan – including outdoor fitness classes, outdoor movie nights, farmers' markets, etc. – would result in additional periodic noise.

*HVAC Equipment*

Large HVAC systems like those associated with the proposed Project can result in noise levels up to 100 dBA at a distance of 3 feet (U.S. Environmental Protection Agency [USEPA] 1971). However, these units are typically fitted with noise shielding cabinets or are placed on the roof or in mechanical equipment rooms to reduce noise levels. Typically, the shielding and location of these units reduces noise levels to no greater than 55 dBA $L_{eq}$ at 50 feet from the source (County of Santa Barbara 2016). The HVAC systems for the proposed Project would be located on the roofs of the buildings and would be enclosed to reduce associated noise. Additionally, noise from mechanical equipment associated with operation of the proposed Project would be required to comply with the California Building Code (CBC) requirements pertaining to noise attenuation, resulting in a noise level reduction of approximately 20 dBA (refer to Section 3.11.3, *Regulatory Setting*). Therefore, noise associated with the proposed Project's HVAC systems or mechanical equipment noise would not exceed maximum exterior noise limits for Redondo Beach or Torrance and impacts would be *less than significant.*

*Substation and Electrical Yard*

The proposed electrical yard would include a new Southern California Edison (SCE) substation yard, medium voltage distribution system, and generator yard. New voltage substation transformers generate noise levels of 45 to 50 dBA at a distance of 50 feet (National Electrical Manufacturers Association 2014; Delta Transformers Inc. 2009). The electrical yard would be located on the southern portion of the Project site, approximately 100 feet from the nearest residence located on Diamond Street. Based on this distance, noise levels of the electrical yard would be 44 dBA at the nearest residence. The existing daytime noise levels of 63 $L_{dn}$ along Diamond Street, which is largely due to the relatively high level of traffic noise along streets in the vicinity of the Project site. Therefore, noise impacts relating to the electrical yard would likely be imperceptible and would result in *less than significant* operational noise impacts.

*Delivery and Service Trucks*

Operation of the proposed Project would involve daily delivery of goods and trash hauling services to support residential, medical office, administrative, and restaurant uses associated with the proposed Project. The service area and loading dock would be located within the subterranean

levels below the RCFE Building, accessible from the proposed dedicated entry/exit along Flagler Lane. Given the relatively narrow two-lane roadway along Flagler Lane, deliveries would be made by a mix of small, medium, and large two-axle trucks. While a specific frequency of deliveries is unknown at this time, given the size of the proposed Project, deliveries of various kinds could be expected on a daily basis, with larger trucks arriving to and departing from the Project site several times per week. Trash hauling would occur over an average of 3 days per week with a medium-sized trash truck, although frequency could increase in summer and immediately following community events on the central lawn or private events at the proposed Aquatics Center.

Noise generated by delivery, trash hauling, and other service trucks would mainly consist of short-term temporary increases in peak sound levels from diesel engines, backup beepers as required by California Division of Occupational Safety and Health (Cal OSHA), braking, and the sound of truck bays being opened and closed along with loading and unloading activities. Backup beepers are required by Cal OSHA to be at least 5 dBA above ambient noise levels. The maximum sound level from delivery trucks (assuming heavy-duty trucks) would be approximately 87 dBA $L_{eq}$ at 50 feet and would therefore reach up to 82.9 dBA $L_{eq}$ at a distance of 80 feet (i.e., at the nearest sensitive receptor). The proposed service area and loading dock would be below ground, which would reduce noise levels at nearby sensitive receptors by a total of up to 30 dBA or more (City of Hermosa Beach 2018). Pursuant to RBMC Section 4-24.509 (Refuse Collection Vehicles) trash pickup and delivery operations would occur between the hours of 7:00 a.m. and 7:00 p.m. This noise would be temporary in nature, typically lasting no more than 5 minutes. Trash pickup and compacting operations typically take approximately 3 minutes, with the higher noise levels occurring during about half of the operation. Implementation of MM NOI-3a would ensure deliveries and trash pick-ups would occur during the daytime operating hours (i.e., 7:00 a.m. to 4:00 p.m.) and would prohibit idling longer than 5 minutes.

These types of truck noises associated with the proposed BCHD Healthy Living Campus would be similar to existing activities occurring both on-site and in the vicinity. Existing businesses located within the Redondo Village Shopping Center already receive deliveries and trash pick-up via Beryl Street with similar noise levels. Additionally, garbage collection for existing residences within Torrance generates similar noise levels. Further, given the short-term temporary nature and subterranean location of these types of activities, they would not measurably increase the existing ambient noise levels along Flagler Lane (i.e., 72.7 dBA $L_{max}$ as shown in Table 3.11-3). Therefore, the proposed Project would not exceed 5 dBA above the ambient noise levels along Flagler Lane and impacts would be *less than significant with mitigation.*

*Emergency Vehicle Noises*

Phase 1 of the proposed Project would incrementally increase the total number of individuals requiring ambulance services through the overall addition of 177 new Assisted Living bed spaces to the existing 120 Memory Care bed spaces, bringing the total permanent residents supported at the site to 297. Based on an assumed average of 0.82 annual calls per bed space per year to the existing campus (see Section 3.13, *Public Services*), following the completion of the proposed development under the Phase 1 preliminary site development plan, it is anticipated that the campus would generate an estimated 244 ambulance calls per year.

While estimated emergency calls would increase by 149 percent, all responses would be sporadic and not all would require use of sirens, as a majority of these calls are related to medical situations that do not always require an emergency response. When sirens are necessary for an emergency response, they typically emit noise at a magnitude of approximately 100 dBA at 100 feet. A decrease of about 3 dBA occurs with every doubling of distance from a mobile noise source; therefore, during a response requiring sirens, residences along North Prospect Avenue and Beryl Street experience peak short-duration exterior noise levels between 91 and 100 dBA. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic. Thus, given the infrequent and short duration of siren utilization responding to emergency situations, noise impacts from emergency vehicles would be both negligible and *less than significant*.

*Parking Operations*

Surface parking lots can be a source of annoyance to neighboring uses due to sporadic noises from vehicles arriving and departing, tire squeals, car alarms, opening and closing of car doors, and people's voices. Parking lots with 1,000 cars during peak activity hours have a reference hourly $L_{eq}$ of approximately 56 dBA at 50 feet (FTA 2018). As such, the proposed surface parking lot developed during Phase 1 of the proposed Project, which would include 86 parking spaces, would likely generate noise levels below 56 dBA at 50 feet. Noise levels would be further attenuated at the nearest noise-sensitive receptors located along North Prospect Avenue approximately 110 feet from the boundary of the Project site boundary.

Similar to surface parking lots, noise generating activities associated with parking structures also result in sporadic noises from vehicles arriving and departing, tire squeals, car alarms, opening and closing of car doors, and people's voices. For reference, Illingworth & Rodkin, Inc. conducted noise measurements near a four-story parking structure in Downtown Petaluma. Noise measurements were made of typical noise-generating activities occurring on the various parking

levels. At each parking level, a car door was opened and closed several times, the engine was started, and the vehicle's horn was sounded. The noise sources were generated at the edge of each story and at a parking stall located about 50 feet from the edge. Noise measurements were also made as a vehicle traveled up and down the parking structure. The loudest noise was generated by a vehicle's horn. Maximum instantaneous noise levels, measured approximately 75 feet from the façade of the structure at ground level, typically ranged from 53 to 58 dBA $L_{max}$. Typical noise levels of a car horn ranged from 62 to 70 dBA $L_{max}$. However, Beryl Street and North Prospect Avenue have daytime noise levels of 63 and 65 $L_{dn}$, respectively, related to existing vehicle traffic. Due to the relatively high level of traffic noise along streets in the vicinity of the Project site, normal daytime parking garage $L_{eq}$ noise of 56 dBA would likely be imperceptible. Therefore, noise impacts relating to parking operations would result in *less than significant* operational noise impacts.

*Roadway Noise*

The proposed Project would result in a net decrease in daily and peak period vehicle trips to and from the Project site following buildout of Phase 1. Phase 2 would result in a minor increase in daily trips that would incrementally increase traffic in the area; however, peak period trips would be reduced compared to existing conditions (see Section 3.14, *Transportation*). Peak period trips represent the greatest number of vehicle operations within a 24-hour period and where vehicle operations are the dominant noise source, the greatest daily $L_{eq}$. According to the Transportation Study, the proposed Project is expected to generate up to 271 trips during the AM peak period as compared to 307 trips during the AM peak period under existing conditions (see Appendix K). Therefore, the Project would not contribute to $L_{eq}$ traffic noise, and traffic noise levels would incrementally decrease along two roadways (i.e., Diamond Street and Del Amo Boulevard) under Project implementation (see Table 3.11-23).

Future Year (2032) noise levels along the roadways in the vicinity of the Project site are based on traffic projections from the Transportation Study (see Appendix K). Future plus Project noise levels on these roadways are estimated based on the traffic projections included in the Transportation Study. Future roadway noise levels with and without the Project are compared to 2020 noise levels in Table 3.11-23.

**Table 3.11-23. Estimated Peak Period Traffic Noise Levels at Sensitive Receptors**

| Receiver | $L_{eq}$ | | |
|---|---|---|---|
| | Existing Year (2020) | Future Year (2032) Without Project | Future Year (2032) With Project |
| North Prospect Avenue | 69.5 | 69.7 | 69.7 |
| Diamond Street (S) | 61.4 | 61.5 | 61.5 |
| Diamond Street (N) | 57.5 | 57.7 | 57.6 |
| Towers Street | 60.1 | 60.2 | 60.2 |
| Mildred Avenue | 55.4 | 55.6 | 55.6 |
| Beryl Street (S) | 66.2 | 66.4 | 66.4 |
| Beryl Street (N) | 65.5 | 65.7 | 65.7 |
| Del Amo Boulevard | 69.9 | 70.1 | 70.0 |
| W. 190th Street (W) | 69.0 | 69.2 | 69.2 |
| W. 190th Street (E) | 70.8 | 71.0 | 71.0 |

Notes: 2020 $L_{eq}$ noise levels are based on traffic counts used in the Transportation Study (see Appendix K).
2032 $L_{eq}$ noise levels are based on projected traffic levels in the Transportation Study.
Modeled Fleet Mix: 97 percent Auto / 2 percent Medium Truck / 1 percent Heavy Truck. For reference this fleet mix is similar to the assumption in the Draft EIR prepared for the Kensington Assisted Living Facility (SCH No. 203121065).
Source: See Appendix I.

Passenger drop-off and pick-up to and from the RCFE Building would occur via Flagler Lane. Noise monitoring along Flagler Lane measured an $L_{eq}$ of 59.3 during AM peak period (refer Table 3.11-3). An hourly $L_{eq}$ of 52.3 dBA at 30 feet would result from 125 passenger vehicles traveling 25 mph along Flagler Lane (FHWA 2004). Should 125 vehicles drop off or pick-up passengers from the RCFE during the AM peak period, the resulting $L_{eq}$ at residences East of Flagler lane would be 60.1 dBA. Noise levels associated with passenger drop-off and pick-up via Flagler Lane were calculated to increase by 0.8 dBA, thus noise impacts would be imperceptible (i.e., less than 3 dBA) and *less than significant*.

*Outdoor Function Areas*

The outdoor dining spaces at the proposed RCFE Building constructed under the Phase 1 preliminary site development plan~~, including the dining terrace on the south side of the building, the porch on the south side of the building, and the larger dining terrace above the PACE services on the north side of the building,~~ would operate during the daytime hours and are expected to close by 10:00 p.m. The indoor and outdoor pools associated with the Aquatics Center would be located within the interior of the site, approximately 150 feet west of the nearest noise-sensitive residences along Flagler Alley (refer to Figure 2-11 through Figure 2-13). An $L_{eq}$ of 60 dBA associated with 100 people outdoor pool activities would result in a noise level of 50 $L_{eq}$ at the nearest sensitive

receptor, below the criteria of 55 $L_{eq}$ from 7:00 a.m. to 10:00 p.m. established in TMC Section 6-46.7.2.

It is anticipated that the majority of outdoor noise would be primarily generated during fitness classes and events (e.g., outdoor movie nights, farmer's markets, etc.) on the central lawn (refer to Figure 2-9). Noise associated with these areas is anticipated to include guests socializing, amplified music, and Public Address (PA) system announcements. Noise levels generated by fitness classes and events that would include amplified music and involve up to 200 people on the central lawn, may contribute to an increase in ambient noise levels in the vicinity of the Project site above existing levels. Noise levels generated by outdoor events that include live amplified music (e.g., three piece band with electric or amplified instruments), may generate maximum noise levels of over 100 dBA at 50 feet (~~Caltrans 1998~~Caltrans 2013). Acoustic accompaniments can generate maximum noise levels of 80 dBA at 1 foot and 46 dBA at 50 feet. However, maximum noise levels over 100 dBA at 50 feet would typically be associated with live amplified music from large concerts, such as rock concerts. An average loudspeaker comes with a sensitivity of approximately 88 dBA (Definitive Technology 2021). Therefore, amplified loudspeaker music associated with outdoor fitness classes on the central lawn is conservatively assumed to generate a maximum loudspeaker $L_{max}$ of 90 dBA at 45 feet. Without any amplified music, 200 people each talking at 60 dBA would result in noise level of 83 dBA $L_{eq}$ at 5 feet and 63 dBA $L_{eq}$ at 50 feet (Wood 2021). A majority of these events, such as the fitness classes and farmers' markets, would occur during the daytime hours; however, some community events (e.g., outdoor movie nights) would occur during evening hours until 10:00 p.m.

The central lawn would be oriented such that amplified sound would be directed towards the southwest, away from the nearby noise-sensitive receptors east of Flagler Lane and Flagler Alley. Residences east of Flagler Lane and Flagler Alley would be located approximately 450 feet away from the noise source (i.e., loudspeaker) during outdoor events (as measured from the center of the proposed lawn within the interior portion of the campus), which would result in a 20-dBA reduction based on attenuating distance. Based on a maximum loudspeaker $L_{max}$ of 90 dBA at 45 feet, the maximum noise level at receptors along Flagler Lane and Flagler Alley would be an $L_{max}$ of approximately 70 dBA (County of Santa Barbara 2016).

Noise from amplified music at the central lawn would not adversely affect ambient noise levels at the residences southwest of North Prospect Avenue, given the distance (approximately 400 feet from the center of the proposed lawn) and intervening structures between the noise source and residences along North Prospect Avenue. The attenuating distance of 400 feet from the residences along North Prospect Avenue would result in an 18-dB reduction and intervening buildings would

result in a 5-dBA reduction, for a combined reduction of 23 dBA from the $L_{max}$ of 90 dBA at 45 feet. Therefore, an $L_{max}$ of 67 dBA would be expected at residences along North Prospect Avenue. The projected maximum noise levels at residences along Flagler Lane and Flagler Alley (70 dBA) and North Prospect Avenue (67 dBA) would be equivalent to normal to elevated speech at a distance of 3 feet.

Elevated noise levels from outdoor events would vary throughout the year. During summer months, events held on the central lawn would be anticipated to occur more frequently, potentially with events or larger gatherings occurring almost every weekend. During winter months, it is anticipated that fitness classes and outdoor events would be less frequent due to the weather and instead would be hosted in the Wellness Center, Aquatics Center, or CHF. Implementation of MM NOI-3b would ensure noise levels from outdoor dining spaces, fitness classes, and community events do not occur after 10:00 p.m. consistent with RBMC Section 4-24.401 and TMC Section 6-46.7.2.

Disturbance from noise levels causing impacts to surrounding sensitive receptors from outdoor fitness classes and community events would be infrequent; however, given the potential for maximum noise levels of over 100 dBA at 50 feet (which would be attenuated to 80 dBA at the nearest sensitive receptor approximately 450 feet away) associated with live amplified music, operational noise impacts to nearby sensitive receptors are considered *potentially significant*. However, compliance with RBMC Section 4-24.401 and TMC Section 6-46.7.2, as well as the implementation of MM NOI-3b, which would require preparation of an Event Management Plan, would reduce noise impacts related to outdoor events to *less than significant with mitigation*. Additionally, MM NOI-3c would require the proposed Aquatics Center to close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria, which would further reduce operational noise impacts.

Mitigation Measures (MM)

To further reduce the noise levels resulting from operation of the proposed Project, the following mitigation measures would be implemented:

***MM NOI-3a*** ***Delivery Truck Hours and Idling.*** *Deliveries from heavy-duty trucks, including refrigerator trucks, trash and recycling pick-ups, and parking lot sweeping, shall be restricted to daytime operating hours (7:00 a.m. to 4:00 p.m.); idling longer than 5 minutes in the same period shall be prohibited.*

***MM NOI-3b*** ***Events Management Plan.*** *The Beach Cities Health District (BCHD) shall prepare an Event Management Plan, which shall include, but is not limited to, establishment*

*of procedures to limit noise generated by operations on the proposed BCHD Healthy Living Campus, particularly for outdoor events. The Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC). Limitations on outdoor events shall include prohibiting the use of amplification systems for outdoor events after 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria and review of the proposed sound system by a qualified acoustical engineer to ensure that event set ups would meet the acceptable exterior noise criteria of 50 to 55 A-weighted decibels (dBA) consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2.*

***MM NOI-3c*** ***Outdoor Pool Activities****. The Aquatics Center, specifically the outdoor pool and deck area would close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria.*

Residual Impacts

Implementation of MM NOI-3a would eliminate nighttime noise impacts associated with heavy-duty delivery trucks by limiting delivery operations to daytime operating hours (7:00 a.m. to 4:00 p.m.) and would reduce daytime noise impacts associated with heavy-duty delivery trucks by prohibiting idling longer than 5 minutes. Implementation of MM NOI-3b would substantially reduce operational noise associated with outdoor fitness classes and community events by requiring a qualified acoustical engineer ensure that event set ups would meet the acceptable exterior noise criteria of 50 to 55 dBA consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2. Implementation of MM NOI-3c would ensure Aquatic Center operations close by 10:00 p.m. With required compliance with RBMC Section 4-24.301 and TMC Section 6-46.7.2, as well as the implementation of MM NOI-3a, MM NOI-3b, and MM NOI-3c, impacts associated with proposed Project operations would be *less than significant*.

Cumulative Impacts

Construction of the proposed Project would occur at the same or similar time as other major construction projects identified in the cumulative projects list in Chapter 3.0.2, *Cumulative Impacts*. Tables 3.0-1, 3.0-2, 3.0-3, and 3.0-4 contain a list of pending, approved, and recently completed projects within the Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach, respectively (within 3 miles of the Project site). At least some of the cumulative projects in the vicinity of the Project site may have a construction schedule that overlaps with the anticipated construction schedule for the proposed Project. Cumulative impacts may include a temporary

increase in noise levels from site preparation and construction activities. Most noise generation from the proposed Project would occur during excavation, shoring, and foundation construction, and would be limited to approximately 3 months. The addition of construction worker traffic and, particularly, increased haul truck traffic associated with grading and hauling from the proposed Project combined with other cumulative projects would increase existing ambient noise levels in the area by approximately 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. Noise levels from construction activities are typically considered as point sources for noise generation and would decrease at a rate of 6 dBA per doubling of distance from the source over hard site surfaces. Further, noise levels would also slightly decrease is areas where buildings (and to a lesser extent trees) act as noise barriers; thus, it would be unlikely that noise from the cumulative projects would reach each other and combine to produce a cumulatively significant impact. Therefore, any cumulative impacts generated from the simultaneous construction of these projects would have a less than significant impact. It is also assumed that construction of these cumulative projects would be limited to daytime hours, consistent with RBMC and TMC restrictions. Therefore, the proposed Project *would not have a substantial contribution to cumulatively considerable construction-related noise impacts*.

Upon completion of the proposed BCHD Healthy Living Campus, long-term noise impacts associated with the operation of the proposed Project would result from outdoor uses and periodic outdoor events on the central lawn and Main Street promenade. However, the proposed campus would be required to comply with the Redondo Beach and Torrance Noise Regulations. Additionally, noise during events or large gatherings would be reduced through implementation of MM NOI-3b. Noise impacts associated with other cumulative development projects would be addressed on a case-by-case basis through compliance with the respective applicable noise regulations. Therefore, the proposed Project *would not have a substantial contribution to cumulatively considerable noise impacts*.

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## 3.12 POPULATION AND HOUSING

This section of the Environmental Impact Report (EIR) describes the existing population, employment characteristics, and the housing stock in Redondo Beach, Torrance, and Los Angeles County. The population and housing analysis evaluates the potential impacts to population, employment opportunities, and housing stock that could result from the implementation of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project), including the preliminary site development plan under Phase 1 as well as the more general development program under Phase 2. This analysis is based on data and projections provided by the U.S. Census Bureau and the Southern California Association of Governments (SCAG) as well as the Redondo Beach General Plan 2013-2021 Housing Element (City of Redondo Beach 2017) and Torrance General Plan 2014-2021 Housing Element (City of Torrance 2013).

### 3.12.1 Environmental Setting

The Project site is surrounded by single- and multi-family residences to the north, south, east, and west. The nearest single-family residences to the Project are located within West Torrance across from Flagler Lane and Flagler Alley, approximately 80 feet east of the Project site. The nearest multi-family residences to the Project site are located approximately 110 feet north of the vacant Flagler Lot across Beryl Street. The majority of the BCHD campus community consists of employees and campus visitors, including medical patients receiving outpatient care. However, the Silverado Beach Cities Memory Care Community provides 60 double occupancy Memory Care units that support an on-site resident population.

The following analysis includes a discussion of the existing residential population data, employment data, and housing stock for Redondo Beach, Torrance, and regionally for Los Angeles County.

<u>Population</u>

The U.S. Census Bureau provides official population and housing counts, which are often used by other agencies to develop their own estimates and projections. As part of its long-range planning, SCAG also projects anticipated population, employment data, and housing stock information for each jurisdiction in the SCAG planning region. The most recent projections were released in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Demographics & Growth Forecast (SCAG 2020b).

*U.S. Census*

U.S. Census data represents the official count of the entire U.S. population and is used as the baseline from which most demographic projections are calculated. The most recent U.S. Census was published in 2010.[1] The American Community Survey (ACS) is also conducted by the U.S. Census Bureau every year for a small sample of the population to provide current estimates for various social and economic characteristics of communities, including housing, education, jobs, etc. The ACS includes 1-, 3-, and 5-year estimates.

According to the 2010 U.S. Census data and the 2019 ACS 1-year estimate data profiles, Redondo Beach and Torrance have grown at a rate similar to Los Angeles County over the last 19 years (see Table 3.12-1). In the 2000 U.S. Census, the population of Redondo Beach was approximately 63,261 persons, the population of Torrance was approximately 137,964 persons, and the population of Los Angeles County was approximately 9,519,338 persons. Between 2000 and 2019, Redondo Beach experienced an estimated 5.51-percent increase in population and Torrance experienced an estimated 4.09-percent increase in population. Similarly, Los Angeles County experienced an estimated 5.46-percent increase in population from 2000 to 2019.

**Table 3.12-1. U.S. Census Total Population in 2000-2019**

| | 2000 | 2010 | 2019[1] | Net Increase from 2000-2019 |
|---|---|---|---|---|
| Redondo Beach | 63,261 | 66,748 | 66,749 | +3,488 (+5.51%) |
| Torrance | 137,946 | 145,438 | 143,592 | +5,646 (+4.09%) |
| Los Angeles County | 9,519,338 | 9,818,605 | 10,039,107 | +519,769 (+5.46%) |

Notes: 2019 population reflects estimated population based on observed and estimated population growth.
Sources: U.S. Census Bureau 2001, 2011, 2019.

*SCAG Integrated Growth Forecast*

SCAG is the federally designated Metropolitan Planning Organization[2] for Southern California, and includes the following six counties: Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura. Further, Redondo Beach, Torrance, and 14 other cities and unincorporated

[1] The 2020 census count ended in October 2020. The U.S. Census Bureau is currently conducting multiple surveys, including the Household Pulse Survey, the American Community Survey, and a survey to measure the accuracy of the 2020 census count (U.S. Census Bureau 2020).
[2] Metropolitan Planning Organization is a federally designated agency that allows local elected officials to provide input into planning and implementation of Federal transportation funds for metropolitan areas over 50,000 people (National Association of Regional Councils 2013).

regions within the Los Angeles County (i.e., Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Los Angeles, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates) are represented by the South Bay Cities Council of Governments (SBCCOG), which is a voluntary agency established to serve as a sub-regional organization to SCAG.

SCAG develops socioeconomic estimates including population, employment, and housing stock projections for cities in the SCAG region through enhanced forecasting methods and interactive public outreach. These estimates and projections provide the analytical foundations for SCAG's transportation planning and other programs at the regional and small geographic area level, including the Regional Housing Needs Assessment (RHNA). In May 2020, SCAG released the 2020-2045 RTP/SCS, Connect SoCal (SCAG 2020a), which contains SCAG's most recent regional Integrated Growth Forecast (Growth Forecast) (SCAG 2020b). The Growth Forecast represents the most likely growth scenario for Southern California in the future, considering a combination of recent and past trends, reasonable technical assumptions, and local or regional growth policies (see Table 3.12-2).

*SCAG consists of 15 subregions throughout the County. Redondo Beach, Torrance, and the Project site are located within the South Bay Cities region.*

**Table 3.12-2. SCAG Projected Population, Employment, and Households**

| City | Metric | 2016 | 2045 | Projected Increase (2016-2045) |
|---|---|---|---|---|
| Redondo Beach | Population | 68,200 | 72,900 | 6.9% |
| | Employment | 25,400 | 28,300 | 11.4% |
| | Housing Units | 29,200 | 31,100 | 6.5% |
| Torrance | Population | 147,100 | 153,100 | 4.1% |
| | Employment | 126,600 | 133,800 | 5.7% |
| | Housing Units | 55,600 | 57,300 | 3.1% |
| Los Angeles County | Population | 10,110,000 | 11,674,000 | 15.5% |
| | Employment | 4,743,000 | 5,382,000 | 13.5% |
| | Housing Units | 3,319,000 | 4,119,000 | 24.1% |

Source: SCAG 2020b.

Housing and Employment

The U.S. Census Bureau tracks the number of housing units, a metric that includes both occupied and vacant units. City- and county-wide occupied housing unit demographics are surveyed every 10 years as part of the decadal U.S. Census. As previously described, the ACS is also conducted by the U.S. Census Bureau every year for a small sample of the population to provide current estimates for various social and economic characteristics of communities, including housing, education, jobs, etc. The 2000 and 2010 decadal U.S. Census data as well as the 2018 ACS 5-year estimate data profiles[3] are provided below in Table 3.12-3 for the Redondo Beach, Torrance, and Los Angeles County.

As shown in Table 3.12-3, between 2000 and 2018 Redondo Beach has experienced a 1.48-percent increase in the total number of housing units. Torrance and Los Angeles County experienced slightly larger increases in the total number of housing units, approximately 4.14 percent and 7.75 percent, respectively. Redondo Beach experienced increases in the number of vacant units between 200 and 2018; however, Torrance and Los Angeles County experienced slight decreases in the number of vacant units during this period.

Housing stock is also reported on an annual basis by the California Department of Finance. Between 2010 and 2019, the California Department of Finance reported that the housing stock for Redondo Beach increased by 257 housing units (an increase of approximately 0.84 percent) from 30,609 to 30,866 units (California Department of Finance 2020). Similarly, between 2010 and 2019, the California Department of Finance reported that the housing stock for Torrance increased by 175 housing units (an increase of approximately 0.3 percent) from 58,377 to 58,552. During this time, the housing stock in Los Angeles County increased more substantially by 125,811 units (California Department of Finance 2020).

[3] The 5-year estimates are based on 60 months of collected data. This data based on a larger sample size than the 1-year and 3-year estimates and is suitable/reliable for areas with small populations (e.g., <20,000 people).

## Table 3.12-3. City- and County-wide Housing Occupancy and Tenure

| Housing Type | Redondo Beach | | | | City of Torrance | | | | Los Angeles County | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 2000 | 2010 | 2018 | Percent Change | 2000 | 2010 | 2018 | Percent Change | 2000 | 2010 | 2018 | Percent Change |
| Total Units: | 29,543 | 30,609 | 29,979 | 1.48% | 55,967 | 58,377 | 58,283 | 4.14% | 3,270,909 | 3,445,076 | 3,524,321 | 7.75% |
| Occupied Units: | 28,566 | 29,011 | 27,621 | -3.31% | 54,542 | 56,001 | 54,360 | -0.33% | 3,133,774 | 3,241,204 | 3,306,109 | 5.50% |
| Owner-occupied Units | 14,140 | 14,917 | 13,949 | -1.35% | 30,533 | 31,621 | 30,063 | -1.54% | 1,499,744 | 1,544,749 | 1,514,629 | 1.00% |
| Average Household Size | 2.37 | 2.47 | 2.58 | +0.21 | 2.68 | 2.70 | 2.75 | +0.07 | 3.13 | 3.16 | 3.19 | +0.03 |
| Renter-occupied Housing Units | 14,426 | 14,094 | 13,672 | -5.23% | 24,009 | 24,380 | 24,297 | +1.20% | 1,634,030 | 1,696,455 | 1,719,480 | 5.23% |
| Average Household Size | 2.05 | 2.09 | 2.31 | +0.26 | 2.29 | 2.42 | 2.57 | +0.28 | 2.85 | 2.81 | 2.84 | -0.01 |
| Vacant Units: | 977 | 1,598 | 2,358 | 141.35% | 1,425 | 2,376 | 3,923 | 175.30% | 137,135 | 203,872 | 218,212 | 59.12% |
| Homeowner Vacancy Rate | 1.2% | 0.9% | 1.2% | 0% | 1.0% | 0.8% | 0.7% | -0.3% | 1.6% | 1.7% | 1.0 | -0.6% |
| Rental Vacancy Rate | 2.6% | 5.3% | 4.0% | +1.4% | 2.4% | 5.3% | 2.5% | +0.1% | 3.3% | 5.8% | 3.2 | -0.1% |

Notes: The percent change has been calculated for the 8-year period between 2000 and 2018.
Sources: U.S. Census Bureau 2001, 2011, 2018a.

Housing units in Redondo Beach are spread throughout much of the City, with the exception of coastal commercial areas located directly adjacent to the harbor and pier, other regional commercial areas at the eastern end of the City, and a large industrially zoned area within the northernmost portion of the City. Detached single-family dwellings are the predominant type of residence, although multi-family units are concentrated within some residential neighborhoods, particularly in North Redondo Beach and further west near the coastline. Multi-family residential units are dispersed throughout Torrance, mainly west of the north-southbound State Route (SR-) 107 and particularly near commercial districts. West Torrance is dominated by single-family residential units.

Housing costs make up a large portion of total mean annual household expenses within Redondo Beach and Torrance. Based on the 2018 ACS 5-year estimate data profiles, median gross rent is $1,987 per month in Redondo Beach and $1,672 per month in Torrance (U.S. Census Bureau 2018a). Median homeowner costs in Redondo Beach are $3,299 per month for owners with a mortgage and $656 per month for those without a mortgage (U.S. Census Bureau 2018a). Median homeowner cost for residents in Torrance are $2,803 per month for those with a mortgage and $573 per month for those without a mortgage (U.S. Census Bureau 2018a). The 2018 median home sale price[4] is $1,100,000 in Redondo Beach and $705,000 in Torrance (SCAG 2019a, 2019b). For 2017, housing costs in Redondo Beach accounted for an average of 25.9 percent of renters' total household income and 31 percent of household income for renters in Torrance (SCAG 2019a, 2019b). Homeowners spent slightly less for housing as a percentage of income, paying approximately 24.7 percent of their total household income on housing costs in Redondo Beach and 22.4 percent in Torrance (SCAG 2019a, 2019b).

*SCAG Regional Housing Needs Assessment*

As previously described, the RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The 5th Cycle RHNA Allocation Plan, which covers the planning period from October 2013 to October 2021, provided projections for the expected number of households in Redondo Beach and Torrance to the year 2040 and was adopted by the Regional Council on October 4, 2012 (SCAG 2012). According to SCAG's projections, the number of households in Redondo Beach was expected to grow from 29,000 in 2012 to an estimated 33,000 in 2040, representing a 13.8-percent increase. Similarly, the number of households in the Torrance was expected to grow from 56,100 to 62,000 from 2012 to 2040, representing a 10.5-percent

[4] Median home sales price reflects resale of existing homes, which varies due to type of units sold.

increase. SCAG uses these projections to forecast the number of housing units that will be needed for the region.

SCAG determines the housing growth needs for municipalities within its jurisdiction, which includes Redondo Beach and Torrance, and publishes these determinations in the RHNA. The purpose of the RHNA is to anticipate population growth, so that collectively the region and subregions produce sufficient housing to meet future population needs and to address social equity, with each jurisdiction providing its fair share to meet housing needs consistent with the State Housing Element Law (Government Code Sections 65580-65589). State Housing Element Law requires cities to update their Housing Element every 8 years at a minimum and amend their general plans and zoning ordinances, as necessary, to accommodate the number of units in the RHNA. (The RHNA does not require a local jurisdiction to build the number of housing units that it projects, although sufficient opportunity must be provided to do so.)

~~SCAG is in the process of developing the~~ The 6th Cycle Final RHNA Allocation Plan~~, which~~ will cover the planning period October 2021 through October 2029. The ~~Draft~~ 6th Cycle Final RHNA allocates ~~2,483~~2,490 housing units to Redondo Beach for the 2021-2029 RHNA planning period, of which ~~933~~936 new units are designated as units for households with very-low income levels (SCAG 2020~~b~~c). SCAG allocated ~~4,928~~4,939 housing units to Torrance, ~~1,617~~1,621 of which are designated for very-low income households (SCAG 2020c). As required by State Housing Law, both cities are in the process of updating their General Plan Housing Elements to accommodate the allocated units and plan for future population growth. As a special district dedicated to public healthcare, BCHD is not subject to the RHNA and is not required by State Housing Element Law to plan for residential units on its campus.

Employment and Labor

According to the 2018 ACS 5-year estimate data profiles, which provides the most recently available data on employment, in 2018 the labor forces within Redondo Beach and Torrance were estimated at a total of 54,672 and 119,753 persons, respectively (see Table 3.12-4). Of the labor force within Redondo Beach, 37,496 persons (68.9 percent) were employed and 1,740 persons (3.2 percent) were unemployed (U.S. Census Bureau 2018b). Of the labor force within Torrance 72,573 persons (60.6 percent) were employed and 3,505 persons (2.9 percent) were unemployed (U.S. Census Bureau 2018b).

**Table 3.12-4. City- and County-wide Employment Statistics (2018) (5-Year Estimate)**

| Labor Force Status | Redondo Beach | | Torrance | | Los Angeles County | |
|---|---|---|---|---|---|---|
| | Persons | Percent | Persons | Percent | Persons | Percent |
| Population Over 16 | 54,672 | 100% | 119,753 | 100% | 8,115,158 | 100% |
| Population in Labor Force[1] | 39,434 | 72.1% | 76,147 | 63.6% | 5,230,394 | 64.5% |
| Civilian Labor Force | 39,236 | 71.8% | 76,078 | 63.5% | 5,226,836 | 64.5% |
| Employed | 37,496 | 68.6% | 72,573 | 60.6% | 4,869,658 | 60% |
| Unemployed | 1,740 | 3.2% | 3,505 | 2.9% | 357,178 | 4.4% |
| Armed Forces | 198 | 0.4 % | 69 | <0.1% | 3,558 | <0.1% |
| Not in Labor Force | 15,238 | 27.9% | 43,606 | 36.4% | 2,884,764 | 35.5% |
| Unemployment Rate | 4.4% | | 4.6% | | 6.8% | |

Notes: [1] *"Population in Labor Force"* is defined by the U.S. Census Bureau and includes all people classified in the civilian labor force, plus members of the U.S. Armed Forces (people on active duty with the U.S. Army, Air Force, Navy, Marine Corps, or Coast Guard).
Source: U.S. Census Bureau 2018b.

*Jobs-to-Housing Ratio*

The jobs-to-housing ratio in a jurisdiction is an overall indicator of both availability of jobs within an area, providing residents with an opportunity to work locally, and availability of housing, providing employees with adequate housing opportunities. A lower job-to-housing ratio may indicate an imbalance between housing options and the type and amount of locally available jobs, while larger job-to-housing ratios may indicate that an area is a job-importer which employees are non-residents. There is adequate housing to accommodate the labor market in a city when the jobs-to-housing ratio is close to 1.0. Based on the 2018 ACS 5-year estimate data profiles, the job-to-housing ratios in Redondo Beach and Torrance were approximately 1.31, or approximately 1.31 jobs per housing unit (U.S. Census Bureau 2018a, 2018b). (It should be noted that while a city may have an equal number of jobs and housing units, this does not mean that the persons employed in a city can afford to live in that city. Additionally, this metric does not account for the location of the job.)

Based on the Monthly Labor Force Data for Cities and Census Designated Places, which provides a 2020 estimate to supplement the 2018 data presented in Table 3.12-4 above, businesses within Redondo Beach provide approximately 33,500 jobs for a labor force of 38,700, while Torrance provides approximately 67,700 jobs for a labor force of 73,700 (Employment Development Department 2020). Approximately 9.4 percent of the residents within Redondo Beach and 22.4 percent of the residents within Torrance work in the cities in which they live, meaning the majority of residents commute to other cities for work (SCAG 2019a, 2019b). Table 3.12-5 lists the top 10 cities of employment for residents of Redondo Beach and Torrance (SCAG 2019a, 2019b). The

average commute time for residents is approximately 30 minutes, with most commuters (79.1 percent from Redondo Beach and 88.8 percent from Torrance) driving themselves (SCAG 2019a, 2019b). Approximately 5.2 percent of commuters from Redondo Beach and 7.5 percent commuters from Torrance carpooled with others in 2019 (SCAG 2019a, 2019b). In both cities, less than 3 percent of commuters used public transportation (SCAG 2019a, 2019b).

**Table 3.12-5. Top 10 Cities of Employment for Residences within the City of Redondo Beach and the City of Torrance (2019)**

| City Ranking | | Number of Commuters | Percent of Total Commuters |
|---|---|---|---|
| **Redondo Beach** | | | |
| 1 | Los Angeles | 7,633 | 25.6% |
| 2 | Torrance | 3,036 | 10.2% |
| 3 | El Segundo | 2,834 | 9.5% |
| 4 | Redondo Beach | 2,803 | 9.4% |
| 5 | Manhattan Beach | 1,094 | 3.7% |
| 6 | Santa Monica | 887 | 3.0% |
| 7 | Hawthorne | 624 | 2.1% |
| 8 | Culver City | 597 | 2.0% |
| 9 | Burbank | 587 | 2.0% |
| 10 | Long Beach | 587 | 2.0% |
| All Other Destinations | | 9,112 | 30.6% |
| **Torrance** | | | |
| 1 | Torrance | 13,132 | 22.4 % |
| 2 | Los Angeles | 12,660 | 21.6 % |
| 3 | El Segundo | 3,747 | 6.4 % |
| 4 | Long Beach | 2,385 | 4.1 % |
| 5 | Redondo Beach | 2,296 | 3.9 % |
| 6 | Carson | 1,549 | 2.6 % |
| 7 | Gardena | 1,220 | 2.1 % |
| 8 | Manhattan Beach | 1,086 | 1.9 % |
| 9 | Hawthorne | 931 | 1.6 % |
| 10 | Irvine | 762 | 1.3 % |
| All Other Destinations | | 18,871 | 32.2 % |

Sources: SCAG 2019a, 2019b.

*Existing Project Site Employment and Housing*

As previously described, BCHD provides health and wellness services for children, adults, and seniors in the Beach Cities and surrounding areas. The majority of the existing campus community

is transient in nature, consisting of BCHD and tenant employees that arrive on campus during the morning and leave the campus in the evening as well as patients arriving to and departing from the campus throughout the day. BCHD employees and tenant employees on the campus include approximately 180 medical professionals, caregivers, housekeeping, maintenance, and other miscellaneous staff (BCHD 2020). The resident population on the campus is limited to the residents of Silverado, which provides 60 double occupancy apartment style units (i.e., 120 beds).

### 3.12.2 Regulatory Setting

This section summarizes relevant local regulations that pertain to population, employment, or housing stock within Redondo Beach and Torrance.

City of Redondo Beach Policies and Regulations

*Redondo Beach General Plan 2013-2021 Housing Element*

The Redondo Beach General Plan 2013-2021 Housing Element establishes goals, policies, and implementation measures to specifically identify ways in which the housing needs of the existing and future resident population can be met. The Housing Element also establishes building requirements for mixed-use residential developments in mixed-use and regional commercial land use designations, and to enhance and promote pedestrian-oriented character of the commercial component and the neighborhood. The Housing Element relies entirely on existing zoned residential and mixed-use properties to accommodate the City's required RHNA and notes future residential development in Redondo Beach most likely will occur on underutilized lots where developments are not built out to the maximum density permitted. No land use changes, rezoning, or upzoning are necessary to provide adequate sites to accommodate the RHNA. The Housing Element includes a Housing Plan to set goals, policies, and programs to fulfill the housing needs of the community. The Housing Element identifies seniors as a housing special needs group more likely to face difficulty finding affordable housing. Goals and policies relevant to the proposed Project include:

Goal 1.0: Maintain and enhance the existing viable housing stock and neighborhoods within Redondo Beach.

Goal 2.0: Assist in the provision of housing that meets the needs of all economic segments of the community.

Goal 3.0: Provide suitable sites for housing development which can accommodate a range of housing by type, size, location, price, and tenure.

Policy 3.1 Implement land use policies that allow for a range of residential densities and products, including low-density single-family uses, moderate-density townhomes, and higher-density apartments, condominiums, and units in mixed-use developments.

Policy 3.4 Encourage compatible residential development in areas with recyclable or underutilized land.

Policy 3.5 Allow flexibility within the City's standards and regulations to encourage a variety of housing types.

Goal 5.0: Continue to promote equal housing opportunity in the City's housing market regardless of age, race, color, sex, marital status, familial status, national origin, ancestry, religion, sexual orientation, source of income or any other arbitrary factors.

Policy 5.2 Provide equal access to housing for special needs residents such as the homeless, elderly, and disabled.

City of Torrance Local Policies and Regulations

*Torrance General Plan 2014-2021 Housing Element*

State law requires jurisdictions to periodically update their Housing Elements to be in compliance with changes in housing laws, reflect population trends, demonstrate that the RHNA can be satisfied and prepare goals, policies, programs and quantified objectives to further the development, improvement, and preservation of housing. In 2013, the City of Torrance adopted updates to the Housing Element for the 2014-2021 planning period, with the purpose of providing a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. The Housing Element includes several programs designed to conserve, preserve, and improve the existing housing stock, encourage the development of more mixed use, multifamily and affordable housing opportunities, reduce governmental constraints to housing production and affordability, and promote equal housing opportunities. The Housing Element objectives and policies relevant to the proposed Project include:

Objective H.1: Enhance housing opportunities for all Torrance residents.

Policy H.1.1 Provide a range of different housing types and unit sizes for varying income ranges and lifestyles.

Policy H.1.2 Encourage the provision for housing which meets the needs of seniors and the disabled.

Policy H.1.3 Continue to implement the Senior Citizen Housing Development Standards.

Policy H.1.4 Continue to monitor and assess the special housing needs of senior citizens, in collaboration with the Torrance Commission on Aging.

Objective H.2 Assist in the provision of adequate housing to meet the needs of the community.

Policy H.2.2. Work with large employers to facilitate the development of workforce housing.

Objective H.4: Maintain and improve the quality of existing housing and residential neighborhoods in Torrance.

Policy H.4.1 Encourage the maintenance and enhancement of the existing housing stock.

Policy H.4.3 Support preservation of existing affordable low-income housing that is considered at risk of converting to market level rents.

Policy H.4.4 Encourage the rehabilitation of residential properties by homeowners and property owners.

### 3.12.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 California Environmental Quality Act (CEQA) Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on population and housing if it would:

a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure); and/or

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

*Screened-Out Threshold(s):*

- Threshold (b) (*Displacement of Existing People or Housing*): The Silverado Beach Cities Memory Care Community, which is located in the Beach Cities Health Center (514 North Prospect Avenue), currently provides 60 double occupancy Memory Care units that support an on-site resident population. The implementation of the proposed BCHD Healthy Living Campus Master Plan would not remove or displace any housing or residential areas on campus. Instead, the existing Beach Cities Health Center, including the Silverado Beach Cities Memory Care Community, would remain in place during construction activities associated with the Phase 1 preliminary site development plan. Following the completion of Phase 1, the existing 60 double occupancy Memory Care units would be relocated from the Beach Cities Health Center to the newly constructed RCFE Building. Therefore, for the reasons stated above and as discussed in Section XIV, *Population and Housing* of the Initial Study (IS), this issue is not further analyzed in the EIR.

Methodology

Potential impacts on population and housing associated with the proposed Project were analyzed using population and housing data from the U.S. Census Bureau and SCAG as well as the Redondo Beach General Plan 2013-2021 Housing Element (City of Redondo Beach 2017) and Torrance General Plan 2014-2021 Housing Element (City of Torrance 2013), which describe the local housing goals, policies, objective and programs. Average housing prices were derived for Redondo Beach Torrance from the U.S. Census Bureau's ACS data for monthly median housing costs. Additional population from residential housing projects was estimated based on the U.S. Census Bureau's estimate of persons per household in Redondo Beach and Torrance. The analysis also considers the general effect on the jobs-to-housing ratio for each city. Potential related impacts of population and employment growth on issues such as public services and transportation are described in Section 3.13, *Public Services* and Section 3.14, *Transportation*.

### 3.12.4 Project Impacts and Mitigation Measures

Impact Description (PH-1)

*a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure); and/or*

**PH-1** **The proposed Residential Care for the Elderly (RCFE) Building would provide a total of 217 on-site residential units, including 60 replacement Memory Care units and 157 new Assisted Living units. Additionally, the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would create a total of approximately 170 new jobs on the campus. However, the anticipated increase in population within Redondo Beach, Torrance, and the surrounding cities would be minor and well within the forecasted population growth for the region. The proposed Project would not induce substantial population growth and impacts would be *less than significant*.**

*Temporary Construction-Related Housing Needs*

Construction activities associated with the proposed Project would temporarily employ between 60 and 260 construction workers. An average of 210 construction workers would be on-site throughout the 29-month duration of Phase 1 construction and an average of 130 construction workers would be on-site during the 28-month duration of Phase 2 construction. However, these individuals would likely be drawn from the existing labor force within Los Angeles County and would not be expected to relocate to Redondo Beach or Torrance. If construction workers were drawn from outside of Los Angeles County, it is likely that these construction workers would rent or lease temporary accommodations (e.g., long-term, low-cost hotels or rental units) in nearby cities with a lower cost of living (see Table 3.12-7). Therefore, while the proposed Project would provide construction jobs, any incremental increase in housing demand induced during the Phase 1 or Phase 2 construction activities would be temporary and negligible in comparison to the overall regional supply within Los Angeles County.

*On-Campus Assisted Living and Memory Care Housing*

Implementation of the proposed Project would replace the 60 existing Memory Care units from the existing Beach Cities Health Center in the proposed RCFE Building constructed during Phase 1. Similar to existing conditions, the replacement Memory Care units would also be double occupancy units that would continue to provide housing for up to 120 people. Therefore, the proposed relocation of the 60 Memory Care units would not change the current baseline conditions on the campus and would have no net impact on the resident population on the campus.

**Table 3.12-6. Assisted Living Apartment Occupancy**

| Unit Type | Units | Beds |
|---|---|---|
| **Assisted Living** | | |
| Studio Unit | 37 | 37 |
| Single-Bedroom Unit | 70 | 70 |
| Single-Bedroom + Den Unit | 30 | 30 |
| Two-Bedroom Units | 20 | 40 |
| **Total Units** | **157** | **177** |

The 157 new Assisted Living units would consist of 37 studios, 70 one-bedroom units, 30 one-bedroom units with dens, and 20 two-bedroom units (refer to Table 3.12-6). Together, the proposed 157 new Assisted Living units would provide for approximately 177 new residents on the campus within Redondo Beach.

As previously described, Redondo Beach has an estimated population of 66,749 and 30,866 housing units according to the California Department of Finance. Assuming 100 percent occupancy of the 157 new Assisted Living units, implementation of the proposed Project would increase the population of Redondo Beach by less than 1 percent (i.e., 0.3-percent increase); therefore, the maximum population increase would be negligible. (It should also be noted that this estimate is conservative given that the market studies prepared for the proposed Project indicate that at a proportion of the Assisted Living residents would come from the existing and future populations of Redondo Beach.) Even with the conservative assumption that all residents of the proposed 157 new Assisted Living units currently live alone within Redondo Beach and that their homes would be occupied by new residents at an average rate of 2.34 persons per dwelling unit. this would create a maximum population increase of approximately 367, which would still be less than 1 percent (i.e., 0.55 percent) increase of the Redondo Beach population. This minor increase in population would be consistent with and well within SCAG's growth projections, which estimate the population Redondo Beach would increase by approximately 6.9 percent by 2045 (refer to Table 3.12-2).

The provision of new housing units for senior citizens requiring additional care and living assistance is a primary objective of the proposed Project. The creation of 157 Assisted Living units is consistent with the Redondo Beach General Plan Housing Element, which aims to enhance existing housing stock and expand housing opportunities for residents. For example, the proposed Project would be consistent with Policy 5.2, which specifically aims to provide housing that meets the special needs of seniors and the disabled (refer to Section 3.12.2, *Regulatory Setting*). The Project is also consistent with the objectives of the Torrance General Plan; for example, the

proposed Project would be consistent with Policy H.1.2 which encourages the provision for housing which meets the needs of seniors and the disabled. (Refer to Section 3.10, *Land Use and Planning* for further discussion of the proposed Project's consistency with State and local regulatory policies.)

Further, the proposed Project would redevelop the existing campus, which is located within a well-established, urbanized area that is already served by existing roads and infrastructure. While construction of the proposed Project would result in the construction of new curb cuts and driveways along Flagler Lane (refer to Section 2.5.1.3, *Proposed Access, Circulation, and Parking*) as well as new utilities connections (refer to Section 2.5.1.4, *Utilities and Services*), the proposed Project would not require the creation of new roads or other infrastructure that would induce new development and population growth beyond the proposed Project (see Section 3.15, *Utilities and Service Systems*).

*Long-term Employment-related Housing Needs*

As previously described in Section 3.12.1, *Environmental Setting*, BCHD employees and tenant employees on the existing campus include approximately 180 medical professionals, caregivers, housekeeping, maintenance, and other miscellaneous staff (BCHD 2020). Development of the proposed Project, including the preliminary site development plan under Phase 1 as well as the development program under Phase 2, is expected to create approximately 170 new jobs at the campus. Therefore, the proposed Project would increase the total number of jobs in Redondo Beach from a baseline of 33,500 to 33,670, an 0.5-percent increase in the total number of local jobs. (It should be noted that this increase in jobs would be spread over a considerable period of time given the phased construction.) This overall increase in local jobs would be negligible when considering effects on population and housing is well within and consistent with the SCAG's projected population growth of 4,700 individuals in Redondo Beach and 6,000 individuals in Torrance from 2016 to 2045 (refer to Table 3.12-2).

The jobs created by the proposed Project would predominantly include trained or service type jobs such as health care professionals (e.g., dietitian, physical therapist, occupational therapist, recreation therapist, etc.) as well as administrative, dining services, and housekeeping and maintenance staff. The average salary for health care professionals in the Los Angeles area ranges from approximately $60,000 to $190,000 per year (GlassDoor 2020). The average salary for the service and assisted living industry in the Los Angeles area ranges from approximately $25,000 to $46,000 per year, or $2,083 to $3,833 per month (GlassDoor 2020). Based on the 2018 ACS 5-year estimate data profiles, annual median housing costs are approximately $23,844 (i.e., $1,987 per month) for renter-occupied housing and approximately $39,588 (i.e., $3,299 per month) for

owner-occupied housing in Redondo Beach (U.S. Census Bureau 2018a). Annual median housing costs are $20,064 (i.e., $1,672 per month) for renter-occupied housing and $33,636 (i.e., $2,803 per month) for owner-occupied housing costs in Torrance (U.S. Census Bureau 2018a). This means housing costs in Redondo Beach would range from approximately 52 percent to 95 percent of an average service employee's annual income for rental housing and 86 percent to over 100 percent for an average mortgage. Housing costs in Torrance would range from approximately 44 percent to 80 percent of an average service employee's annual income for rental housing and 73 percent to more than 100 percent for an average mortgage. For most service and assisted living industry employees associated with the proposed Project, average housing prices – including both rental and home ownership costs – in the Redondo Beach and Torrance would be unaffordable based on the estimated salary range of $25,000 to $46,000 per year alone.

Nevertheless, as previously described, 9.4 percent of Redondo Beach residents and 22.4 percent of Torrance residents live and work in the same city. Applying these existing trends, approximately 16 of the 170 new employees would live in Redondo Beach, which could be easily accommodated by the available housing stock of 2,358 units (SCAG 2019a). Further, approximately 38 of the new 170 employees would live in Torrance, which would also be easily accommodated by the available housing stock of 3,923 units (SCAG 2019b).

Potential increases in the low- and moderate-income workforce within Redondo Beach and Torrance could incrementally increase the demand for affordable housing within these cities. However, many employees associated with the proposed Project would likely seek more affordable housing units in nearby cities, such as Hawthorne, Gardena, Inglewood, or Lomita. The U.S. Census Bureau data indicates that there are approximately 14,474 vacant units in the 10 nearby cities listed in Table 3.12.-7, with an average commute time of 5 to 40 minutes, depending on time of departure and traffic patterns. As described below in Table 3.12-7, median gross rent for nearby areas range from $1,118 in Hawthorne to $2,499 in Manhattan Beach. For example, based on the estimated salary range of $25,000 to $46,000 per year ($2,083 to $3,833 per month), housing costs in Hawthorne would range from approximately 29 to 54 percent of an average service employee's annual income with an average travel time of 15 to 35 minutes to the campus. For Gardena, housing costs would range from approximately 32 percent to 60 percent of an average service employee's annual income with an average travel time of 20 to 35 minutes. With the available housing stock in nearby areas, it can be concluded that sufficient housing opportunities that constitute a lower percentage of estimated service employee salaries are available within a reasonable commute distance to the campus (see Table 3.12-8).

**Table 3.12-7. Housing Availability and Price Near the City of Redondo Beach**

| City | Average Travel Time to the BCHD Campus | Population | # Vacant Housing Units | Median Gross Monthly Rent |
|---|---|---|---|---|
| Carson | 10-20 minutes | 91,394 | 644 | $1,464 |
| El Segundo | 20-40 minutes | 16,610 | 336 | $1,785 |
| Gardena | 20-35 minutes | 59,329 | 822 | $1,252 |
| Hawthorne | 15-35 minutes | 86,068 | 1,375 | $1,188 |
| Hermosa Beach | 10-15 minutes | 19,320 | 1,070 | $2,143 |
| Inglewood | 20-45 minutes | 108,151 | 1,750 | $1,267 |
| Lomita | 15-35 minutes | 20,320 | 353 | $1,335 |
| Manhattan Beach | 10-25 minutes | 35,183 | 1,843 | $2,499 |
| Redondo Beach | <5 minutes | 67,412 | 2,358 | $1,987 |
| Torrance | 5-20 minutes | 145,182 | 3,923 | $1,672 |

Notes: *"Average Travel Time to the City of Redondo Beach"* assumes vehicular travel and provides a range of commute time to account for employees traveling during and outside of rush hour.
Source: U.S. Census Bureau 2018.

Overall, the anticipated increase in population within Redondo Beach, Torrance, and the surrounding cities would be minor and well within the forecasted population growth for the region. Additionally, this increase in population could be accommodated by the existing housing stock in the region. Therefore, potential impacts on population and housing associated with Phase 1 and Phase 2 of the proposed Project would be *less than significant*.

Cumulative Impacts

As described in Table 3.0-1, Table 3.0-2, Table 3.0-3, and Table 3.0-4, in Section 3.0.2, *Cumulative Impacts*, there are several pending, approved, and recently completed development projects in the Redondo Beach and Torrance as well as in the neighboring Hermosa Beach and Manhattan Beach. These projects include infrastructure improvements, a day care center, a supermarket, office buildings, commercial facilities, public facilities, and residential developments. The infrastructure and public facilities improvements described in Section 3.0.2, *Cumulative Impacts* could result in temporary construction-related housing needs, but would not result in substantial permanent job creation or associated permanent increases in housing demand.

New permanent jobs created by the proposed Project and other projects in the region have the potential to increase local populations and increase competition for housing in the region. However, nearby proposed commercial developments would largely create retail and service type jobs that are likely to be filled by those that already live or work in the local area. For example, the South Bay Galleria is anticipated to generate a net increase of 925 employees. However, given

the retail nature of this cumulative project, these employees are expected to be drawn from the local community, similar to the proposed Project. As such, the Final EIR for the South Bay Galleria (State Clearinghouse [SCH] No. 2015101009) determined that the proposed Project would have a less than significant cumulative impact on the population and housing in the region. The Skechers Design Center and Office Project is anticipated to generate the greatest employment-related increase in housing demand in the Beach Cities, adding 430 new jobs in Hermosa Beach and 225 new jobs in Manhattan Beach. The Final EIR for the Skechers Design Center and Executive Offices (SCH No. 2015041081) analyzed the cumulative impacts that would result from an increase of 1,241 jobs associated with the Skechers Design Center and Offices and other cumulative projects in each city. The EIR concluded that cumulative impacts to Hermosa Beach and Manhattan Beach would be less than significant because there are more than enough vacant housing units to accommodate the increase in new residents from this project and other cumulative projects. The proposed Project would result in an increase of 170 jobs and would similarly have a less than significant impact on population and housing (refer to Impact PH-1), particularly given that many of the new service and Assisted Living industry employees would likely be drawn from the existing Redondo Beach, Torrance, and the surrounding South Bay communities. The potential increase in population associated with the proposed Project could easily be accommodated by the existing housing stock in Redondo Beach and Torrance, which includes a total of 6,281 units. This would leave a substantial number of leftover units to accommodate near-term housing needs associated with the other cumulative projects described in Section 3.0.2, *Cumulative Impacts*. The number of vacant units within the nearby cities is even greater and would provide greater affordability options.

While the proposed Project would involve an increase in permanent employment, given the nature of these service and Assisted Living industry jobs as well as the location of the campus within a well-established, urbanized community with available housing stock, the proposed Project *would not substantially contribute to a cumulatively considerable impact* related to unanticipated population growth.

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## 3.13 PUBLIC SERVICES

The following section of the Environmental Impact Report (EIR) describes the existing public services within Redondo Beach and Torrance and assesses the potential for the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) to affect existing service ratios, response times, or other performance objectives. The impact analysis provided in this section address the potential physical impacts associated with new or physically altered facilities necessary to maintain these performance objectives.

Existing public services provided by the City of Redondo Beach and the City of Torrance include but are not limited to fire protection, police protection, public schools, parks and recreational facilities, and libraries. Given the nature of the residential components included in the Phase 1 preliminary site development plan (i.e., Assisted Living and Memory Care), the Initial Study (IS) prepared for the proposed Project determined that the proposed Project would have no potential to impact public schools, parks and recreational facilities, or libraries (see Appendix A). As concluded in Section X, *Public Services* of IS, the proposed development of 157 new Assisted Living units for use by the elderly would not result in increased enrollment within the Redondo Beach Union School District or the Torrance Union School District because the Project would not increase the local population of school-age children. The development of 157 new Assisted Living units would also not result in an increased need for library services, resources, and facilities. As discussed in Section 3.12, *Population and Housing*, it is anticipated that new employees would be drawn from the South Bay region and therefore, would not substantially increase the demand for public libraries. Regarding recreation, new Assisted Living residents would generally utilize the active green space and health facilities provided on the BCHD campus, with outdoor areas open to the public, such that the proposed Project would not require the construction or expansion of new recreational facilities. (Impacts to bicycle paths and pedestrian connectivity are discussed in Section 3.14, *Transportation*.) Therefore, impacts due to new or physically altered public schools, libraries, and parks, are not discussed further in the EIR. For information regarding public utilities including potable water, wastewater, and solid waste, refer to Section 3.15, *Utilities and Service Systems*.

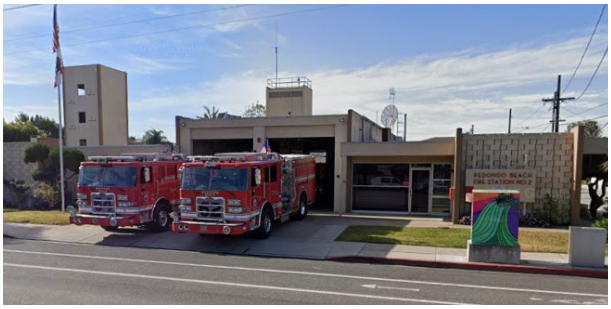
This section focuses on the potential impacts related to the need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for Fire Protection and Police Protection. The discussion of Fire Protection services includes a description of the facilities and resources for fire prevention and suppression in Redondo Beach and Torrance, emergency medical services (EMS), and special non-emergency

services. The discussion of Police Protection includes a description of the services and facilities related to police protection in Redondo Beach and Torrance.

### 3.13.1 Environmental Setting – Fire Protection

Redondo Beach Fire Department Assets

The Redondo Beach Fire Department (RBFD) provides fire protection, EMS, and special services (e.g., hazardous material management) as well as non-emergency services (e.g., building inspections and public education) to a population of over 66,000 in Redondo Beach. The RBFD maintains three fire stations strategically located within the City. Fire Station No. 1 is the Headquarters Station for Fire Administration and Fire Prevention Bureau located at 401 S. Broadway, approximately 1.2 miles southwest of the Project site. Fire Station No. 2 is located at 2400 Grant Avenue, approximately 1.1 miles northeast of the Project site, and Fire Station No. 3, which serves as the base for the City's Marine Harbor Patrol Division, is located at 280 Marina Way, approximately 1.1 miles west of the Project site.



*Fire Station No. 2 (pictured above) is located approximately 1.1 miles from the Project site. The RBFD provides fire protection, emergency medical response, and other special services to the population of Redondo Beach.*

RBFD personnel include one fire chief, three fire division chiefs, 13 fire captains, six firefighters, 12 fire engineers, 21 fire paramedics, three deputy harbor masters, three harbor patrol officers, and one hazardous materials inspector. RBFD assets include three fully staffed fire engines, one 100-foot ladder truck, two paramedic units, one hazardous materials response unit, one marine rescue/harbor patrol vessel, one fire boat, and one light/air support vehicle (City of Redondo Beach 2020d).

Torrance Fire Department Assets

The Torrance Fire Department (TFD) provides fire protection and EMS, hazardous materials mitigation, basic and technical rescue, domestic preparedness planning and response, community risk reduction, public fire and life safety education and fire investigation services to a population of over 143,000 in Torrance (see Section 3.12, *Population and Housing*). TFD also provides community safety, environmental protection, and property conservation through its seven divisions: Administration, Communication and Public Affairs, Community Risk Reduction, Emergency Medical Services, Emergency Response and Training, Organizational Planning and

Support Services. TFD divides the City of Torrance into six geographical planning zones, which are also commonly referred to as *"first-ins."* These planning zones range in size from 1.92 square miles to 4.77 square miles and are each served by one of the City's six fire stations. Fire Station No. 5 is located nearest to the Project site at 3940 Del Amo Boulevard, approximately 1.4 miles southeast of the Project site.

TFD resources include seven engine companies, two tiller operated truck companies, five paramedic rescue units, an air and light unit, and one battalion chief all staffed with trained fire fighters. These resources are distributed geographically throughout the City's fire stations. In total, the TFD employs 163 personnel, 144 of which are sworn personnel and 19 are non-sworn personnel (TFD 2019). At any given time, each station is staffed with a minimum of 1 frontline engine, 1 reserve engine, and 4 to 15 sworn response personnel on duty. Fire Station No. 5 closest to the Project site is constantly staffed and equipped with six sworn response personnel on duty each day, one frontline engine, one frontline rescue, and one reserve engine (TFD 2018a).

Mutual Aid Agreements

Redondo Beach considered a feasibility study for merging the RBFD with the Los Angeles County Fire Department as a cost savings measure (Los Angeles County Fire Department 2019), but ultimately voted to end this pursuit in August 2019. Nevertheless, both Redondo Beach and Torrance are engaged in mutual aid agreements with each other as well as with the other fire departments in the region, including Manhattan Beach and El Segundo (Los Angeles County Fire Department). These mutual aid agreements provide regional fire protection including the provision of supplemental fire protection services, equipment, and personnel in special situations. This means that units participating in the mutual aid agreements could be dispatched to Redondo Beach or Torrance. Likewise, units from Redondo Beach or Torrance could be requested to assist in those jurisdictions.

- **DISPATCH TIME:** The elapsed time from when an emergency call is place to when a unit is notified (i.e., dispatched).
- **TURNOUT TIME:** The elapsed time from when a unit is notified (i.e., dispatched) until that unit changes leaves the station and changes their status to responding.
- **TRAVEL TIME:** The elapsed time from when a responding unit leaves the station until its arrival on the scene.
- **TOTAL RESPONSE TIME:** The cumulative elapsed time from when an emergency call is placed until the unit arrives on the scene.

Redondo Beach Response Times

According to the National Fire Protection Association (NFPA) Code 1710 (Standard for the Organization and Deployment of Fire Suppression Operations, EMS, and Special Operations to the Public by Career Fire Departments), dispatch time for fire suppression, medical response, and special operations should be less than or

equal to 60 seconds 90 percent of the time. Turnout time should be 60 seconds for EMS responses and 80 seconds for fire responses. NFPA also requires fire stations to establish an objective of 240 seconds (i.e., 4 minutes) or less of travel time for the first arriving engine company at a fire suppression incident or the first responder with an automatic defibrillator or higher-level capacity at an emergency medical incident. The NFPA standards require that these objectives be met for at least 90 percent of incidents. The most recently released 2020 NFPA standards were also revised to include a requirement for fire stations to establish an objective of a second properly staffed four-person unit to arrive within 360 seconds (i.e., 6 minutes) or less. RDFD and TFD response times are measured against these NFPA standards. In addition, TFD has also developed more aggressive response time goals for both high-risk and low- to moderate-risk fires based on the Insurance Services Officer (ISO) grading schedule, which is described further below, as well as historical response data and TFD personnel and community expectations (TFD 2018b).

In 2019, RBFD responded to a total of 7,488 incidents, a 3-percent increase from the previous year, and a 5-percent increase from 2017 (City of Redondo Beach 2020a). Of these calls 4,805 (approximately 64 percent) were for medical incidents, 2,571 (approximately 34 percent) were for non-fire and marine incidents, and 112 (approximately 1.5 percent) were for active fire incidents. As further discussed below under *Project Site Fire Protection Services Infrastructure, Calls, Responses*, there were 53 emergency incident calls to the campus. In 2019, RFBD had an average dispatch time of 70 seconds, which exceeds the benchmark established in the NFPA standards by 10 seconds. However, in 2019, the RFBD had an average total response time of 4 minutes and 10 seconds for all calls within the City (City of Redondo Beach 2020a). This is well below the benchmark established in the NFPA standards. The average response time for all calls within the City has consistently improved in recent years from 4 minutes and 43 seconds in 2017 and 4 minutes and 16 seconds in 2018 (see Table 3.13-1; City of Redondo Beach 2020a).

**Table 3.13-1. RBFD Response Times and Performance**

| | Goal Time (minutes) | Average Response Time of all Calls (2019; minutes) |
|---|---|---|
| Call Processing | < 1 | 1:10 |
| Turnout Time | < 1:20 (fire); < 1 (EMS) | - |
| Travel Time 1st Unit | < 4 | - |
| Travel Time 2nd Unit | < 6 | - |
| Total Response Time for 1st Unit | < 6:20 (fire); < 6 (EMS) | 4:10 |

Notes: Total response time for the 1st Unit includes call processing, turnout time, and travel time. No data was available/reported for Turnout Time and unit-specific Travel Times in 2019; however, the total response time is well below the benchmark established in the NFPA 1710 standards.
Source: City of Redondo Beach 2020a; Varone 2019.

Torrance Response Times

TFD responds to over 15,000 calls for service annually. In 2017 the TFD received 15,383 calls for service, a 6.94-percent increase (i.e., an increase of 1,070 calls) from the number of calls in 2015 (TFD 2018b). The majority of these calls were for EMS and 981 were for fire incidents (e.g., structure fires, vehicle fires, fire alarms, or other fires).

As previously described, in addition the NFPA standards, the TFD has also developed goal response times for both high-risk and low- to moderate-risk fires based on the ISO grading schedule, which is described further below, as well as historical response data and TFD personnel and community expectations (TFD 2018b). High-risk fires require deployment of both first-due units and Effective Response Force units. (An Effective Response Force is the minimum amount of equipment and staffing that must reach the scene of an emergency to initiate an effective intervention strategy.) First-due units are staffed with a minimum of four firefighters, capable of establishing command, assigning incoming resources, securing a water source, and initiating rescue or fire attack. The goal response time of first-due units is 6 minutes and 24 seconds. Effective Response Forces are staffed with a minimum of 16 operations personnel and fulfill remaining fire suppression duties. The goal response time of a first-due unit for low- to moderate-risk fires is also 6 minutes and 24 seconds. The goal response times of Effective Response Forces in high-risk fire incidents is 10 minutes and 24 seconds. Low- to moderate-risk fires only require arrival of a first-due unit capable of high-risk first unit duties as well as advancing a fire attack sufficient to extinguish the fire (TFD 2018b).

TFD uses the Torrance Public Safety Dispatch Center to dispatch TFD resources. Calls are received by a call taker – typically a sworn police officer – that transfers to the fire dispatcher, the law dispatcher, or both. The dispatch center's overall 90-percent performance for call handling over the 3-year period from 2015-2018 was 1 minute and 54 seconds. This time exceeds the benchmark of 60 seconds or 1 minute for EMS calls established in the NFPA standards by 54 seconds (TFD 2018b).

The TFD 90-percent performance for turnout time on calls for the 4-year period from 2015-2018 was 2 minutes and 10 seconds. This turnout time also does not meet the benchmark of 60 seconds for EMS responses and 80 seconds for fire responses established by the NFPA standards (TFD 2018). Over the period of 2015-2018, for 90 percent of all high-risk fires, the total response time for the arrival of the first-due unit was 7 minutes and 56 seconds (TFD 2018b). This time exceeds the TFD goal time of 6 minutes and 24 seconds by 1 minute and 32 seconds. For 90 percent of all high-risk fires, the total response time for the arrival of the Effective Response Force, staffed with 16 firefighters and officers is 13 minutes and 27 seconds (TFD 2018b). This time exceeds the TFD

goal of 10 minutes and 24 seconds by 3 minutes and 3 seconds. For 90 percent of all low- and moderate-risk fires, the total response time for the arrival of the first-due unit was 8 minutes and 48 seconds (TFD 2018b). This exceeds the TFD goal of 6 minutes and 24 seconds by 2 minutes and 24 seconds (see Table 3.13-2).

**Table 3.13-2. TFD Fire Response Call Performance**

| | Goal Time (minutes) | 90th Percentile Performance Time High Risk (minutes) | 90th Percentile Performance Time Low and Moderate Risk (minutes) |
|---|---|---|---|
| Call Processing | < 1 | 2:08 | 2:12 |
| Turnout Time | < 1:20 (fire); < 1 (EMS) | 2:11 | 2:51 |
| Travel Time 1st Unit | < 4 | 5:01 | 5:19 |
| Travel Time Effective Response Force | | 9:46 | - |
| Total Response Time 1st Unit | 6:24 | 7:56 | 8:48 |
| Total Response Time Effective Response Force (for High-Risk Fires) | 10:24 | 13:27 | - |

Source: TFD 2018b.

Torrance has also developed benchmark performance measures for Advanced Life Support and Basic Life Support EMS incidents. For 90 percent of all Advanced Life Support and Basic Life Support EMS incidents, the total response time goal of the first-due unit is 6 minutes and 4 seconds (TFD 2018b). EMS dispatches can include a first-due unit or an Effective Response Force. First-due units are staffed with a minimum of two paramedics or three emergency medical technicians and are capable of assessing scene safety, establishing command, evaluating the need for additional resources, conducting an initial patient assessment, initiating Basic Life Support, and initiating early defibrillation. Effective Response Forces are capable of conducting a comprehensive patient assessment; obtaining vitals and a detailed medical history of the patient; initiating advanced life support actions in accordance with Los Angeles County EMS protocol; assisting transport personnel with packaging the patient; and caring for the patient until care is transferred to an equal or higher medical authority at the receiving hospital. If an Effective Response Force is Advanced Life Support, it is staffed with a minimum of four operations personnel. If an Effective Response Force is Basic Life Support it is staffed with a minimum of two paramedics or three emergency medical technicians (see Table 3.13-3; TFD 2018b).

**Table 3.13-3. TFD EMS Response Call Performance**

| | Goal Time (minutes) | 90th Percentile Performance Time (minutes) for EMS-ALS | 90th Percentile Performance Time (minutes) for EMS-BLS |
|---|---|---|---|
| Call Processing | < 1 | 1:40 | 1:36 |
| Turnout Time | < 1:20 | 1:55 | 1:55 |
| Travel Time 1st Unit | < 4 | 4:33 | 4:39 |
| Travel Time Effective Response Force | | 4:09 | - |
| Total Response Time 1st Unit | 6:04 | 7:05 | 7:06 |
| Total Response Time Effective Response Force | 6:04 | 8:52 | - |

Source: TFD 2018b.

Over the period 2015-2018, for 90 percent of all Advanced Life Support EMS incidents, the total response time for the arrival of the first-arriving unit was 7 minutes and 5 seconds and 8 minutes and 52 seconds for the arrival of the Effective Response Force (TFD 2018). This exceeds the TFD goal times by 1 minute and 1 second and 2 minutes and 48 seconds, respectively. The total response time for the arrival of the first-due unit was 7 minutes and 6 seconds (TFD 2018). This exceeds the TFD goal times by 1 minute and 2 seconds.

Fire Prevention

The RBFD Fire Prevention Division provides inspection services, plan review, issuance of permits, fire code enforcement, fire cause investigations, internal safety investigations, citizen safety awareness programs, public fire education, public information services, and community relations events (City of Redondo Beach 2020b). The purpose of the Fire Prevention Division is to protect the community by reducing the likelihood of loss of life, property damage, and environmental harm from fire, explosion, unauthorized release of hazardous materials, and natural disasters through engineering, education, and fire/life safety code enforcement. Engine companies and the Fire Prevention Division personnel conduct thorough and periodic inspections of commercial buildings and multi-unit residential structures in order to provide the public with the maximum protection from loss of life and property through fire.

The TFD Community Risk Reduction Division applies life safety codes to new and existing structures, performs fire investigation and oversees hazardous material administration. Staff includes trained individuals who provide fire safety information and assistance to City staff about new projects in the City, review new construction plans for fire protection regulations conformity

and emergency access, and investigate fires that occur within the City to determine their cause and origin.

The Los Angeles County Fire Department acts as the Certified Unified Protection Agency (CUPA) providing hazardous materials response and remediation (refer to Section 3.8, *Hazards and Hazardous Materials*) with RBFD and the City of Torrance authorized as participating agencies. The participating agencies manage hazardous materials programs in their respective cities and CUPA implements six State environmental programs: Hazardous Materials Reporting and Response Planning, Uniform Fire Code Business Plan, Hazardous Waste Generation and On-Site Treatment, Accidental Release Prevention, Aboveground Storage Tank, and Underground Storage Tank.

Insurance Services Office Rating

*Emergency access to the Project site is currently provided by the driveways located along North Prospect Avenue, which provide a connection to the perimeter circulation road.*

The ISO provides rating and statistical information for the insurance industry in the U.S. and rates fire departments nationwide for their effectiveness. In determining its community rating, the ISO evaluates a community's fire protection needs and services and then assigns each community a Public Protection Classification rating. The rating is derived from a cumulative point scoring system, which grades the community's fire-suppression delivery system, including fire dispatch (i.e., operators, alarm dispatch circuits, telephone lines available), fire department (i.e., equipment available, personnel, training, distribution of companies, etc.), and water supply (i.e., adequacy, condition, number and installation of fire hydrants). The ratings range in descending rank from Class 1 (the best level of service) to Class 10 (no service). As of 2019, the RBFD has an ISO Class 2 rating (Los Angeles County Fire Department 2019). As of 2018, the TFD has an ISO rating of 1, with high marks in each criterion including communication (i.e., receiving and handling alarms), water supply, and fire department credibility (City of Torrance 2018; TFD 2018b). The ISO ratings indicate that the RBFD and TFD have sufficient supplies and are well-equipped to respond to emergencies in Redondo Beach and Torrance.

Project Site Fire Protection Services Infrastructure, Calls, Responses

The campus is served by an existing 8-inch fire service line and has five on-site fire hydrants as well as two off-site fire hydrants located on the east side of North Prospect Avenue (refer to Appendix L). Emergency access points are provided at the existing driveways along North Prospect Avenue, which provide a connection to the perimeter circulation road.

The campus is located within Redondo Beach within approximately 1.2 miles of the three RBFD fire stations, and is well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the RBFD. Records indicate that a total of 451 EMS calls associated with the campus at 514 North Prospect Avenue occurred between January 2015 and July 2019, with an average of 98 calls per year and just over 8 calls per month for the 60 double-occupancy Memory Care units with 120 beds total.[1] Each of these EMS calls was responded to by either RBFD Fire Station No. 1 or No. 2 (see Table 3.13-4). The data presented below in Table 3.13-4 indicates total calls to the Beach Cities Health Center at 514 North Prospect Avenue, which includes the Silverado Beach Cities Memory Care Community.

**Table 3.13-4. EMS Calls for the BCHD Campus (2015-2019)**

| Period | EMS Calls Per Year | Average EMS Calls Per Month |
|---|---|---|
| 2019 (January – July) | 53 | 7.6 |
| 2018 (January – December) | 102 | 8.5 |
| 2017 (January – December) | 101 | 8.4 |
| 2016 (January – December) | 92 | 7.7 |
| 2015 (January – December) | 103 | 8.6 |
| **Average** | **98** | **8.2** |

Notes: Calls for the campus between 2015-2019 were limited to EMS responses, no fire responses were recorded during this period.

### 3.13.2 Regulatory Setting – Fire Protection

Federal Regulations

*Uniform Fire Code*

The Uniform Fire Code contains specialized technical fire and life safety regulations that apply to the construction and maintenance of buildings and land uses. Topics addressed in the Uniform Fire Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm

[1] For reference this is similar to the 85 calls per year assumed in the Draft EIR prepared for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 203121065). The assumed number of calls per year assumed in the Kensington Assisted Living Facility Draft EIR was based on an average per bed estimate of 0.65 calls per bed per year to a similar facility within the City.

systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings.

State Regulations

*California Fire Code (Title 24, Part 9, California Code of Regulations)*

The California Fire Code is Title 24, Part 9 of the California Code of Regulations (CCR), and is also referred to as the California Building Standards Code (CBSC). The California Fire Code combines the Uniform Fire Code with amendments necessary to address California's unique needs. The CBSC includes regulations which are consistent with nationally recognized standards of good practice, intended to facilitate protection of life and property. Among other issues, its regulations address the mitigation of fire explosion hazards, management and control of the storage, handling and use of hazardous materials and devices, mitigation of conditions considered hazardous to life or property in the use or occupancy of buildings, and requirements to address safety of emergency response personnel.

*California Health and Safety Code*

State fire regulations set forth in California Health and Safety Code (H&SC) Sections 13000 *et seq.* address building standards, fire protection and notification systems, provision of fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

*California Occupational Safety and Health Administration*

In accordance with the 8 CCR Sections 1270, Fire Prevention, and 6773, Fire Protection and Fire Fighting Equipment, the California Occupational Safety and Health Administration (CalOSHA) has established minimum standards for fire suppression and EMS. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Environmental Hazards / Natural Hazards Element*

Goals, objectives, and policies of the Environmental Hazards / Natural Hazards Element of the general plan related to fire prevention and protection include:

Objective 12.1: Endeavor to implement and monitor all possible and necessary fire prevention, fire protection, and emergency preparedness measures to adequately protect residents, employees, visitors and structures from the risk of and impacts due to fire and fire-related emergencies.

Policy 12.1.1 Continue to provide and strive to upgrade an adequate, modern system of fire protection to residents, employees, and visitors of the City of Redondo Beach.

Policy 12.1.2 Continue to cooperate with fire, paramedic, and emergency operations personnel in adjacent municipalities and the County of Los Angeles to assist each other in carrying out the existing regional fire protection agreement.

Policy 12.1.3 Assess the potential impacts of future increases in development density and related circulation impacts and patterns on local fire prevention and protection efforts and emergency response times; ensuring, through the design review and plan check process, that such new development will not result in a reduction of fire protection services below acceptable levels.

Policy 12.1.4 Continue to support public and private programs assisting in the further reduction of potential urban fires, including weed and brush removal and installation and maintenance of fire retardant plantings.

Policy 12.1.5 Continue to monitor, maintain, and upgrade the condition and operation of the local water system and supply, the distribution and operation of local fire hydrants, fire alarm boxes, and fire hose cabinets on the Municipal Pier.

Objective 12.3: Insure that all high occupancy structures, critical facilities, other vital emergency facilities, and local residential, commercial, and industrial structures are designed and constructed to minimize the level of risk of structural failure in a fire or emergency situation.

Policy 12.3.1 Continue to require that all developments be submitted for governmental review according to the Planning and Land Use Section of the California Government Code.

Policy 12.3.2 Enforce all structural and fire safety regulations of the Uniform Building Code, Uniform Fire Code, State Fire Code and appropriate

provisions of the Redondo Beach Municipal Code relating to sprinkler systems, smoke detector systems, and fire alarm systems.

Policy 12.3.3 Continuously re-evaluate and study the need to upgrade the specific provisions of the Redondo Beach Municipal Code relating to sprinkler systems, smoke detector systems, heat detector systems, and fire alarm systems.

Policy 12.3.4 Continue the existing program and practice of inspecting local residential, commercial, and industrial structures for compliance with state and local fire laws, regulations, ordinances, and practices.

*Redondo Beach Municipal Code*

Redondo Beach Municipal Code (RBMC) Section 3-~~.0~~4.101 adopts the California Fire Code as the Fire Code for the City of Redondo Beach. The RBMC also contains local amendments to the California Fire Code that include additional requirements related to address numbers, fire watch, fire alarm systems, fire protection systems alarms, photovoltaic solar panels, sprinklers, and prohibition of fireworks. The Fire Code is intended to provide for the maximum protection of life and property to the extent feasible, and includes stringent requirements addressing fire prevention and fire suppression for new buildings. Fire Code requirements play an important role in minimizing the risk of fires and preventing property loss, injury, and death within the City.

*Redondo Beach Public Services Funding*

Funding for the RBFD is determined through Redondo Beach's annual budget process. As required by City of Redondo Beach Charter Section 17.9, the annual budget must be adopted by the City Council on or before June 30 of each year. Under the City's current budget, the Fire Department is authorized ~~for 67 personnel, including 62 sworn firefighter and officer positions (City of Redondo Beach Financial Services Department 2019). The proposed Fiscal Year 2020-2021 budget would authorize~~ a total of ~~67~~60 personnel, including ~~62~~56 sworn firefighter and officer positions (City of Redondo Beach ~~2020d~~Financial Services Department 2020). As well as personnel, other operating expenses identified in the annual budget consist of maintenance and operations, internal service fund allocations, and capital outlays.

City of Torrance Local Policies and Regulations

*Torrance General Plan Safety Element*

The City of Torrance is committed to maintaining a safe environment by minimizing fire hazards to existing and new residential developments. The following policies in the Torrance General Plan Safety Element aim to minimize the risks associated with urban fires and wildland fires and are relevant to the proposed Project:

Policy S.2.1 Continue to enforce building fire codes and ordinances.

Policy S.2.2 Continue to enforce the City's fire prevention and suppression requirements for water supply, water flows, fire equipment access, and vegetation clearance in new and modified developments.

Policy S.2.3 Continue to research and adopt best practices pertaining to fire management and fire hazards.

Policy S.2.4 Continue to involve the Fire Department in the development review process to ensure that fire safety is addressed in new and modified developments.

The following policies to provide a high level of fire, police, and emergency medical services are relevant to the proposed Project:

Policy S.6.2 Maintain an adequate number of fire stations, facilities, and services sufficient to meet high fire protection standards.

Policy S.6.4 Provide for a maximum six-minute Fire Department response time.

*Torrance Municipal Code*

The Torrance Municipal Code (TMC) identifies land use categories, development standards, and other general provisions that ensure consistency between the Torrance General Plan and proposed development projects. The following provisions from the TMC focus on fire services impacts associated with new development projects and are relevant to the proposed Project:

Chapter 29.5 (Fire Facilities Impact Fees). This Chapter of the TMC sets forth the fees that are imposed on residential and nonresidential development to ensure that new development pays its fair share of the costs required to support needed fire facilities and related costs necessary to accommodate such development. The funds are to be utilized for payment of the actual or

estimated costs of fire facilities, apparatus, and equipment related to new residential and nonresidential construction.

Chapter 85.1 (Fire Code). The Torrance City Council has adopted and incorporated by reference, as though set forth in full in this Section of the Municipal Code, the California Fire Code, 2016. The California Fire Code sets forth requirements including emergency access, emergency egress routes, interior and exterior design and materials, fire safety features including sprinklers, and hazardous materials.

The City collects development impact fees for fire facilities from all new residential and non-residential development per TMC Section 29.5.1. If the proposed development within the City of Torrance right-of-way is determined to be applicable to the proposed Project, the City of Torrance would calculate and collect the required fees prior to issuance of a grading or building permit.

### 3.13.3 Impact Assessment and Methodology – Fire Protection

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 California Environmental Quality Act (CEQA) Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on fire protection and emergency response services if:

a) The project would result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.

Methodology

This section: 1) evaluates the availability and level of existing fire protection services; 2) analyzes the potential increases in demand for fire protection and EMS as a result of implementation of the proposed Project including the Phase 1 preliminary site development plan and the more general Phase 2 long range development program; and 3) determines the adequacy of existing fire protection services to meet future demand and whether the proposed Project would increase the demand for fire protection services such that there would be a need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts.

This analysis utilizes the anticipated in the population associated with the proposed Project (refer to Section 3.12, *Population and Housing*), to assess increased demand for fire protection services. Increases in residential, employee, and visitor populations at the Project site were considered in comparison with RBFD staffing levels, assets, and response times. Within this context, impacts to fire protection services are considered potentially significant if the proposed Project would increase the demand for fire protection services such that there would be a need for new or physically altered RBFD facilities, the construction of which could cause significant environmental impacts.

### 3.13.4 Project Impacts and Mitigation Measures – Fire Protection

Impact Description (PS-1)

*a) The project would result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.*

**PS-1** **The proposed Project – including the Phase 1 preliminary site development plan under Phase 1 and the more general Phase 2 development program – could incrementally increase the demand for the Redondo Beach Fire Department (RBFD) fire protection and Emergency Medical Services (EMS) services as well as other non-emergency services. However, this increase would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. This impact would be *less than significant.***

The California Fire Code standards described in Section 3.13.2, *Regulatory Setting – Fire Protection*, are intended to provide for the maximum protection of life and property to the extent feasible, and include stringent requirements addressing fire prevention and fire suppression for new buildings. Requirements include but are not limited to the installation of fire alarms, fire sprinklers, and fire communication systems; the use of more fire-resistant building materials; and the provision of adequate emergency access, fire hydrants, visible address signage, and minimum fire flow rates for water mains. Additionally, multiple State and local programs and policies are in place to reduce potential fire safety impacts associated with new development or redevelopment.

The Redondo Beach General Plan Environmental Hazards / Natural Hazards Element and the Torrance General Plan Safety Element include policies to reduce fire hazards and ensure provision of adequate fire services, including, review of development requests, providing local structural inspections, and enforcement of State and local fire regulations (City of Redondo Beach 1993; City of Torrance 2010). As previously described, RBFD has a comprehensive and active fire prevention program, including a dedicated Fire Prevention Division, which provides inspection services, plan review, issuance of permits, Fire Code enforcement, fire cause investigations, internal safety investigations, citizen safety awareness programs, public fire education, public information services, and community relations events (City of Redondo Beach 2020b). Similarly, TFD's Community Risk Division applies life safety codes to new and existing structures, performs fire investigation and oversees hazardous material administration (TFD 2020a).

As part of the development review processes for the proposed Project, the RBFD and TFD would review the final designs of Phase 1 and Phase 2 prior to issuance of Certificates of Occupancy to ensure that all development is designed to meet the required fire protection safety standards in the Fire Code, thus reducing overall demand for fire protection services (City of Redondo Beach 2020c; TFD 2020a). BCHD coordinated with RBFD regarding the requirements for emergency access as a part of the development of the preliminary site development plan for Phase 1 to ensure that the pedestrian promenade would adequately support fire engines and other RBFD assets used during a fire response or EMS response.

Operation of the proposed BCHD Healthy Living Campus would result in an increase in residents, employees, and visitors at the campus, and could result in incremental increases in RBFD responses. Phase 1 of the proposed Project would increase the total number of individuals requiring fire protection services through the overall addition of 177 new Assisted Living bed spaces to the existing 120 Assisted Living bed spaces, bringing the total permanent residents supported at the site to 297. As previously described in Section 3.13.1, *Environmental Setting – Fire Protection*, the RBFD responded to an annual average of 98 EMS calls to the Beach Cities Health Center at 514 North Prospect Avenue in 2015 to 2019, which constitutes 1.3 percent of the 7,488 incidents that the RBFD responded to in 2019 (refer to Table 3.13-4). Implementation of Phase 1 of the proposed Project would relocate the 60 existing double occupancy Memory Care units (120 bed spaces) and develop 157 new Assisted Living units (177 new bed spaces), resulting in a total of 297 bed spaces.

Assuming an average of 0.82 annual calls per bed space per year based on the average number of service calls to the existing Beach Cities Health Center, the campus would generate an estimated total of 244 emergency calls per year following the completion of the proposed development under

Phase 1. This would represent an increase in total calls by a factor of approximately 2.5 when compared to the average of 98 calls per year under existing conditions. (This analysis conservatively assumes that each of the EMS calls for the existing campus was associated with the Silverado Beach Cities Memory Care Community, rather than other medical office building space or the CHF currently located within the Beach Cities Health Center at 514 North Prospect Avenue. It is likely that EMS calls would not increase to this extent because at least some of the calls to the existing campus are likely attributable to other uses in the Beach Cities Health Center, which would no longer operate once Phase 2 construction begins.)

As with each of the EMS calls from 2015-2019, it is assumed that all future EMS calls would be addressed by RBFD Fire Station No. 1 or 2. (Responses by TFD would be an extremely rare occurrence and would not affect their overall response time goals or ratio of sworn personnel to residents.) Currently, the RBFD has a ratio of 0.93 sworn personnel to every 1,000 residents using the estimated 2019 population of 66,749. The addition of 177 Assisted Living residents to the campus would not substantially alter the ratio of firefighters from 0.93 sworn personnel to every 1,000 residents. (This minor increase in population would reduce the ratio by < 0.01, and does not account for the fact that some of the residents would likely be from the existing Redondo Beach population.) Additionally, as discussed in Section 3.12, *Population and Housing*, new employees and visitors to the campus would be drawn from the South Bay region and would not measurably affect the ratio of firefighters to residents. RBFD's average response times regularly meet their total response time goals (refer to Table 3.13-1), and RBFD has the existing required assets to respond to emergencies at the existing Beach Cities Health Center. The proposed Project would redevelop the existing Beach Cities campus, which is in close proximity (<1.2 miles) from RBFD's three fire stations. Because response times to the existing campus are satisfactory and the proposed Project would only incrementally increase the demand for RBFD services, the proposed Project would continue to be located well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the RBFD and would not require new or physically altered RBFD facilities.

As described in Section 2.0, *Project Description*, prior to the issuance of Certificates of Occupancy for the proposed development under Phase 1 and Phase 2, BCHD would coordinate with the RBFD and the Redondo Beach Police Department (RBPD) to prepare an Emergency Response Plan for the campus. This would include an operational handbook that contains processes and procedures for emergencies (e.g., evacuations during a fire, earthquake, etc.). The operational handbook would provide the training requirements and procedures for BCHD staff to contact and coordinate with first responder services. For the reasons stated above, construction and operation of the Project would not affect the ability of RBFD to maintain adequate fire protection and EMS services, and

would not require the provision of new or physically altered facilities that could have a substantial adverse physical impact; therefore, the Project impacts would be *less than significant*.

Cumulative Impacts

As described in Impact PS-1, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – could create an incremental increase in demand for EMS and fire protection services from RBFD. (Responses by TFD or other fire departments in the Beach Cities or South Bay region would be an extremely rare occurrence and would not affect their overall response time goals or ratio of sworn personnel to residents.) Therefore, the proposed Project, in combination with past, present, and reasonably foreseeable probable future projects in Redondo Beach (refer to Table 3.0-1 in Section 3.0, *Cumulative Impacts*) could contribute to an incremental increase in demand for fire protection services.

The majority of cumulative projects within the City are either public works projects and capital improvement projects or small-scale residential projects (e.g., one- to five-unit condominium developments) that would also have a minor effect on the ratio of sworn personnel to residents. Assuming an average household size of 2.21 people (U.S. Census 2019), these cumulative residential projects would result in an increase in population of approximately 175 people, which is well within the Southern California Association of Governments (SCAG) projections for growth in housing units and population (SCAG 2020) (refer to Section 3.12, *Population and Housing*). With adherence to the Fire Code, which limits the associated impact on fire protection services, the RBFD would continue to be able to provide fire protection services comparable to current services and response times (i.e., RBFD would continue to meet the total response time goal of the 6 minutes for fire response time and 6 minutes and 20 seconds for EMS response). Fire protection services in Redondo Beach are maintained and expanded through property taxes and collection of fees that grow incrementally as development occurs within a service area. Providing for new equipment, facilities, and staffing is assessed as part of Redondo Beach's annual fiscal budget process. (~~Similarly, the~~The City of Torrance collects development impact fees for police facilities from all new residential and non-residential development per TMC Section 29.5.1.) Based on acknowledgment of, and planning for, future growth within Redondo Beach, and the associated fire protection needs, significant cumulative impacts associated with the need for and/or construction of new or physically altered fire protection facilities are not expected to occur within the foreseeable future. Therefore, neither the preliminary site development plan under Phase 1 nor long range development program under Phase 2 would result in substantial contributions to cumulatively considerable impacts due to the new or physically altered fire protection facilities within Redondo Beach.

### 3.13.5 Environmental Setting – Police Protection

Redondo Beach Police Department Assets

*The RBPD Main Station provides police protection services to the City of Redondo Beach.*

Police protection services for Redondo Beach are provided by the Redondo Beach Police Department (RBPD), which is divided into a Support Services Bureau and Operations Bureau. The Support Services Bureau provides administrative, management, and recruitment services while the Operations Bureau consists of investigation, patrol and special operations divisions. Each patrol unit is headed by a patrol lieutenant and two sergeants. Units included in the Special Operations Division include traffic, pier, community services, and municipal services. Currently, the RBPD consists of 153 staff, 105 of which are staffed under the Operations Bureau. The RBPD Main Station is located at 401 Diamond Street, approximately 0.75 miles southwest of the Project site. The RBPD also operates a part-time police substation located on the Redondo Beach Pier, approximately 1.2 miles southwest of the Project site. The substation allows for officers assigned to the Pier/Harbor Unit to store their equipment, document reports, and houses an office for the Sergeant of the Unit.

Torrance Police Department Assets

Police protection and law enforcement services for the City of Torrance is provided by the Torrance Police Department (TPD). The TPD has one station located at 3300 Civic Center Drive, approximately 2.25 miles northwest of the Project site

Currently, the TPD staffs 227 sworn officers and 128 civilian staff. The TPD is led by the Police Chief and supported by a Command Staff, consisting of a Deputy Chief and three Captains. Each Captain is responsible for one of the major components within the Department's structure: Administrative, Patrol, Special Operations, and Services Bureaus. These bureaus are further divided into divisions that include detective, traffic, patrol, special investigation, community affairs, services, communications, records, personnel and research and training (TPD 2018). The TPD also features many specialized details including a seven-person Crime Scene Investigation unit, a Gang Detail, and a Canine Detail. The Special Operations Bureau offers a Crime Impact

Team that, working undercover, targets major offenders, and a Narcotics Team that targets major international drug distribution organizations.

Crime Rates

In 2018, the RBPD made 2,184 arrests and issued 4,220 traffic citations (City of Redondo Beach Financial Services Department 2019). In 2019, there were a total of 160 violent crimes (240 crimes per 100,000 people) and 1,370 property crimes (2,052 crimes per 100,000 people) in Redondo Beach (Federal Bureau of Investigation 2019a).[2] The reported number of violent crimes was 46 percent lower than the State-wide rate (441 per 100,000 people) and 35 percent lower than the national rate (367 per 100,000 people) (Federal Bureau of Investigation 2019c),(Federal Bureau of Investigation 2019b). Property crime rates were 12 percent lower than the State average (2,331 per 100,000) and 3 percent lower than the national average (2,110 per 100,000 people) (Federal Bureau of Investigation 2019c; 2019b).

In 2019, the City of Torrance reported a total of 280 violent crimes (195 crimes per 100,000 people) and 2,853 property crimes (1,987 crimes per 100,000 people) (Federal Bureau of Investigation 2019a). The reported number of violent crimes was 56 percent lower than the State-wide rate (441 per 100,000 people) and 47 percent lower than the national rate (367 per 100,000 people) (Federal Bureau of Investigation 2019b, 2019c). Property crime rates were 15 percent lower than the State average (2,331 per 100,000) and 6 percent lower than the national average (2,110 per 100,000 people) (Federal Bureau of Investigation 2019b, 2019c).

Calls and Response Times

The RBPD responds to an average of 186 calls per day (Kochhiem 2020). Calls received by the dispatch center are given a priority ranking of 1 to 3, with 1 being the highest priority. Average response times is 3 minutes 53 seconds for priority 1 calls, 10 minute and 55 seconds for priority 2 calls, and 22 minutes and 3 seconds for priority 3 calls (Kochhiem 2020).

In 2019, TPD officers received a total of 243,172 calls, an average of approximately 666 calls per day (City of Torrance Public Records Center 2020). In 2019, police response time for priority calls was 7 minutes and 20 seconds (City of Torrance Public Records Center 2020).

[2] Crimes rates per 100,000 people are based on 2019 U.S. Census population estimates. Refer to Section 3.12, *Population and Housing*.

### 3.13.6 Regulatory Setting – Law Enforcement

City of Redondo Beach Local Policies and Regulations

*Redondo Beach Municipal Code*

RBMC Section 9-15.01 formally adopts the Uniform Building Security Code, 1997 Edition, published by the International Conference of Building Officials for the protection of the public health and safety. This code establishes minimum standards to make dwelling units resistant to unlawful entry. It regulates swinging doors, sliding doors, windows and hardware in connection with dwelling units of apartment houses or one- and two-family dwellings. The code considers the concerns of police, fire and building officials in establishing requirements for resistance to burglary which are compatible with fire and life safety.

*Redondo Beach Public Services Funding*

Funding for the RBPD is determined through Redondo Beach's annual budget process. As required by City of Redondo Beach Charter Section 17.9, the annual budget must be adopted by the City Council on or before June 30 of each year. Under the City's current budget, RBPD is authorized for ~~154 personnel, including 96 sworn positions (City of Redondo Beach Financial Services Department 2019). The proposed Fiscal Year 2020-2021 budget would authorize~~ a total of ~~153~~ 145 personnel, including ~~95~~92 sworn positions ~~(City of Redondo Beach 2020a)~~ (City of Redondo Beach Financial Services Department 2020). Besides personnel, other operating expenses identified in the annual budget consist of maintenance and operations, internal service fund allocations, and capital outlays.

City of Torrance Local Policies and Regulations

*Torrance Municipal Code*

The City collects development impact fees for police facilities from all new residential and non-residential development per TMC Section 29.6.1. If the proposed development within the City of Torrance right-of-way is determined to be applicable to the proposed Project, the City of Torrance would calculate and collect the required fees prior to issuance of a grading or building permit.

### 3.13.7 Impact Assessment and Methodology – Law Enforcement

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on police protection and law enforcement services if:

a) The project would result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection and law enforcement services.

Methodology

This section: 1) evaluates the availability and level of existing law enforcement services; 2) analyzes the potential increases in demand for police services as a result of redevelopment of the campus under the Phase 1 preliminary site development plan and under the more general Phase 2 development program; and 3) determines the adequacy of existing and planned police facilities to meet future demand and whether the proposed Project would increase the demand for law enforcement services such that there would be a need for new or physically altered police facilities, the construction of which could cause significant environmental impacts.

This analysis utilizes the anticipated increases associated with the proposed Project as identified in Section 3.12, *Population and Housing*, to assess increased demand for law enforcement services. Increases in residential, employee, and visitor populations at the Project site were considered in comparison with RBPD staffing levels, assets, and response times. Within this context, impacts to law enforcement services are considered potentially significant if the proposed Project would increase the demand for law enforcement services such that such that there would be a need for new or physically altered RBPD facilities, the construction of which could cause significant environmental impacts.

### 3.13.8 Project Impacts and Mitigation Measures – Law Enforcement

Impact Description (PS-2)

*a) The project would result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental*

*impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection and law enforcement services.*

**PS-2** **The implementation of the proposed Project – including the preliminary development plan under Phase 1 and the development program under Phase 2 – would incrementally increase the demand for law enforcement services. However, the required compliance with existing building security standards (e.g., Redondo Beach Municipal Code [RBMC] Section 9-15.01) would ensure that implementation of the Project would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered police protection and Emergency Medical Services (EMS) services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. This impact would be *less than significant.***

The addition of 177 new bed spaces under the Phase 1 preliminary site development plan as well as the expansion of community services and recreational facilities under the Phase 2 development program would increase the number of residents, employees, and visitors present on the campus at any given time, especially during daytime and weekend operational hours. The increase in activity level at the Project site could generate the need for law enforcement services. However, the development under Phase 1 and Phase 2 of proposed Project would include the incorporation of security features such as access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas, and minimum dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and ~~updated~~ adequate security lighting on site~~, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities,~~ pursuant to the requirements of RBMC Section 10-~~5~~2.1706(c)(10). These measures would help reduce impacts on police services by deterring criminal activity at the Project site.

As described in Impact PS-1 with regard to firefighters, the addition of 177 Assisted Living residents to the campus would not substantially alter the existing ratio of police officers to residents. Additionally, as discussed in Section 3.12, *Population and Housing*, new employees and visitors to the campus would be drawn from the South Bay region and would not measurably affect the ratio of police officers to residents.

Staffing and equipment needs of the RBPD are reviewed each year during the preparation of the overall budget. Renovation plans for the existing police station are currently under review, but there are no plans to expand the existing station or construct a new station (Kochheim 2020).

Further, the RBPD has not identified the need to expand or construct a new police station, and new facilities are not currently required. Based on the current facilities, staffing, and equipment, implementation of the preliminary site development plan under Phase 1 and the development program under Phase 2 would not exceed the overall capacity of existing RBPD services. The proposed Project would not require new or physically altered facilities to maintain service ratios or response times. Therefore, the impacts for Phase 1 and Phase 2 of the proposed Project would be *less than significant*.

Cumulative Impacts

As described in Impact PS-2, the proposed Project – including the preliminary site development plan under Phase 1 and the development program under Phase 2 – could recreate an incremental increase in demand for law enforcement services provided by RBPD related to theft, trespassing, or vandalism. Therefore, the proposed Project, in combination with past, present, and reasonably foreseeable probable future projects in Redondo Beach (refer to Table 3.0-1 in Section 3.0, *Cumulative Impacts*) could contribute to an incremental increase in demand for law enforcement services.

The majority of cumulative projects within Redondo Beach are either public works projects and capital improvement projects or small-scale residential projects (e.g., one- to five-unit condominium developments) that would also have a minor effect on the ratio of RBPD police officers to residents. With adherence to existing building security standards, which deter crime, the RBPD would continue to be able to provide law enforcement services comparable to current services and response times. Additionally, as previously described in Impact PS-2, law enforcement services in Redondo Beach are maintained and expanded through property taxes and collection of fees that grow incrementally as development occurs within a service area. Providing for new equipment, facilities, and staffing is assessed as part of Redondo Beach's annual fiscal budget process. (~~Similarly, the~~The City of Torrance collects development impact fees for police facilities from all new residential and non-residential development per TMC Section 29.6.1.) Based on acknowledgment of, and planning for, future growth within Redondo Beach, significant cumulative impacts associated with the need for and/or construction of new or physically altered law enforcement services or facilities are not expected to occur within the foreseeable future. Therefore, neither the Phase 1 preliminary site development plan nor the Phase 2 development program would result in substantial contributions to cumulatively considerable impacts due to new or physically altered on law enforcement facilities within Redondo Beach.

## 3.14 TRANSPORTATION

This section of the Environmental Impact Report (EIR) analyzes the potential environmental effects of the proposed Project on transportation as defined by the California Environmental Quality Act (CEQA) guidelines. This analysis was prepared based on the Beach Cities Health District (BCHD) Healthy Living Campus Transportation Impact Analysis (Transportation Study) prepared by Fehr & Peers (Fehr & Peers 2021a; see Appendix K). Consistent with the intent of Senate Bill (SB) 743 and the associated updates to the CEQA Guidelines, the Transportation Study provides a discussion of vehicle miles traveled (VMT) associated with the proposed Project. Pedestrian, transit, and bicycle impacts anticipated to result from operation of the proposed Project were also analyzed in the Transportation Study.

- **VEHICLE MILES TRAVELED:** With the adoption of SB 743, the State of California changed the method of traffic analysis required through the CEQA for publicly- and privately-initiated projects. The previous practice of evaluating transportation impacts used on-road congestion or level of service (LOS). SB 743 requires the amount of driving and length of trips – as measured by *"vehicle miles traveled"* or VMT – be used to assess transportation impacts on the environment for CEQA review. These impacts will be reduced or *"mitigated"* by options such as increasing transit, providing for active transportation such as walking and biking, and participating in mitigation banks. All jurisdictions have the option to tailor requirements to their unique communities.

As discussed in detail within Section 3.14.2, *Regulatory Setting*, changes in State law now require an analysis of VMT by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing level of service (LOS) by measuring intersection congestion and roadway capacity. This reflects State policy goals to reduce vehicle energy use, particularly that associated with non-renewable fossil fuels, and associated greenhouse gas (GHG) emissions and their adverse effects on global climate change. VMT is determined by multiplying the number of trips generated by the proposed Project by the average length of the trips (measured in miles). VMT per capita is calculated as the total annual miles of vehicle travel divided by the total population in the planning area (e.g., Project site, city, county, region, etc.). Many factors affect travel behavior, including density, design and diversity of land uses, design of the transportation network, access to regional and local destinations, availability of high-quality transit and active transportation facilities, demographics, and effectiveness and availability of Transportation Demand Management (TDM) plans. Typically, low density suburban style development – with greater separation between different types of land uses (e.g., between residential and commercial uses) and without access to high quality transit, bicycle paths or pedestrian facilities – generate more vehicle miles traveled compared to development located in urban areas characterized by mixed-use development and more travel options.

As discussed in Section 3.14.3, *Impact Assessment and Methodology*, as part of the Transportation Study, Fehr & Peers conducted driveway and pedestrian counts to support the VMT analysis.

At the request of the City of Redondo Beach and the City of Torrance, and separate from the Transportation Study, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in level of service [LOS]) at intersections along avenues, boulevards, and commercial streets in the cities of Redondo Beach and Torrance (Fehr & Peers 2021b; see Appendix J). While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

### 3.14.1 Environmental Setting

Regional Highway and Street Network

Regional access to the Project site is provided via Pacific Coast Highway (State Route [SR-] 1), San Diego Freeway (Interstate [I-] 405), Artesia Boulevard (SR-91), and Hawthorne Boulevard (SR-107). Pacific Coast Highway, located approximately 0.5 miles west of the Project site, is a major State highway running along the majority of the coastline in California. Within Redondo Beach and Torrance, the Pacific Coast Highway has four lanes and is a designated major arterial. The I-405 freeway, located approximately 2.5 miles northeast of the Project site, is a major highway that extends throughout Orange and Los Angeles County and runs in a northwest-southeast orientation through Redondo Beach and Torrance. It is a grade-separated freeway with eight lanes for mixed flow traffic and two lanes designated for High Occupancy Vehicles (HOV). Artesia Boulevard is a four-lane east-west major arterial located approximately 1 mile north of the Project site. Hawthorne Boulevard, located approximately 1.5

*Artesia Boulevard provides regional access to Redondo Beach and Torrance and connects other regional highways, such as I-10, I-405, SR-107, and Pacific Coast Highway (SR-1).*

miles east of the Project site, provides eight through lanes that run in a north-south direction within Redondo Beach, and is designated as a major arterial.

City Street Classifications

The Redondo Beach General Plan Circulation Element categorizes the street system according to its functions for mobility (i.e., ease of movement) and access (i.e., ability to arrive at a particular destination) (City of Redondo Beach 2009). These street categories include Freeways, Arterial Streets, Collector Streets, and Local Streets.

- **Freeways** – With a controlled number of entry points and grade-separated from City streets, freeways are intended to provide high speed regional movement. Limited access is provided to abutting properties.
- **Arterial Streets** – Designed to carry up to 50,000 vehicles per day, arterial streets are primarily intended to provide movement. Access to abutting property can be provided, but is minimized. Arterials are frequently further divided into major and secondary arterials.
- **Collector Streets** – Typically carrying up to 15,000 vehicles per day, collector streets allow moderate volumes of through traffic to move between local streets and arterials while also providing access to abutting properties.
- **Local Streets** – Local streets are generally intended to carry less than 2,000 vehicles per day with the highest priority to the function of providing access to abutting properties. Given this intended function, through traffic is discouraged.

The Torrance General Plan Circulation and Infrastructure Element further divides arterial streets into Principal Arterials, Major Arterials, and Minor Arterials (City of Torrance 2010).

Local Street Network in the Project Vicinity

The street network in Redondo Beach is primarily gridded with good connectivity. Arterial streets in the vicinity of the Project site generally provide two to three vehicle travel lanes in each direction, with left-turn pockets at most intersections and right-turn pockets at some intersections. Posted travel speeds in the vicinity of the Project site range from 35 to 50 miles per hour (mph), with the majority of streets allowing travel up to 35 mph.

The Redondo Beach General Plan Circulation Element designates the following major arterials as local truck routes:

- Sepulveda/Pacific Coast Highway;
- Aviation Boulevard;
- Inglewood Avenue (north of Artesia Boulevard);
- Hawthorne Boulevard;
- Marine Avenue;
- Manhattan Beach Boulevard;
- Artesia Boulevard;
- Redondo Beach Boulevard;
- Anita/190th Street; and
- Torrance Boulevard (east of Pacific Coast Highway).

Torrance has designated its one principal arterial (Hawthorne Boulevard) and most major arterials in the City as truck routes. Major arterials designated as local truck routes within Torrance include, but are not limited to, 190th Street, Anza Avenue, Artesia Boulevard, Del Amo Boulevard, Sepulveda Boulevard, and Torrance Boulevard.

*Hawthorne Boulevard, which supports primarily commercial uses with some industrial and residential, is a designated truck route within Torrance. Planning within the Hawthorne Boulevard Corridor is guided by the Hawthorne Boulevard Corridor Specific Plan.*

As previously described, regional access to the Project site is provided by the Pacific Coast Highway and a network of arterial and collector streets. The arterial street network that serves the area within the vicinity of the Project site includes 190th Street, Anita Street, Anza Avenue, Beryl Street, Del Amo Boulevard, Hawthorne Boulevard, Inglewood Avenue, North Prospect Avenue, and Torrance Boulevard. Local streets include Blossom Lane, Diamond Street, Harkness Lane, Entradero Avenue, Flagler Lane, Towers Street, and Redbeam Avenue.

*Arterial Streets*

- **190th Street** is an east-west major arterial that runs east from Flagler Lane following the transition from Anita Street. The roadway provides two lanes in each direction. There are left-turn pockets at most intersections. On-street parking is generally allowed on the north side of the street, except between Rindge Lane and Phelan Avenue. On the south side of the street, on-street parking is generally prohibited west of Entradero Avenue. West of Flagler Lane, 190th Street transitions to become Anita Street. In the Redondo Beach General Plan Circulation Element and Torrance Circulation and Infrastructure Element, 190th Street is designated as a local truck route.
- **Anita Street** is an east-west major arterial that runs east of the Pacific Coast Highway with two lanes in each direction. Between North Maria Avenue and North Prospect Avenue, Anita Street has a center left-turn lane. East of North Prospect Avenue, there are left-turn pockets at most intersections, with a raised median. On-street parking is generally permitted on both sides of Anita Street. Anita Street becomes 190th Street at the intersection with Flagler Lane. Anita Street is designated as a local truck route by Redondo Beach.
- **Anza Avenue** is a north-south secondary arterial that runs from 190th Street south to the Pacific Coast Highway. Within the vicinity of the Project site, Anza Avenue provides two lanes in each direction. Left-turn pockets are provided at most intersections along the avenue. On-street parking is prohibited. However, between Arvada Street and the junction with Halison Street, a service road is provided on the east side of the street, separated by a raised median, and on-street parking is allowed on the service road. Similar to 190th Street, Anza Avenue is designated as a local truck route by both the City of Redondo Beach and City of Torrance.
- **Beryl Street is** a northeast-southwest secondary arterial that runs from Harbor Drive to 190th Street. North of 190th Street, Beryl Street becomes Blossom Lane. Between Catalina Avenue and North Prospect Avenue, Beryl Street provides one lane in each direction with a center left-turn lane. Beryl Street narrows to two lanes east of Flagler Lane. On-street parking is permitted between Catalina Avenue and Flagler Lane and on the south/east side of the street west of Flagler Lane.
- **Del Amo Boulevard** is an east-west major arterial that runs from Diamond Street on the western end to Cerritos in the east. From Diamond Street to North Prospect Avenue, one travel lane is provided in each direction. East of North Prospect Avenue, two travel lanes in each direction are provided with an intermittent raised center median. Between Diamond Street and North Prospect Avenue, on-street parking is permitted on the north side of the street only. East of North Prospect Avenue, on-street parking is permitted for a brief stretch

on south side of the street from Donora Avenue to the bicycle lane transition west of the intersection with Anza Avenue, and is otherwise prohibited.

- **Hawthorne Boulevard (SR-107)** is north-south major arterial that provides four travel lanes in each direction. A raised center median separates opposing traffic. Left-turn lanes are provided at most intersections. On-street parking is prohibited within the vicinity of the Project site. Hawthorne Boulevard is identified as a designated local truck route by both the City of Redondo Beach and the City of Torrance.
- **Inglewood Avenue** is a north-south major arterial that provides two travel lanes in each direction north of 190th Street. South of 190th Street, the roadway transitions to a local road providing one travel lane in each direction. On-street parking is permitted north and south of 190th Street. Inglewood Avenue north of Artesia Boulevard is designated as a local truck route by the City of Redondo Beach.
- **Prospect Avenue** is a north-south secondary arterial that runs from Artesia Boulevard to the Pacific Coast Highway. North of Emerald Street, it is considered North Prospect Avenue and south of Emerald Street, it is considered South Prospect Avenue. Within the vicinity of the Project site, North Prospect Avenue provides two travel lanes in each direction. Left-turn lanes are provided at most intersections.
- **Torrance Boulevard** is an east-west major arterial that provides two travel lanes in each direction west of Anza Avenue and three travel lanes in each direction east of Anza Avenue. A raised median is present from South Prospect Avenue to Wendy Drive. Left-turn lanes are provided at most intersections. On-street parking is permitted on both sides of the street between Henrietta Street and Anza Avenue. Torrance Boulevard is a local designated truck route identified in the Torrance General Plan Circulation and Infrastructure Element.

*Local Streets*

- **Blossom Lane** is a local street that runs north-south from 190th Street to Manhattan Beach Boulevard. South of 190th Street, Blossom Lane transitions to become Beryl Street. The roadway provides one travel lane in each direction. On-street parking is generally allowed on both sides of the street.
- **Diamond Street** is a northeast-southwest collector street that runs from Catalina Avenue to North Prospect Avenue and provides one travel lane in each direction with a shared left-turn lane. South of North Prospect Avenue, Diamond Street turns into a three-lane roadway with one lane in each direction and a center left-turn lane. On-street parallel parking, Class

II (i.e., striped) bicycle lanes, and 8-foot-wide sidewalks are provided along both sides of the roadway.

- **Entradero Avenue** is a north-south collector street that runs from 190th Street to Del Amo Boulevard and provides one travel lane in each direction. On-street parking is generally allowed on both sides of the street.
- **Flagler Lane** is a north-south collector street that runs from Towers Street to Artesia Boulevard and provides one travel lane in each direction. Between Towers Street and Beryl Street, Flagler Lane is considered a local street. The portion of Flagler Lane along the western border of Dominguez Park between Anita Street and Beryl Street provides a center left-turn lane and on-street parking. On-street parking along this segment of Flagler Lane includes diagonal parking on the east side of the street facing Dominguez Park and parallel parking along the west side of the street. On-street parking north of 190th Street consists of parallel parking on both sides of the street.

*Flagler Lane widens to approximately 62 feet between 190th Street and Beryl Street to support parallel parking along the southbound side of the street and diagonal parking along its boundary with Dominguez Park, as well as two travel lanes and a center left turn lane (left). South of Beryl Street, Flagler Lane narrows to a 36-foot wide, two-lane street until its southern terminus at Towers Street (right).*

- **Harkness Lane** is a north-south local street that runs from Rockefeller Lane to Beryl Street and provides one travel lane in each direction. Given its narrow width, on-street parking is prohibited along a majority of Harkness Lane, except on the east side of the street between Morgan Lane and Amour Lane and on both sides of the street between Anita Street and Beryl Street.
- **Towers Street** is an east-west local street that runs from Flagler Lane to Redbeam Avenue and provides one travel lane in each direction. On-street parking is generally allowed on both sides of the street.

- **Redbeam Avenue** is a north-south local street that runs from Towers Street to Del Amo Boulevard and provides one travel lane in each direction. On-street parking is generally allowed on both sides of the street.

Local Access to the Project Site

As described in Section 2.0, *Project Description*, the Project site is generally bordered by North Prospect Avenue to the southwest, Diamond Street to the southeast, Flagler Lane and Flagler Alley to the east, and Beryl Street to the north. Local access to the BCHD campus is provided by North Prospect Avenue from the west and southwest. Access to the vacant Flagler Lot is available from Beryl Street to the north.

*Within the vicinity of the Project site (i.e., from approximately 200 feet south of Beryl Street to Diamond Street), a smaller parallel frontage road accessible from the southbound lanes of North Prospect Avenue and Diamond Street splits off from the primary travel lanes along North Prospect Avenue to provide access to single-family houses southwest of the Project site. This smaller parallel frontage road is separated from North Prospect Avenue by a raised median and large hedge that partially obscures views of the campus.*

- **North Prospect Avenue** runs in a northwest-southeast direction along the Project site's frontage, with left-turn channelization for traffic turning east into the Project site. There are no bicycle lanes along North Prospect Avenue or street parking along the Project site frontage however, on-site parking is allowed on portions of the road farther from the Project site.
- **Beryl Street** runs in an east-west direction near the Project site along the adjacent Redondo Village Shopping Center and the vacant Flagler Lot providing two eastbound lanes, one westbound lane, and a center turn lane for vehicles entering and exiting the Redondo Village Shopping Center. Beryl Street intersects with Flagler Lane to the east at a four-way stop, with Hawkes Lane to the north at a four-way stop with access into Redondo Village Shopping Center, and with North Prospect Avenue to the west at a signalized intersection. East of Flagler Lane, Beryl Street narrows to two vehicle lanes. Parallel street parking and 8-foot-wide sidewalks are provided along both sides of Beryl street.
- **Flagler Lane** runs in a north-south direction near the Project site with two vehicle lanes along the majority of the roadway. Adjacent to the Project site, Flagler Lane narrows to 40 feet wide and provides parallel parking and sidewalks along the eastern side of the street

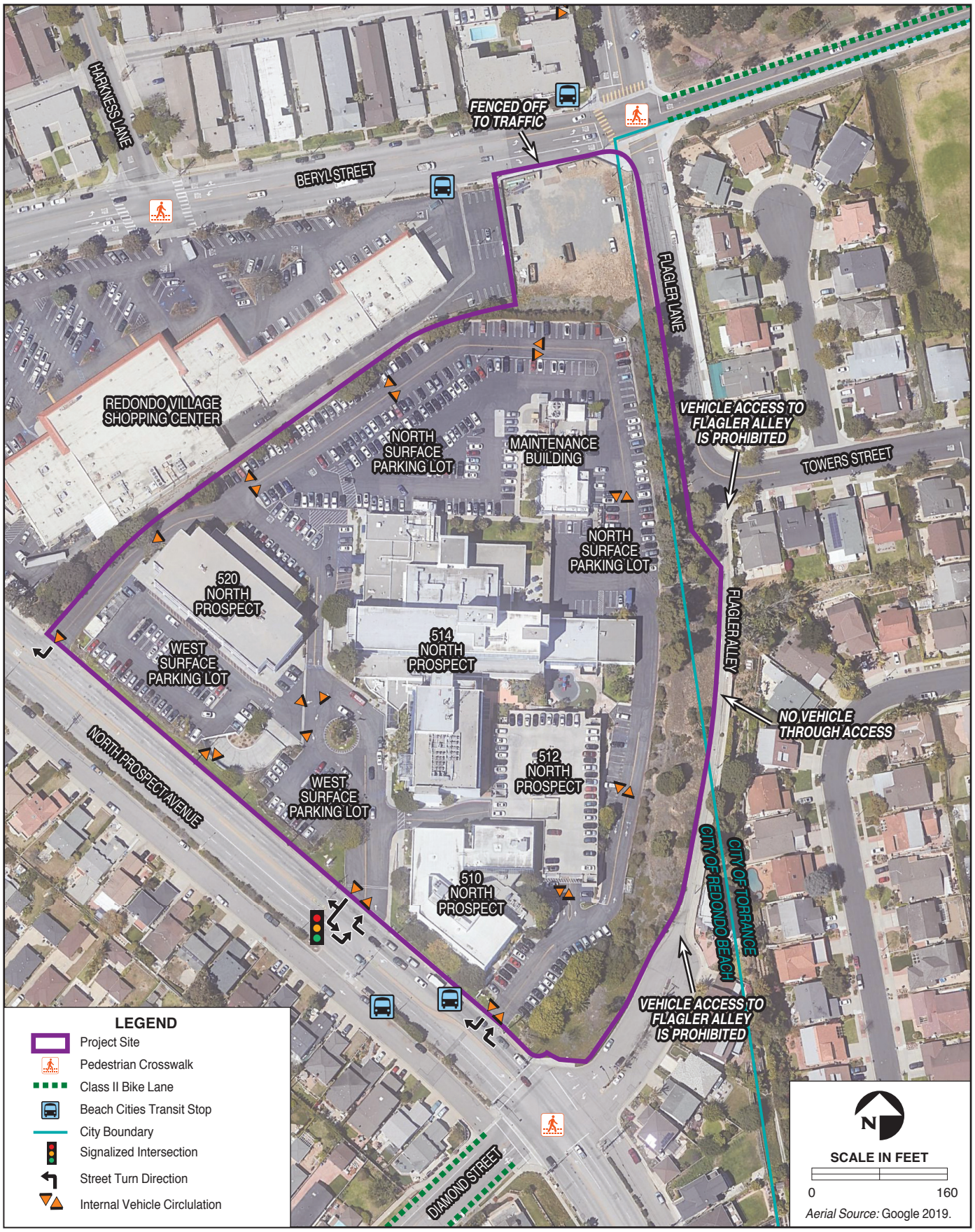
only. Flagler Lane terminates approximately 450 feet south of its intersection with Beryl Street at Flagler Alley. At its southern terminus, the roadway turns east into Towers Street, which provide access to the single-family residential neighborhood to the east, located within Torrance.

- **Flagler Alley** is an approximately 500-foot-long north-south alley that provides a paved pedestrian and bicycle connection between Flagler Lane to the north and Diamond Street to the south (refer to Figure 3.14-1). Flagler Alley is blocked off to vehicles by an existing wooden fence from the north side at the southern terminus of Flagler Lane and a chain-link fence from the south side at the northern terminus of Diamond Street. The 10-foot-wide alley also provides an 8-foot-wide sidewalk.
- **Diamond Street** borders the southeast corner of the campus, west of North Prospect Avenue. Within the vicinity of the Project site, Diamond Street provides access to six single-family residences immediately southeast of the Project site. Access into this segment of Diamond Street is provided via one lane from the signalized intersection with North Prospect Avenue. Egress from this section of Diamond Street is available via one left-turn lane, one through lane, and one right-turn lane.

*Project Site Access*

The following three existing driveways provide access to the campus (refer to Figure 3.14-1):

- The main entrance to the campus is located at a signalized driveway intersection with North Prospect Avenue, approximately 275 feet to the northwest of the intersection of North Prospect Avenue & Diamond Street. This primary entrance provides full left- and right-turn access;
- A secondary driveway is located approximately 100 feet northwest of the intersection of North Prospect Avenue & Diamond Street. This secondary entrance is unsignalized and provides right-turn-only entry/exit to the perimeter circulation road and the southern portion of the campus; and
- Another secondary driveway is located approximately 450 feet northwest of the main entrance along North Prospect Avenue. This secondary entrance is unsignalized and provides right-turn-only entry/exit to the perimeter circulation road and the northern portion of the campus.

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**Existing Circulation and Access**

**FIGURE 3.14-1**

The main entrance to the campus routes vehicles through a roundabout leading to the existing short-term surface parking lot and drop-off area as well as the entrance to the existing subterranean parking garage. The secondary driveways provide access to a 30-foot-wide perimeter circulation road that runs along the northwest, north, and east borders of the campus and provides access to surface parking spaces at the northern and southern corners of the campus (refer to Figure 3.14-1). Additionally, the vacant Flagler Lot is accessible via a driveway along Beryl Street as well as a locked gate at the corner of the campus's northern parking lot.

Public Transit Services in the Project Vicinity

Local and regional public transit in the Project area is provided by the Los Angeles County Metropolitan Transportation Authority (Metro), Beach Cities Transit, and Torrance Transit. In general, transit service frequency is relatively low in the immediate vicinity of the Project site, presenting challenges to the transit dependent and limiting attractiveness to the non-transit dependent.

*Several bus stops along the Beach Cities Transit Line 102 are located in the immediate vicinity of the Project site, including one across from the vacant Flagler Lot on westbound Beryl Street and one adjacent to the west of Flagler Lot on eastbound Beryl Street.*

- **Metro** – Metro Line 344 provides service between the Harbor Gateway Transit Center in the Gardena and Rancho Palos Verdes to the south. In the Project area, Metro Line 344 travels north-south along Hawthorne Boulevard. Service is provided 7 days per week, with weekday peak period headways of approximately 20 to 30 minutes.
- **Beach Cities Transit** – Beach Cities Transit Line 102 provides local service between the Metro Green Line, the South Bay Galleria, and the Redondo Beach Pier. Within the vicinity of the Project site, Line 102 travels north and south along North Prospect Avenue and northeast and southwest along Beryl Street. Service is provided 7 days per week, with weekday peak period headways of approximately 30 to 45 minutes.
- **Torrance Transit** – Torrance Transit Line 2 provides local service between the Del Amo Fashion Center and the Harbor Freeway (I-110). Within the vicinity of the Project site,

Line 2 travels east-west along Torrance Boulevard and north-south along Inglewood Avenue. Service is provided 7 days per week, with weekday peak period headways of approximately 60 minutes. Line 3 provides rapid service between Downtown Long Beach and the Redondo Beach Pier. In the Project area, Line 3 travels east-west along Torrance Boulevard. Service is provided 7 days per week, with weekday peak period headways of approximately 10 to 15 minutes. Line R3 provides local service between Downtown Long Beach and the South Bay Galleria. Within the vicinity of the Project site, Line R3 travels north-south along Hawthorne Boulevard. Service is provided on weekdays only. Westbound headways in the AM peak period are approximately 6 to 15 minutes, and 25 minutes in the PM peak period. Eastbound headways are approximately 45 to 55 minutes in the AM peak period and 20 to 25 minutes in the PM peak period. Line 8 provides local service between Torrance and the Los Angeles International Airport (LAX) Transit Center. Within the vicinity of the Project site, Line 8 travels north-south along Hawthorne Boulevard. Service is provided 7 days per week, with weekday peak period headways of approximately 20 to 30 minutes (see Table 3.14-1 and Figure 3.14-1).

**Table 3.14-1. Existing Public Transit Services in the Project Area**

| Route | Line | Description | Hours of Operation | | Approximate Headway[1] (minutes) | | | |
|---|---|---|---|---|---|---|---|---|
| | | | Weekday | Weekend | Weekday AM | Weekday PM | Saturday | Sunday |
| Metro Line | 344 | Harbor Gateway Transit Center – Rancho Palos Verdes | 5:09 a.m. – 9:30 p.m. | 5:50 a.m. – 9:26 p.m. | 20 - 40 | 30-90 | 30 | 60 |
| Beach Cities Transit | 102 | Metro Green Line, South Bay Galleria, and Redondo Beach Pier | 6:05 p.m. – 8:01 p.m. | 8:00 a.m. – 7:48 p.m. | 30 | 30 | 30 | 20 - 40 |
| Torrance Transit | 2 | Del Amo Fashion Center – I-110 | 5:54 a.m. – 10:55 p.m. | 6:34 a.m. – 9:21 p.m. | 60 | 60 | 60 | 60 |
| | 3 | Downtown Long Beach – Redondo Beach Pier | 4:35 a.m. – 11:33 p.m. | 5:30 a.m. – 10:08 p.m. | 20 - 30 | 20 - 30 | 20 - 30 | 20 - 30 |
| | R3 | Downtown Long Beach – South Bay Galleria | 6:20 p.m. – 7:01 p.m. | - | 6 - 55 | 20 - 25 | - | - |
| | 8 | Torrance – LAX Transit Center | 4:43 a.m. – 11:17 p.m. | 5:33 a.m. – 10:19 p.m. | 20 - 30 | 20 - 30 | 60 | 60 |

Notes: [1] Headways are generally defined as the time period between vehicles in a transit system.
Source: Fehr and Peers 2021a.

wood.

**Existing and Planned Public Transit Services and Bicycle Facilities**

**FIGURE 3.14-2**

The Project site is currently directly served by one transit line: Beach Cities Transit Line 102. The northbound Line 102 provides three bus stops adjacent to the Project site: one stop at the campus's southern secondary vehicle entrance (approximately 100 feet north of the intersection of North Prospect Avenue & Diamond Street), and two stops along the southern side of Beryl Street, at the Shell gas station and just west of the vacant Flagler Lot. The southbound Line 102 provides two bus stops adjacent to the Project site: one bus stop along the western side of North Prospect Avenue, directly across the street from the campus's main entrance, and one stop along the northern side of Beryl Street, directly across the street from the vacant Flagler Lot. The Project site is not served by any Metro or Torrance Transit lines. The nearest Torrance Transit line, Line 2, runs along Anza Avenue approximately 0.80 miles east of the campus.

*Shared Mobility Services*

In addition to public transit described above, the WAVE is a senior and disabled curb-to-curb Dial-A-Ride service operating through a cooperative partnership between the City of Redondo Beach and the City of Hermosa Beach. The WAVE provides convenient, inexpensive shared-ride transportation to destinations within Hermosa Beach and Redondo Beach and designated satellite facilities in adjacent communities of Manhattan Beach and Torrance. The service is available to individuals whose disability prevents them from independently boarding an accessible fixed route bus and/or prevents them from getting to or from a boarding location. The service operates on weekdays between 6:00 a.m. and 8:30 p.m. and on weekends between 8:00 a.m. to 8:30 p.m. The WAVE operates from 8:00 a.m. to 5:00 p.m. on holidays including Thanksgiving Day, Christmas Day, and New Year's Day.

*Seniors age 62 and older and individuals of any age with impairment or disability are eligible for using the WAVE within the cities of Redondo Beach and Hermosa Beach.*

Additionally, the growth of privately operated Transportation Network Companies (TNCs) like Lyft and Uber has also changed the way people move in and around Redondo Beach and Torrance. TNC's provide app-based platforms to connect passengers with drivers who use personal, non-commercial vehicles. Lyft and Uber have become the most recognized and ubiquitous forms of shared mobility and provide both local and to some extent regional linkages. Dockless mobility

devices that offer app-based electric scooters and bicycles, such as Bird and Jump, are prohibited in Redondo Beach.

Pedestrian and Bicycle Facilities in the Project Vicinity

*Pedestrian Facilities*

Sidewalks are generally present on both sides of the street throughout the vicinity of the Project site, generally ranging in width from 4 feet wide along the south side of Diamond Street to 9 feet wide along the east side of Flagler Lane. Additionally, sidewalks occur along the eastern side of Flagler Lane and Diamond Street, with Flagler Alley providing an informal pedestrian connection between the two roadways.

Crosswalks are provided along all four legs of the intersection of Beryl Street and North Prospect Avenue and along three legs of the intersection of Beryl Street and Flagler Lane. Additionally, there is a crosswalk provided in the middle of this roadway segment at the driveway entrance to the Redondo Village Shopping Center. Crosswalks are also provided along two legs of the intersection of North Prospect Avenue and Diamond Street and across North Prospect Avenue leading to the main entrance to the campus.

*The campus is accessible via sidewalks and crosswalks along North Prospect Avenue, Beryl Street, Flagler Lane, Diamond Street (left). Flagler Alley (right) provides an informal bicycle path and pedestrian sidewalk to connect Flagler Lane and Diamond Street.*

*Bicycle Facilities*

Bicycle facilities are classified based on the California Department of Transportation (Caltrans) Highway Design Manual (~~2006~~2020) terminology:

- **Class I Bikeway (Bicycle Path)** – A completely separate right-of-way for the exclusive use of bicycles and pedestrians, with vehicle and pedestrian crossflows minimized.
- **Class II Bikeway (Bicycle Lane)** – A restricted right-of-way designated for the use of bicycles, with a striped lane on a street or a highway. Vehicle parking along with vehicle and pedestrian crossflows are permitted.
- **Class III Bikeway (Bicycle Route)** – A right-of-way designated by signs or pavement markings for shared use with pedestrians and motor vehicles.
- **Class IV Bikeway (Separated Bikeway)** – A right-of-way for the exclusive use of bicycles which provides a required separation between the bikeway and through vehicular traffic.

The South Bay Bicycle Master Plan, adopted by the Redondo Beach and Torrance City Councils in 2011, identifies major gaps in the regional bicycle network, primarily within Redondo Beach and between the Torrance and the Pacific Ocean. The bicycle paths along Catalina Avenue and Diamond Street in Redondo Beach provide connections between residential and commercial uses and to Czuleger Park, but do not provide through connections between cities or to major popular destinations. Additionally, three major east-west bicycle routes within the City of Torrance (i.e., Torrance Boulevard, Sepulveda Boulevard, and SR-1) terminate roughly at the border of Torrance with no connection to the Pacific Ocean. The South Bay Bicycle Master Plan indicates that additional Class I, II, and III facilities are planned throughout the Project vicinity. However, under existing conditions, bicycle facilities in the immediate project vicinity are limited and lack connectivity to the larger regional system, requiring cyclists to ride on sometimes busy surface streets.

*Flagler Alley, which is currently used as an informal bike path, is planned for improvements under the BCHD Bike Path Project. The BCHD Bike Path Project would upgrade Flagler Alley as a formal Class I bicycle path that would connect existing Class II bicycle lanes along Diamond Street and Beryl Street, adjacent to the Project site.*

Within 0.5-mile radius of the Project site, Class II bicycle lanes are available on Anza Avenue between 190th Street and Del Amo Boulevard, Beryl Street between Flagler Lane and 190th Street, and Diamond Street between Prospect Avenue and North Catalina Avenue. The Project site has limited connectivity with the existing network of bicycle paths, with no bicycles paths currently bordering the Project site or connecting the Project site with existing regional bicycle paths in the vicinity. (Flagler Alley provides an informal pathway used by bicyclists and blocked to vehicle traffic.) The nearest Class II bicycle lanes are located along Beryl Street between Flagler Lane and 190th Street and along Diamond Street, southwest of its intersection with North Prospect Avenue. These segmented bicycle lanes provide some bicycle connectivity to the site with surrounding neighborhoods, including the Redondo Beach waterfront area and the coastal Marvin Braude Bike Trail via the Diamond Street bicycle lane. Additionally, the Class II bicycle lane along Diamond Street provides connectivity to the existing Catalina Street Class II bicycle path located roughly 0.75 miles to the south, and which provides some north-south access through Redondo Beach.

The South Bay Bicycle Master Plan indicates that additional bicycle facilities are planned throughout the study area, including Class II bicycle lanes on Beryl Street east of Flagler Lane and on West 190th Street east of Beryl Street, as well as Class III bicycle facilities on 190th Street west of Beryl Street. Additionally, separately from the proposed Project, BCHD is currently working with the City of Redondo Beach and the City of Torrance to plan a new protected (i.e., Class I) bicycle facility (BCHD Bike Path Project) along the eastern perimeter of the campus along Flagler Lane and Flagler Alley between the northern terminus of Flagler Alley and Beryl Street.

Circulation Hazards

*Collision History*

A traffic collision is considered to be any event where a vehicle strikes any object while moving. That object could be another car, a pedestrian, or something fixed in place like a light post. When collisions cause damage or injury, the details are recorded by the local law enforcement agency and loaded into the California Highway Patrol Statewide Integrated Traffic Records System (SWITRS). The Transportation Injury Mapping System (TIMS) uses SWITRS data to show an area's High Injury Network (HIN). A HIN consists of streets with a high concentration of traffic collisions that result in severe injuries and deaths, with an emphasis on those involving people walking and bicycling. No roadways in the vicinity of the Project site have been identified by the City of Redondo Beach or the City of Torrance as part of the HIN.

A collision analysis using data collected from the SWITRS was conducted for intersections surrounding the proposed Project which are primary intersections used for access. Based on the

most recently available 5-year collision data (between 2013 and 2018), 323 collisions occurred within the vicinity of the Project on streets used to access the Project site, including people driving, walking, and biking. Of the total number of collisions, 12 resulted in serious injury and five resulted in fatalities.

**Table 3.14-2. Number of Collisions in Project Vicinity (2013-2018)**

| Collision Type | Total | Fatal/Significant Injury Collisions | Total Number of Fatalities |
|---|---|---|---|
| Vehicle-Vehicle | 279 | 13 | 3 |
| Vehicle-Pedestrian | 21 | 4 | 2 |
| Vehicle-Bicyclist | 26 | 0 | 0 |
| **Total** | **323** | **17** | **5** |

Source: See Appendix K.

Hawthorne Boulevard had the highest number of vehicle collisions at its intersections; 33 collisions (10.2 percent) occurred at Hawthorne Boulevard & Del Amo Boulevard, followed by 31 collisions (9.5 percent) at Hawthorne Boulevard & West 190th Street. At both intersections, there was one collision that resulted in a fatality. There were 47 collisions over the 5-year period that involved people either walking or biking along the street segments and key intersections used to access the Project site. Amongst these, four collisions (8.5 percent) resulted in serious injury or death to pedestrians. The intersection of West 190th Street & Hawthorne Boulevard had the highest concentration of collisions, with five reported pedestrian collisions.

Immediately adjacent to the Project site, along Beryl Street and North Prospect Avenue, there was a smaller concentration of collisions, as compared to other segments such as Hawthorne Boulevard, West 190th Street, and Del Amo Boulevard. In total, there were 17 collisions (5.3 percent), which were on the Beryl Street and North Prospect Avenue segments and/or within 200 feet of a key intersection on roadways used to access the Project site. Only two collisions occurred outside of an intersection area. Of these collisions, three collisions resulted in serious injury and one resulted in a fatality. The fatality occurred at North Prospect Avenue & Diamond Street, and involved a motorcyclist. Five collisions occurred at North Prospect Avenue & Diamond Street (closest to the southernmost Project driveway), which was the highest number of collisions closest to the Project site. There were no discernable patterns with regard to collision types (e.g., broadside, rear end, or head-on collisions). Additionally, there are no discernable existing hazards in the vicinity of the Project site due to roadway and driveway configuration.

Closest to the Project site, there were five collisions that involved people walking or biking. These collisions occurred at Beryl Street & Harkness Lane and North Prospect Avenue & Diamond Street

intersections. Of these collisions, two involved children under the age of 18: one walking on Beryl Street and one biking near North Prospect Avenue. There were no collisions reported at the other intersections immediately adjacent to the Project site, including the Project driveways or the Beryl Street & Flagler Street intersection.

*Cut-Through Traffic*

As arterial roads become increasingly congested, drivers often seek out ways for avoiding traffic jams. This is usually done by cutting through residential neighborhoods to avoid heavy traffic on arterial roads. This phenomenon is referred to as *"cut-through traffic."*

*Many bicyclists along North Prospect Avenue ride along the street's wide sidewalks, because the on-road conditions are not suitable for bicycle safety. In particular, several collisions have occurred at North Prospect Avenue & Diamond Street.*

The residents within the Torrance neighborhood to the east of the Project site have expressed concerns regarding cut-through traffic between Beryl Street and Del Amo Boulevard (see Appendix A). Cut-through traffic in these neighborhoods is associated with commuting as well as student pick-up and drop-off at Towers Elementary School. To reduce cut-through traffic and associated safety risks between Beryl Street and Del Amo Boulevard, the City of Torrance is currently planning to pilot a temporary one-way partial closure of southbound traffic on Flagler Lane between Towers Street and Beryl Street. In preparation for the pilot, the City of Torrance conducted license plate surveys during the AM and PM peak periods at four locations on the boundary of the neighborhood, including:

- Beryl Street & Flagler Lane;
- Redbeam Avenue & Del Amo Boulevard;
- Wayne avenue & Del Amo Boulevard; and
- Entradero avenue & Del Amo Boulevard.

The results of the license plate surveys showed that cut-through traffic within the Torrance neighborhood to the east of the campus is highest between Beryl Street & Flagler Lane and Redbeam Avenue & Del Amo Boulevard. During the AM peak period, approximately 47 percent of the vehicles traveling northbound and 41 percent of the vehicle traveling southbound through the neighborhood contributed to cut-through traffic. During the PM peak period, approximately 31

percent of vehicles traveling northbound and southbound through the neighborhood were commuters cutting through the neighborhood (see Table 3.14-3).

**Table 3.14-3. Peak Period Cut-Through Traffic Between Beryl Street and Del Amo Boulevard**

| Direction | Percent of Vehicles Contributing to Cut-Through Traffic | |
|---|---|---|
| | AM Peak Period | PM Peak Period |
| Northbound | 47 | 31 |
| Southbound | 41 | 31 |

Source: Fehr & Peers 2021a.

Vehicle Miles Traveled

*State-wide Vehicle Miles Traveled and Mode Split*

State-wide VMT is highly variable and is affected by the density of development and the mix of land uses within an area. Caltrans reports a total of 344.3 billion State-wide annual VMT and 943.3 million daily VMT in 2017 (the most recent data available for the regional and local VMT data) (Caltrans 2019; see Table 3.15-1). According to the U.S. Census Bureau, the 2017 population for the State of California was 39.36 million (U.S. Census Bureau 2017). Therefore, the 2017 State-wide annual VMT per capita was approximately 8,747 miles (approximately 23.97 daily VMT per capita).

**Table 3.14-4. State-wide Annual and Daily VMT in 2017**

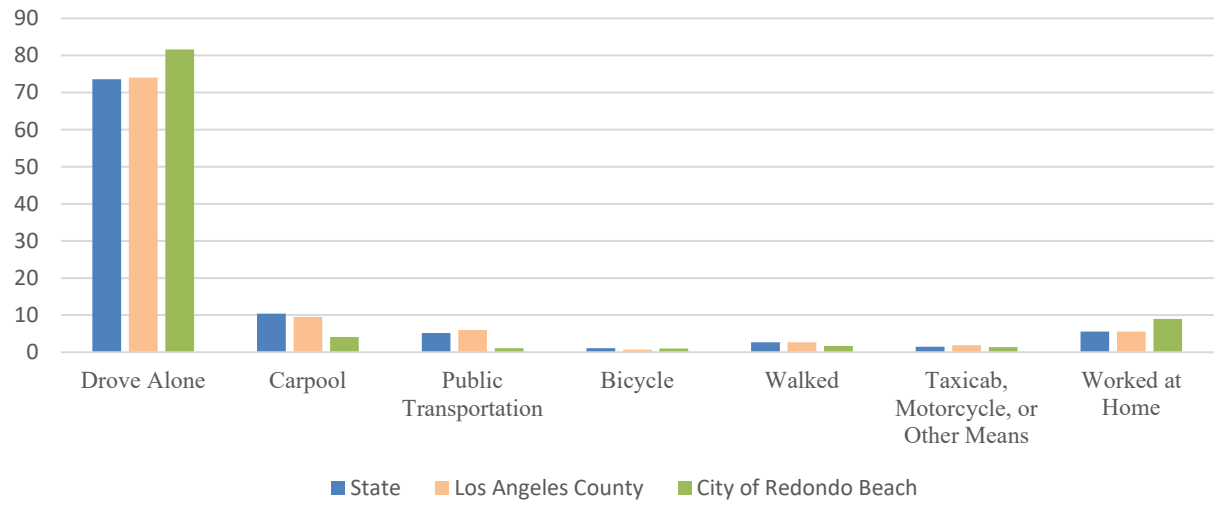
| Public Roads | Annual VMT (in billions) | Daily VMT (in millions) |
|---|---|---|
| State Highways | 187.1 | 512.6 |
| Local Roads[1] | 155.8 | 426.85 |
| Other Agencies[2] | 1.4 | 3.8 |
| **Total of All Public Roads[3]** | **344.3** | **943.3** |

Notes: Totals may not equal sum of components due to independent rounding.
[1] Includes city streets and county roads only
[2] Includes Federal, other State and other local jurisdictions
[3] All public roads include those owned by cities, counties, and various State and Federal agencies
Source: Caltrans 2019.

A majority (approximately 73.6 percent) of the employed population in California drove to work alone in 2017. A smaller portion of the population carpooled (10.4 percent) and took public transit (5.2 percent) to work. Approximately 2.7 percent of the State population walked to work, 1.1 percent biked, and 1.5 percent took a taxi, rode a motorcycle, or chose other means of transportation. Approximately 5.6 percent of the State population worked at home. The average vehicle occupancy (often referred to as *"AVO"*) of workers who drove (alone or carpool) was 1.07

persons per vehicle (see Chart 3.14-1; U. S. Census Bureau 2017). Although data are unavailable, the COVID-19 pandemic has affected VMT in 2020 and 2021 as a result of restrictions on gatherings, stay at home orders, increased telecommuting and declines in use of public transit; however, its long-term effects on travel behavior are unclear.

**Chart 3.14-1. Means of Transportation to Work for the State of California, Los Angeles County, and Redondo Beach**




Note: Charted data does not reflect potent effects of COVID-19 pandemic and its effects on commuting.
Source: U.S. Census Bureau 2017.

*Regional Vehicle Miles Traveled and Mode Split*

According to the Southern California Association of Governments (SCAG) Transportation Safety Regional Existing Conditions report, the SCAG region includes a population of 19 million and a total of 8,700 annual average of VMT per capita in 2017 (SCAG 2017). The SCAG's regional VMT equates to a daily VMT per capita of approximately 23.8 within the greater Los Angeles region.

The 2017 population for Los Angeles County was 10,163,507. The County-wide annual VMT per capita in 2017 was 8,000 annual VMT per capita (approximately 21.9 daily VMT per capita) (SCAG 2017; County of Los Angeles 2019).

Within the County, 74 percent of the employed population drove to work alone in 2017. Less people carpooled to work (9.5 percent) and more people took public transportation (6 percent) than the State averages described above. Similar to the State of California, 2.7 percent of the County's population walked to work, 0.7 percent biked, and 1.9 percent of the population got to work by

taxi, motorcycle, or other means. The remaining 5.6 percent of the County's population worked at home. The average vehicle occupancy of workers who drove (alone or carpool) was 1.07 persons per vehicle, identical to the State average vehicle occupancy (refer to Chart 3.15-1; U. S. Census Bureau 2017).

According to the 2016 SCAG Regional Travel Demand Model (the most recently available model, as the 2020 SCAG Regional Travel Demand Model has not yet been released), the average home-based work VMT per employee (i.e., only vehicle roundtrips between the residence of the trip-maker and their place of work) is 18.4. The average home-based VMT per capita (i.e., all vehicle roundtrips originating from the residence of the trip-maker) for the South Bay Cities Council of Governments (SBCCOG) region is 13.3 (SCAG 2016).

*Redondo Beach Vehicle Miles Traveled and Mode Split*

Within Redondo Beach, the 2016 annual VMT per capita is 11,753 (32.2 daily VMT per capita). The annual VMT per employee is 5,840 (16.0 daily VMT per employee). City-wide average VMT in Redondo Beach is substantially higher than State-wide or County-wide averages. Within Redondo Beach, a larger portion of the population drove alone to work (81.6 percent) than the State and County averages in 2017. Less of the population carpooled (4.1 percent), walked (1.7 percent), and took public transportation (1.1 percent). Similar to the State and County averages, 1.4 percent of the population traveled to work via taxi, motorcycle, or other means and 1.0 percent of the population biked to work. A larger portion of the Redondo Beach population worked at home (9.0 percent) than the State and County averages. The average vehicle occupancy for workers who drove (alone or carpooled) to work in Redondo Beach was 1.03 persons per vehicle, which is similar to State-wide and County-wide averages (refer to Chart 3.14-1; U. S. Census Bureau 2017).

### 3.14.2 Regulatory Setting

Federal Laws and Regulations

*Americans with Disabilities Act of 1990*

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the U.S. Code (USC), beginning at Section 12101. Title III prohibits discrimination on the basis of disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility.

Examples of key guidelines include detectable warning for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

State Laws and Regulations

*Assembly Bill 32, Global Warming Solutions Act*

Transportation is the largest single sector of the economy that generates GHGs, and changes in transportation are a focus of several State-wide regulations to reduce VMT and increase access to non-vehicular modes of travel. Assembly Bill (AB) 32 commits the State of California to reduce State-wide GHG emissions to 1990 levels by 2020. AB 32 acknowledges that such emissions cause significant adverse impacts to human health and the environment, and therefore must be identified and mitigated where appropriate. Achieving these goals requires a reduction of approximately 30 percent from projected State emission levels and 15 percent from 2006 State levels, with even more substantial reductions required in the future. Pursuant to AB 32, the California Air Resources Board (CARB) must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

*Executive Order B-30-15 and Senate Bill 32*

Executive Order B-30-15 established a new State-wide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. This Executive Order acts as an intermediate goal to achieving 80 percent reductions by 2050 as outlined in Executive Order S-3-05. Additionally, this Executive Order aligns California's GHG reduction targets with those of leading international governments, including the 28 nations comprising the European Union. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal established by Executive Order S-3-05 of reducing emissions 80 percent under 1990 levels by 2050.

*Senate Bill 375, Sustainable Communities and Climate Protection Act*

The adoption of SB 375 created a process whereby local governments and other stakeholders must work together within their region to achieve the GHG reductions specified in AB 32 through integrated development patterns, improved transportation planning, and other transportation measures and policies. Under SB 375, the CARB is required to set regional transportation-related GHG reduction targets for 2020 and 2035. Additionally, SB 375 required that those targets be incorporated within a SCS, a required element within the Metropolitan Planning Organization's (MPO's) Regional Transportation Plan (RTP).

On September 23, 2010, CARB adopted transportation-related GHG emissions reduction targets that require a 7 percent to 8 percent reduction by 2020 and between 13 percent and 16 percent reduction by 2035 compared to emissions in 2005 for each MPO. SCAG is the MPO for the Southern California region and is required to work with local jurisdictions, including the City of Redondo Beach and the City of Torrance. CARB has determined SCAG's reduction target for per capita transportation-related GHG emissions to be 13 percent by 2035.

*SB 743*

SB 743 furthers the State's commitment to the goals of AB 32 and SB 375 and adds Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Public Resources Code, Division 13, Section 21099. Key provisions of SB 743, include eliminating the measurement of vehicle delay, or LOS, as a metric that can be used for measuring traffic impacts. Under SB 743, the focus of transportation analysis shifts from LOS to VMT and the reduction of GHG emissions through the creation of multimodal transportation networks and promotion of a mix of land uses to reduce VMT. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines (Title 14 of the California Code of Regulations [CCR]) to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit (i.e., transit priority areas [TPAs]), those alternative criteria must *"promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses"* (Public Resources Code Section 21099[b][1]). Measurements of transportation impacts may include *"vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."* OPR also has discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

As a result, Section 15064.3 was added to CEQA Guidelines, which states *"generally, vehicle miles traveled is the most appropriate measure of transportation impacts."* Section 15064.3 requires that lead agencies no longer use automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, as a criterion for determining a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, CEQA Guidelines Section 15064.3(a), states *"a project's effect on automobile delay does not constitute a significant environmental impact."*

Pursuant to the mandate in SB 743, in January 2016, OPR published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Proposed Transportation Impact Guidelines) recommending that transportation

impacts for projects be measured using a VMT metric. The final Proposed Transportation Impact Guidelines were published in December 2018 (OPR 2018). VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle. These proposed transportation impact guidelines provide substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of GHG, air quality, and energy impacts than automobile delay. With the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, no longer constitutes a significant environmental effect under CEQA (Public Resources Code Section 21099). These updated criteria for transportation impact assessment better align transportation analysis with State GHG reduction goals set by SB 375 to encourage infill development and improve public health through increased active transportation.

*2017 Climate Change Scoping Plan*

CARB is responsible for the coordination and administration of both Federal and State air pollution control programs within California. CARB's 2017 Scoping Plan reflects the new State-wide GHG emissions reduction goals called for in SB 32 of 40 percent below 1990 emissions levels by 2030.

In the transportation sector, GHG emissions reducing measures include low carbon fuels, cleaner vehicles, and strategies to promote sustainable communities and improved transportation choices that result in curbing the growth in VMT (CARB 2017). As it relates to transportation, the Scoping Plan includes measures to reduce VMT and vehicle GHG emissions, including, but not limited to:

- Pursue 15 percent reduction in VMT for light duty vehicles from Business as Usual by 2050.
- Promote all feasible policies to reduce VMT, including land use and community design that reduce VMT such as transit-oriented development.
- Implement complete street design policies that prioritize transit, biking, and walking.
- Increase low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.
- Develop pricing mechanisms such as road user/VMT-based pricing, congestion pricing, and parking pricing strategies.
- Reduce GHG emissions through commute trip reduction strategies, and programs to maximize the use of alternatives to single-occupant vehicles, including bicycling, walking, transit use, and shared mobility options.
- Accelerate equitable and affordable transit-oriented and infill development through new and enhanced financing and policy incentives and mechanisms.

- Increase the number, safety, connectivity, and attractiveness of bicycling and walking facilities to increase use.

*California Manual on Uniform Traffic Control Devices*

The California Manual on Uniform Traffic Control Devices (MUTCD) is published by Caltrans and is issued to adopt uniform standards and specifications for all official traffic control devices in California, in accordance with Section 21400 of the California Vehicle Code (CVC). The California MUTCD incorporates the Federal Highway Administration's Manual on Uniform Traffic Control Devices (2009 Edition) and all policies on traffic control devices issued by Caltrans that were issued at the time of its release. Caltrans publishes Standard Specifications, Standard Special Provisions, Standard Plans, and other manuals, which contain specifications and requirements for traffic control devices, including their use and placement. In some cases, those specifications and requirements can vary from and be more stringent than those shown in the California MUTCD. The proposed Project – including each of the new access points on Beryl Street and Flagler Lane – would be required to be designed in accordance with all California MUTCD design requirements on any roadway facilities affected by the proposed Project.

Regional Plans and Regulations

*SCAG's Regional Transportation Plan/Sustainable Communities Strategy*

As described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, SCAG's Regional Council unanimously approved and fully adopted the 2020-2045 RTP/SCS (Connect SoCal) (SCAG 2020). The 2020-2045 RTP/SCS includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections. The intent of the plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal plan achieves per capita GHG emissions reductions relative to 2005 of 19 percent in 2035 (SCAG 2020).

In October 2020, CARB determined that Connect SoCal is consistent with CARB's GHG reduction targets. Successfully meeting these targets will require substantial effort to reduce VMT. The strategies in Connect SoCal focus on reducing the number of drive-alone trips and overall VMT through ridesharing, which includes carpooling, vanpooling and supportive policies for ridesharing services such as Uber and Lyft; redistributing or eliminating vehicle trips from peak demand periods through incentives for telecommuting and alternative work schedules; and

reducing the number of drive-alone trips through increased use of transit, rail, bicycling, walking and other alternative modes of travel.

Of the 10 goals presented in Connect SoCal, the following six are applicable to transportation:

- Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.
- Goal 4: Increase person and goods movement and travel choices within the transportation system.
- Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.
- Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
- Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.

*2020 Long Range Transportation Plan and Congestion Management Program*

The 2020 Long Range Transportation Plan (LRTP) provides a detailed roadmap for how Los Angeles Metropolitan Transit Authority (Metro) will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP will guide future funding plans and policies needed to move Los Angeles County forward for a more mobile, resilient, accessible, and sustainable future (Metro 2020).

The current LRTP addresses regional public transit and highways and does not propose any transit improvements in proximity to the Project site. On June 28, 2018, the Metro Board of Directors approved initiating the process for the County and all its local jurisdictions to opt out of the California Congestion Management Program, as authorized under the California Government Code Sections 65082 *et seq.* (Metro 2018). The County is now exempt from the Congestion Management Program. On March 12, 2019, the Redondo Beach City Council also voted to opt out of the Congestion Management Program.

*South Bay Bicycle Master Plan*

The South Bay Bicycle Master Plan is intended to guide the development and maintenance of a comprehensive bicycle network and set of programs and policies throughout El Segundo, Gardena, Hermosa Beach, Lawndale, Manhattan Beach, Redondo Beach, and Torrance for 20 years following its adoption. Implementation of this plan is meant to promote and increase bicycle

ridership for all levels of ability across the South Bay. The Plan's primary objective is to increase the number of bicyclists, as well as create a larger base of utilitarian bicyclists, including bicycle commuters, through safe, accessible and consistent bicycle infrastructure, and supporting policies and programs (Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition 2011).

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Circulation Element*

The Redondo Beach General Plan Circulation Element includes goals to reduce trip generation, promote bicycle and pedestrian modes, and link existing and proposed bicycle facilities, creating opportunities for physical activity. The Circulation Element includes a number of goals related to active transportation and alternative modes, including the promotion of alternative modes, the pursuit of bicycle and pedestrian priorities, the enhancement of bicycle infrastructure, and the creation of opportunities for physical activity.

Goal G~~1~~2: Reduce Year 2030 trip generation by 25 percent compared to 2007 levels.

Goal G4: Residents and visitors should be able to safely and conveniently walk, bike, or take transit in Redondo Beach, as they prefer.

Goal G5: Expand transportation demand management (TDM) programs that decrease the number of single-occupant vehicles on the road.

Goal G6: Redondo Beach favors development that purposefully integrates itself with surrounding transportation facilities.

Policy P1 Support transit-oriented development that reduces current automobile trips.

Policy P4 Encourage mixed-use development that incentivizes residents to support nearby land uses by minimizing travel distance.

Goal G11: Maintain the existing supply of public parking.

Policy P12 Require new developments to provide sufficient parking to meet demand.

Policy P13 Encourage shared parking between land uses when consistent with industry standards.

Goal G12: Encourage all employers to pursue successful TDM measures already demonstrated in South California.

Policy P16 Encourage flex hours in work environments.

Policy P17 Provide incentives for employer-based vanpools.

Policy P20 Investigate the use of shared transportation vehicles.

Policy P21 Work with adjacent cities to coordinate incentives for carpools, vanpools, and other measures for Redondo Beach ~~incentives~~ residents.

Goal G13. Link existing and proposed [bicycle and pedestrian] facilities.

Policy P22 Connect North Redondo Beach and South Redondo Beach with bike facilities.

Goal G14: Increase the provision of bike lockers, bike racks, and lighting for bike facilities.

Goal G15: Ensure that ~~residences~~residents will be able to walk or bicycle to destinations such as the beach, the Civic Center, Redondo Beach Pier, Riviera Village, and other activity centers.

Policy P29 Provide climate-appropriate landscaping, adequate lighting, and street amenities to make walking safe, interesting, and enjoyable.

Policy P30 Promote use of alternative transportation for short trips and conduct periodic bicycle and pedestrian counts to assess whether alternative mode use is increasing.

Goal G16: Provide reliable, safe fixed-route transit.

Policy P37 Provide shuttle service to activity areas.

Circulation Element Policy 10 also contains thresholds of significance for signalized intersections. Unrelated to CEQA, plan, policy, and regulatory consistency with these thresholds of significance would be determined as part of the review and approval process with the City of Redondo Beach decision-makers during consideration of discretionary approvals for the Phase 1 site development plan and the Phase 2 development program. The Operational Intersection Analysis may be used to help inform that decision (see Appendix J).

*Redondo Beach Climate Action Plan*

The City of Redondo Beach, in concert with SBCCOG, prepared the Redondo Beach Climate Action Plan. The Climate Action Plan, which was adopted in 2017, contains goals and policies that incorporate energy use reduction into Redondo Beach's daily management of its community

and municipal operations. The Climate Action Plan includes a list of non-binding goals and strategies related to transportation:

- Facilitate pedestrian and neighborhood development.
- Identify ways to reduce automobile emissions including:
  - Supporting zero emission vehicle infrastructure;
  - Improving pedestrian and bicycle infrastructure;
  - Enhancing public transit service; and
  - Supporting reductions in single-occupancy vehicle use.

*Transportation Demand Management (TDM)*

Redondo Beach Municipal Code (RBMC) Section 10-2.2406 requires nonresidential developments of 25,000 square feet (sf) or more to provide TDM measures to reduce the number of vehicles traveling to and from the project site. The proposed Project consists of 389,720 sf of new mixed-use development. The following is required of nonresidential developments greater than 100,000 sf:

- A bulletin board, display case, or kiosk displaying transportation information located where the greatest number of employees are likely to see it.
- Not less than 10 percent of the employee parking area, shall be located as close as is practical to the employee entrance(s), and shall be reserved for use by potential carpool/vanpool vehicles, without displacing handicapped and customer parking needs. This preferential carpool/vanpool parking area shall be identified on the site plan upon application for building permit, to the satisfaction of the City. A statement that preferential carpool/vanpool spaces for employees are available and a description of the method for obtaining such spaces must be included on the required transportation information board. Spaces will be signed/striped as demand warrants; provided that at all times at least one space for projects of 50,000 sf to 100,000 sf and two spaces for projects over 100,000 sf will be signed/striped for carpool/vanpool vehicles.
- Preferential spaces reserved for vanpools must be accessible to vanpool vehicles and adequate turning radii and parking dimensions shall be included.
- A safe and convenient on-site zone in which vanpool and carpool vehicles may deliver or board their passengers.
- Bicycle racks or other secure bicycle parking shall be provided to accommodate four bicycles for the first 50,000 sf of nonresidential development and one bicycle per each additional 50,000 sf of nonresidential development.

- Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development.
- If determined necessary by the City to mitigate the project impact, bus stop improvements must be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances must be designed to provide safe and efficient access to nearby transit stations or stops.
- Safe and convenient access from the external circulation system to bicycle parking facilities on site.

City of Torrance Local Policies and Regulations

*Torrance General Plan Circulation and Infrastructure Element*

The Torrance General Plan Circulation and Infrastructure Element describes the goals and policies needed to attain circulation objectives and introduces other techniques that can be used to improve traffic flow. As discussed in the General Plan, policies pertaining to improving circulation are addressed in multiple chapters of the General Plan. Objectives and associated policies are presented below (City of Torrance 2010).

Objective CI.4: To provide a safe, efficient, and comprehensive circulation system that serves local needs, meets forecasted demands, and reduces traffic impacts on neighborhoods.

Policy CI.4.1 Protect residential neighborhoods from cut-through traffic by enhancing the capacity of Arterials and Collectors, improving signage, guiding traffic away from residential areas, and employing appropriate traffic-calming methods based on identified needs.

Policy CI.4.7 Consider all alternatives for increasing street capacity before widening is pursued for streets that immediately serve residential neighborhoods.

The City also has a target for intersection operation, which is LOS *"D"* or better. The LOS *"D"* objective for the roadway system design reflects the City's desire to maintain stable traffic flow, realizing that peak-hour congestion may occur at locations near freeways or other locations with unusual traffic characteristics due to regional traffic flow. Unrelated to CEQA, plan, policy, and regulatory consistency with these thresholds of significance would be determined as part of the review and approval process with the City of Torrance decision-makers during consideration of

discretionary approvals for the Phase 1 preliminary site development plan. The Operational Intersection Analysis may be used to help inform that decision (see Appendix J).

*Torrance Climate Action Plan*

The Torrance Climate Action Plan was prepared by the City in concert with SBCCOG and was adopted in 2017. The Climate Action Plan includes a list of non-binding goals and strategies related to transportation, which are the same as those in the Redondo Beach Climate Action Plan as described above.

*Hawthorne Boulevard Corridor Specific Plan*

The City of Torrance adopted the Hawthorne Boulevard Corridor Specific Plan in 1996 in order to guide future decision-making regarding land use, development, transportation, streetscape, and other public improvements within the Hawthorne Boulevard Corridor Specific Plan Area. The plan area runs along Hawthorne Boulevard and extends from Redondo Beach Boulevard in the north to Rolling Hills Road in the south, encompassing the Del Amo Fashion Center, the Civic Center, Madrona Marsh, and Torrance Municipal Airport. Relevant goals and policies of the plan include the following:

| | |
|---|---|
| Policy 6-2 | Minimize potential conflicts between through traffic on Hawthorne Boulevard and turning traffic, between vehicles and pedestrians, and between traffic and stopped transit vehicles. |
| Policy 6-4 | Avoid the intrusion of through traffic in residential areas. |

### 3.14.3 Impact Assessment and Methodology

<u>Thresholds of Significance</u>

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on transportation if it would do any of the following:

a) Conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

As previously described, CEQA Guidelines Section 15064.3(a) establishes increases in VMT as the most appropriate measure of transportation impacts, and states that other considerations may include effects on transit and non-motorized travel. VMT as a metric for impacts is consistent with a broad range of State legislation, regional, and local programs, and plans and policies, and the CEQA Guidelines also require consideration of whether a project may conflict either directly or indirectly with plans, policies, programs, or ordinances addressing circulation, particularly related to increases in VMT and associated reductions in GHG generation. The State has set ambitious targets for reductions in GHG generation, which in turn relates to transportation and required reductions in VMT, because transportation is the largest generator (41 percent) of GHGs by sector in the State. Thus, legislation, programs, plans and policies which target GHG emissions and climate change relate directly to transportation and the need to reduce VMT. Regarding VMT, CEQA Guidelines Section 15064.3(b) provides Criteria for Analyzing Transportation Impacts. Applicable guidance includes the following:

- **Land Use Projects.** VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5-mile radius of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
- **Qualitative Analysis.** If existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
- **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's VMT and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate VMT and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in CEQA Guidelines Section 15151 shall apply to the analysis described in this section.

*OPR's Recommendations for Transportation Impact Criteria*

As explained above in Section 3.14.2, *Regulatory Setting*, in September 2013, SB 743 directed OPR to revise the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. In developing the criteria, OPR proposed, and in December 2018 the California Natural Resources Agency certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project's transportation impacts. CEQA Section 15064.3 defines VMT as *"the amount and distance of automobile travel attributable to a project"* and notes that for determination of significance for transportation impacts, *"[o]ther relevant considerations may include the effects of the project on transit and non-motorized travel."*

VMT replaced analysis of roadway capacity-based or automobile delay-based LOS, as the CEQA metric for transportation impact from land use projects. That is because LOS measures a project's impact on the driving experience of other vehicle drivers (e.g., congestion, delay, etc.) and favors development in exurban areas where existing roadway traffic is light, often leading to longer vehicle trips, or resulting in road-widening projects, which result in adverse environmental and public health impacts through induced vehicle demand and degradation of the biking or walking experience. By contrast, evaluation of a project's impact as measured by VMT evaluates the effect on the environment of project-generated vehicle trips, such as more and/or longer vehicle trips which emit more GHGs, or projects which generate fewer vehicle trips or shorten existing trips such as development of an infill site or facilities that improve bicycle access or walkability.

While OPR recognizes that lead agencies have the discretion to set or apply their own thresholds of significance, the Proposed Transportation Impact Guidelines include recommendations regarding significance thresholds for residential, office, and retail projects. For residential and office projects, the Proposed Transportation Impact Guidelines recommend that a significant impact occurs when a project's VMT exceeds a level of 15 percent below the existing regional or city VMT per capita and per employee, respectively. This target reduction is consistent with the overall VMT reduction goals of the 2017 CARB Scoping Plan. For retail and redevelopment projects, the Guidelines recommend that a significant impact would occur with any net increase in total VMT. The guidelines also recommend significance thresholds for land use plans. A general plan, area plan, or community plan may have a significant impact on transportation if proposed new residential, office, or retail land uses would in aggregate exceed the respective thresholds recommended above.

BCHD does not have adopted CEQA impact criteria for transportation. As the lead agency responsible for preparing the EIR, BCHD has the discretion to select its impact criteria, and use

relevant and defensible sources. BCHD has reviewed and is following OPR's Technical Advisory. The City of Redondo Beach's in-progress guidelines for VMT impact analysis are also being monitored and the currently considered version is applied to this EIR's ~~the~~ VMT analysis, as further described below.

*City of Redondo Beach Draft VMT Thresholds*

The VMT impact analysis contained in this report considers the City of Redondo Beach's ongoing efforts to develop new transportation analysis guidelines to comply with SB 743 and is consistent with the draft screening methodologies and impact criteria that were presented to the Redondo Beach City Council on November 10, 2020.

While not yet adopted, the Redondo Beach City Council has provided concurrence with the use of the following screening and significance thresholds:

- **Screening criteria:** Several VMT screening options are currently under consideration by the City of Redondo Beach. If a project meets [one or more of] the screening criteria, it would not be required to conduct a VMT impact analysis. The screening options presented to the City Council included:
    - Small Project screening (less than 110 net daily trips);
    - Locally serving retail (10,000 sf or less); or
    - Low VMT Area (based on data from the SCAG Regional Travel Demand Model). The County defines a Low VMT Area in accordance with CARB's recommendation of 16.8 percent below the County's baseline VMT. The City of Redondo Beach has selected the same threshold in order to be consistent with the County's approach and to support State climate goals.
- **Thresholds of Significance:** For projects that do not meet the screening criteria above, the threshold of significance would be 16.8 percent below the baseline existing conditions. CARB has modeled foreseeable emission reductions associated with existing mobile-source regulations and different combinations of advancements in technologies, fuels, and transportation system efficiencies. The results of CARB's modeling show that a 16.8 percent reduction from existing levels in VMT per capita for light-duty vehicles is needed in order to achieve the State required target of 80 percent reduction in GHGs by 2050. CARB's recommendations are slightly higher than OPR's recommendations (i.e., 15 percent below baseline conditions) because the research is based on meeting slightly different goals.

While not yet adopted, the Redondo Beach City Council has confirmed that SBCCOG should be the geographic area to be used as a baseline for comparing project-related VMT performance in the determination of a potentially significant VMT impact. Using the 2016 SCAG Regional Travel Demand Model, Fehr & Peers estimated average VMT per capita and per employee for the SBCCOG region (see Table 3.14-5). Consistent with the in-progress criteria being considered by the City of Redondo Beach and using their draft guidance, a significant project-related VMT impact would occur if a project's home-based work VMT per employee is greater than 15.3 or a project's home-based VMT per capita is greater than 11.1. Home-based work VMT includes only vehicle roundtrips between the residence of the trip-maker and their place of work. Home-based VMT includes all vehicle roundtrips originating from the residence of the trip-maker.

**Table 3.14-5. City of Redondo Beach Draft VMT Impact Thresholds of Significance**

| VMT Metrics | SBCCOG Average VMT | | Percent Change |
|---|---|---|---|
| | 2016 Baseline | 2040 Forecast | |
| **Home-Based Work VMT per Employee** | **18.4** | **13.7** | **-25.5%** |
| *Threshold of Significance (16.8% below)* | *15.3* | *11.4* | |
| **Home-Based VMT per Capita** | **13.3** | **11.3** | **-15.0%** |
| *Threshold of Significance (16.8% below)* | *11.1* | *9.4* | |

Sources: Fehr & Peers 2021a; SCAG 2016.

As described in Table 3.14-5, home-based work VMT per employee is forecast to be reduced by 25.5 percent and home-based VMT per capita is forecast to be reduced by 15 percent in the SBCCOG region by 2040. As such, a project's potential to increase VMT is greater using the (2016) base-year model, rather than the cumulative (2040) forecast. Given this characteristic, the City of Redondo Beach Draft VMT Guidelines require that a project's VMT impact analysis be conducted using the (2016) base-year model.

Methodology

The scope of work for the Transportation Study prepared for the proposed Project was determined in consultation with BCHD, the City of Redondo Beach, and City of Torrance to inform the transportation impact analysis, consistent with the requirements CEQA. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed via feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis.

*Plans, Ordinance, and Policy Consistency*

The plan, ordinance, and policy consistency analysis assesses whether a project would conflict with an adopted plan, ordinance, and policy addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities as required under CEQA) that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT. A project that does not implement a program, plan, policy, or ordinance would not necessarily result in a conflict or an impact. Many of these programs must be implemented by the City of Redondo Beach and the City of Torrance themselves over time and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the cities from implementing adopted programs, plans, and policies.

This analysis of land use consistency considers whether the proposed Project would be consistent with applicable plans, policies, and regulations. Sources utilized in the development of this section include SCAG's RTP/SCS, Metro's 2020 LRTP, the South Bay Bicycle Master Plan, the Redondo Beach General Plan, and the Torrance General Plan and Hawthorne Boulevard Corridor Specific Plan. Plan and policy consistency are based on whether the proposed Project would result in environmental impacts to transportation as outlined in the applicable plan.

*Vehicle Miles Traveled*

The potential impacts of Project-related VMT are assessed in the context of CEQA Section 15064.3 and CEQA Appendix G, as well as the City of Redondo Beach's Draft VMT Guidelines. The analysis also accounts for the goals or State, regional, and local plans regarding reduction targets for VMT and GHG emissions, including the 2017 CARB Scoping Plan target VMT reduction of 15 percent.

The OPR Technical Advisory describes the following components of a VMT analysis necessary to comply with the new CEQA guidelines:

- **VMT Screening & Qualitative Review.** The first step is to determine when a VMT analysis is required. OPR recommends that projects be screened from a VMT analysis based on their size, location, and/or accessibility to transit. If a project does not meet the screening criteria requiring a VMT analysis, it can be presumed to have a less than significant impact under this impact criterion.
- **VMT Analysis Methodology.** If a project is not screened from requiring a VMT analysis, a regional travel demand model is typically used to estimate a project's VMT. OPR

recommends that VMT be reported as *"Home-Based Work VMT"* per employee for the employees of a project site and *"Home-Based VMT"* per capita for residential projects.

Based on OPR's Technical Advisory and the City of Redondo Beach's Draft VMT Guidelines, the following screening methods were used to analyze the proposed Project: Small Project Screening and Low VMT Area Screening. The analysis also discusses average trip length for trips generated by the proposed Project as compared to regional average trip lengths in the SBCCOG service area.

*VMT Screening & Qualitative Review*

As described above, the City of Redondo Beach's Draft VMT Guidelines consider several VMT screening options, which evaluate whether a VMT impact analysis is required for a project. If a project meets the screening criteria, it would not be required to conduct a VMT impact analysis. The screening options include small project (less than 110 net daily trips), locally serving retail (10,000 sf or less), and low VMT area screening. Because the proposed Project is not a locally serving retail development, the small project screening and low VMT area screening are evaluated for the proposed Project below.

The proposed Project's generation of daily vehicle trips was estimated to evaluate whether the Project meets the criteria for the small project screening. Trip Generation, 10th Edition (Institute of Transportation Engineers [ITE] 2017) represents the industry standard for estimating trip generation and is based on a compilation of empirical (i.e., observed) trip generation surveys at locations throughout the country. While ITE Trip Generation is a defensible approach, ITE always recommends utilizing local data where it is available. Based on input from the City of Redondo Beach and the City of Torrance, an empirical trip generation study was conducted at the campus to validate and calibrate ITE trip generation rates to reflect accurate existing site conditions.

- **DATA USED TO CALIBRATE TRIP GENERATION RATES:**
  - Driveway Counts
  - Pedestrian Surveys
  - CHF Membership Scans
  - BCHD Programming Information
  - Bollard King & Associates Market Feasibility Study

Driveway counts were collected at the Project site over a period of 24 hours on a typical weekday in October 2019 (see Appendix K). While the driveway counts can be used for validating overall campus trip generation, they do not allow for the analysis of trip generation by individual land use type at the campus. In order to assess the difference in trip generation by land use type, 24-hour pedestrian counts were conducted at the entrances to each building on campus on the same day as the driveway counts. Because the buildings at 510 North Prospect Avenue and 520 North Prospect Avenue both contain exclusively medical office uses, pedestrian counts at those buildings were used to develop a site-specific medical office trip rate to compare

with ITE trip generation rates for medical office uses. Pedestrian trips to the Beach Cities Health Center (514 North Prospect Avenue) could not be fully isolated by land use due to the mix of land use types within the building. However, the Child Development Center has a dedicated entrance to the Beach Cities Health Center. Therefore, pedestrian counts at that entrance were isolated and compared with ITE trip generation rates for day-care center uses. Membership scans of the Center for Health and Fitness (CHF) were used to estimate isolated trip counts for that land use and compare with ITE trip generation rates for health centers/gyms. Trip counts for the remaining uses within the Beach Cities Health Center (i.e., office/administrative, memory care, etc.) could not be isolated by land use type and individually compared with the respective ITE trip generation rate. Therefore, these land use types were collectively counted and compared to ITE trip generation rates. ITE trip generation rates were applied to each existing land use at the campus based on the existing occupied floor area of each land use type.

Using the ITE trip generation rates, the existing campus is estimated to generate 5,854 daily trips, including 530 AM peak period trips, and 637 PM peak period trips. However, the results of the 24-hour site-specific driveway and pedestrian counts showed that the campus generates 6,713 daily trips, 610 AM peak period trips, and 455 PM peak period trips in one day. Therefore, the driveway and pedestrian counts revealed that the campus generates 16 percent more daily trips, 13 percent more AM peak period trips, and 29 percent fewer PM peak period trips than the ITE trip generation rates estimated. Using the empirical driveway and pedestrian counts, Fehr & Peers calibrated the ITE trip generation rates in order to more accurately reflect existing trip generation at the campus. The calibrated trip rates were used to estimate projected trip generation for the proposed Project by phase.

Trip generation estimates for new uses were based on available programming information provided by BCHD. ITE does not provide a trip generation rate for aquatic centers such as the one proposed as part of the Phase 2 development program. Therefore, BCHD hired Ballard King & Associates to prepare a market feasibility study, which includes preliminary findings of the market assessment used by Fehr & Peers to estimate potential trip generation (see Appendix K).

Using the calibrated trip generation rates, it was determined that 3,284 of the total existing daily vehicle trips are generated from land uses within the Beach Cities Health Center. Phase 1 of the proposed Project would demolish the Beach Cities Health Center and subsequently remove these 3,284 daily vehicle trips from the roadway network. (The remaining 3,429 existing daily trips are generated by the medical office uses at 510 North Prospect Avenue and 520 North Prospect Avenue, which would remain in operation under Phase 1 of the proposed Project.)

**Table 3.14-6. Phase 1 Project Net Trip Generation**

| | Trip Generation | | |
|---|---|---|---|
| | **Daily** | **AM Peak Period** | **PM Peak Period** |
| ***Existing Trips to be Removed*** | | | |
| Beach Cities Health Center | 3,284 | 307 | 222 |
| ***Phase 1 Trips to be Added*** | | | |
| RCFE Building | 1,365 | 73 | 64 |
| *Phase 1 Net Trip Generation* | *-1,919* | *-235* | *-158* |

Source: Fehr & Peers 2021a.

During operation of the Phase 1 preliminary site development plan, the proposed uses within the Residential Care for the Elderly (RCFE) Building which would replace the Beach Cities Health Center are expected to generate 1,365 daily vehicle trips, including 73 AM peak period trips and 64 PM peak period trips (refer to Table 3.14-6; see Appendix K). The net trip generation, which is calculated by subtracting the existing trips generated by the Beach Cities Health Center from the estimated trips that would be generated by the proposed RCFE Building, is expected to be negative. This means that more vehicle trips would be removed from the roadway network than the number of trips that would be added to the roadway network from operation of the proposed RCFE Building. Implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). This is in part because Phase 1 of the proposed Project would replace high trip generating land uses (e.g., medical office), with lower trip generating land uses (e.g., Assisted Living units). This reduction in daily vehicle trips is also attributed to the demolition of a large number of existing uses within the Beach Cities Health Center and the construction of only a small portion of the proposed BCHD Healthy Living Campus Master Plan. Because Phase 1 would result in a substantial reduction of Project-related vehicle trips as compared to existing trip generation at the Project site, Phase 1 would generate fewer than 110 net new trips, falling below the threshold identified by OPR and the City of Redondo Beach for small project screening.

However, after completion of Phase 2, the proposed Project is expected to generate a total of 3,360 daily vehicle trips, including 271 AM peak period trips and 195 PM peak period trips (see Table 3.14-7; see Appendix K). After accounting for existing trips being removed from the roadway network, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate a net increase of 376 new daily trips as compared with existing conditions. Given that the proposed Project would generate a net increase in daily trip generation, and the number of net new trips would exceed the 110 daily trip threshold

identified by OPR and the City of Redondo Beach for small project screening, the proposed Project – including the Phase 1 preliminary site development plan as well as the Phase 2 development program – cannot be assumed to result in a less than significant impact and the proposed Project is not exempt from requiring a VMT impact analysis.

**Table 3.14-7. Total Net Trip Generation Resulting from the Proposed Project**

| VMT | Trip Generation | | |
|---|---|---|---|
| | **Daily** | **AM Peak Period** | **PM Peak Period** |
| ***Existing Trips to be Removed*** | | | |
| Beach Cities Health Center | 3,284 | 307 | 222 |
| ***Proposed Phase 1 and Phase 2 Trips to be Added*** | | | |
| Phase 1 | 1,365 | 73 | 64 |
| *Phase 1 Net Trip Generation* | *-1,919* | *-234* | *-158* |
| Phase 2 | 3,660 | 271 | 195 |
| *Phase 2 Net Trip Generation* | *376* | *-37* | *-28* |
| **Total Net Trip Generation Resulting from the Proposed Project** | **376** | **-37** | **-28** |

Note: 3,429 existing daily trips are generated by the medical office uses at 510 North Prospect Avenue and 520 North Prospect Avenue, which would remain in operation under the proposed Project. The Beach Cities Advanced Imaging Building (510 North Prospect Avenue) may be redeveloped under the Phase 2 development program; however, it would be replaced with identical medical office uses and would not result in a change in associated trip generation rates.
Source: Fehr & Peers 2021a.

- **TRANSPORTATION ANALYSIS ZONES:** Geographic polygons representing communities and neighborhoods at a sub-city level of detail.

OPR guidance also states that residential and office projects located within an area that generates low VMT may be presumed to have a less than significant impact and could be screened from a VMT impact analysis. Other employment-related and mixed-use projects may qualify for low VMT area screening if the project is expected to generate VMT per resident or per worker similar to the existing land uses in the low VMT area. As previously described, the County and the City of Redondo Beach define a low VMT area as a transportation analysis zone (TAZ) that generates VMT on a per capita/employee basis that is at least 16.8 percent lower than the regional average. Pursuant to the City of Redondo Beach's Draft VMT Guidelines, the average VMT in the SBCCOG area is used as the regional baseline for comparing Project-related VMT performance.

Using the SCAG Regional Travel Demand Model, Fehr & Peers calculated employment-related (home-based work) VMT per employee and population-related (home-based) VMT per capita for the TAZ that encompasses the Project site (Project TAZ). Home-based work and home-based VMT generated within the Project TAZ were compared to the SBCCOG regional average home-based work and home-based VMT, respectively (see Table 3.14-8).

- **VMT IMPACT ANALYS METRICS:** VMT impact analysis assesses the Vehicle Miles Travelled (VMT) per person (capita), or per employee per day, or total VMT. For residential projects the metric used is *"VMT per capita."* For office projects, the metric used is *"VMT per employee."* For retail projects, the metric is *"total VMT."* For other land uses not specified in the OPR guidance, the metric best fitting the predominant trip-making variable for that use shall be used.

**Table 3.14-8. Low VMT Area Screening for Project TAZ**

| VMT Type | SBCCOG Average | Project TAZ | % Difference |
|---|---|---|---|
| Home-Based Work VMT per Employee | 18.4 | 14.9 | -19% |
| Home-Based VMT per Capita (Population) | 13.3 | 12.7 | -5% |

Sources: Fehr & Peers 2021a; SCAG 2016.

Home-based work VMT generated within the Project TAZ is more than 16.8 percent lower than the regional average (refer to Table 3.14-8). Therefore, the Project TAZ is considered a low VMT area for home-based work VMT. However, the home-based VMT generated within the Project TAZ is only 5 percent lower than the regional average (refer to Table 3.14-8). Therefore, the Project TAZ does not meet the screening criteria for low VMT screening and would not be identified as a low VMT area for home-based VMT. The City of Redondo Beach has provided direction that low VMT area screening should only be applied to mixed-use projects if all components of the project can be screened. Therefore, the proposed Project, which contains both employment-related and residential-related uses, does not meet the screening criteria for low VMT area screening.

*VMT Analysis Methodology*

Fehr & Peers calculated VMT associated with the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – using the SCAG Regional Travel Demand Model. The socioeconomic data for the Project TAZ was updated within the model to account for Project-related employment and the Assisted Living residents that would not require on care services. These residents would have access to their own vehicles and therefore could generate home-based VMT per capita. The remaining residents of the proposed Assisted Living and Memory Care units would not be expected to generate home-based VMT since they would be less mobile. Fehr & Peers ran the SCAG Regional Travel Demand Model to calculate

Project TAZ home-based work VMT per employee and home-based VMT per capita with the Project-related socioeconomic data changes (see Table 3.14-9).

**Table 3.14-9. Project TAZ VMT Estimates**

| VMT Metrics | VMT Estimates |
|---|---|
| Project TAZ Home-Based VMT per Capita | 12.8 |
| Project TAZ Home-Based Work VMT per Employee | 14.8 |

Sources: Fehr & Peers 2021; SCAG 2016.

As described in Table 3.14-10 below, the ITE trip generation rates vary widely between the types of residential land uses considered by SCAG (single-family homes and multi-family low-rise developments) and the types of residential uses included in the proposed Project (senior adult housing and assisted living). According to ITE trip generation data, Assisted Living uses generate only 35 percent of the daily trips of typical multi-family housing (see Table 3.14-10).

**Table 3.14-10. ITE Residential Daily Trip Generation Rates**

| ITE Code | Land Use | Unit of Measure | Daily Trips |
|---|---|---|---|
| 210 | Single Family Housing (Detached) | DU | 9.44 |
| 220 | Multi-Family Housing (Low-Rise) | DU | 7.32 |
| 252 | Senior Adult Housing (Attached) | DU | 3.70 |
| 254 | Assisted Living | Beds | 2.60 |

Source: ITE 2017.

While ITE only considers the numbers of trips generated by various land uses, the VMT analysis prepared by Fehr & Peers assumes that the characteristics of those trips (e.g., trip purpose and length) are similarly varied. For example, residents of single-family homes and multi-family low-rise developments may travel long distances daily for work and may group different purpose trips together (e.g., school or child care drop-offs and pick-ups with errands along the way), whereas retired residents of adult independent communities may make only short trips to one or two destinations per day, such as the local grocery store or a doctor's appointment.

In order to more accurately evaluate VMT generated by the proposed Project, Fehr & Peers also obtained average trip length data for the campus using StreetLight location-based service data from 2019, prior to the onset of the COVID-19 pandemic. Using the StreetLight portal, Fehr & Peers mapped the relative weight of the origin/destination grid cells to and from the campus.

- **SCAG REGIONAL TRAVEL DEMAND MODEL:** SCAG forecasts travel behavior for the Southern California Region using computer-based software programs also known as the Regional Travel Demand Model. The Regional Travel Demand Model provides a common foundation for transportation planning and decision-making by SCAG and other agencies within the Region.
- **STREETLIGHT DATA:** StreetLight is a data vendor that aggregates and summarizes origin destination data using cell phone and app location-based data (e.g., Google Maps) to quantify and measure the travel patterns for a given location. (These data are aggregated into grid cells to maintain individual user privacy.) Unlike the modeled regional data provided by SCAG, StreetLight data are recorded, location specific data that provide for a more refined understanding of trip-making characteristics on a local level.

BCHD serves members of the Beach Cities (i.e., Redondo Beach, Hermosa Beach, and Manhattan Beach) communities as well as other South Bay communities. By nature of its service area, BCHD generates a shorter average trip length than typical uses in the SBCCOG subregion. According to the StreetLight portal, the areas (i.e., grid cells) with the greatest share of travel to and from the Project site are clustered within the Beach Cities and adjacent communities. Select grid cells beyond these nearby communities indicate likely concentrations of BCHD employees commuting to and from the Project site; however, these areas are scattered with small shares of travel to and from the campus. The StreetLight data revealed that the average weekday trip length to and from the campus is 6.4 miles, and the average weekend trip length is 6.3 miles. Given that the proposed Project would redevelop the existing campus with uses that would continue to serve the Beach Cities and surrounding South Bay communities, existing trip lengths are likely to remain similar under the proposed Project. The existing average weekday trip length for the campus is 65.2 percent lower than SBCCOG regional home-based work VMT per employee (refer to Table 3.14-5).

To further evaluate whether the Assisted Living and Memory Care residents of the proposed Project would generate less VMT per capita than the SCAG Regional Travel Demand Model's estimates for residential uses, StreetLight data were evaluated for Brookdale South Bay located at 5481 West Torrance Boulevard in Torrance. Brookdale South Bay provides independent Assisted Living units. Therefore, Brookdale South Bay was determined to have representative data for average trip lengths associated with residents of the proposed Project. Fehr & Peers calculated an average trip length of 4.8 miles using the StreetLight data for Brookdale South Bay.

The VMT impact analysis under Impact T-2 compares Project TAZ home-based work VMT per employee and home-based VMT per capita to the regional averages within the SBCCOG to

determine the significance of the increase in VMT associated with the proposed Project (see Table 3.14-11)

*Geometric Design Feature or Incompatible Use Hazards & Emergency Access*

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project site. Impacts can be related to vehicle-vehicle, vehicle-bicycle, or vehicle-pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. These impacts are evaluated for both temporary conditions during Project construction and permanent conditions after buildout of the Phase 1 preliminary site development plan and the more general Phase 2 development program under the proposed Project.

Project access plans are reviewed in light of commonly accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant. The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at campus access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the Project site, and the visibility of cars to pedestrians and bicyclists.
- Emergency access is analyzed with consideration of the routes of ingress/egress to the Project site, evaluating the potential limits to access for emergency personnel and site evacuation.

*Cut-Through Traffic*

As described in Section 3.14.1, *Environmental Setting*, the City of Torrance conducted license plate surveys during the AM and PM peak periods at four locations on the boundary of the Torrance neighborhood to the east of the campus to evaluate cut-through traffic between Beryl Street and Del Amo Boulevard. Independent of the City of Torrance's license plate surveys, Fehr & Peers also collected neighborhood street segment counts on a number of roadways in the Torrance neighborhood. The streets considered in these counts include, but are not limited to, Flagler Lane between Beryl Street and Towers Street, and Redbeam Avenue between Norton Avenue and Del Amo Boulevard. The counts were collected in January 2020, prior to the onset of

the COVID-19 pandemic, and on a weekday during a non-holiday week when schools were in session.

Most cut-through traffic occurs when congestion is high on arterial streets, particularly during commute AM and PM peak periods. As identified within the City of Torrance's license plate surveys, between 31 percent and 47 percent of vehicles traveling through the Torrance neighborhood contribute to cut-through traffic. Assuming cut-through traffic remained constant throughout the day, Fehr & Peers assumed a blended cut-through rate of 37.5 percent of vehicles contribute to cut-through traffic during the midday period between 9:30 a.m. and 4:00 p.m. However, cut-through traffic typically occurs most often during peak commute periods when drivers may attempt to bypass congested locations; therefore, midday cut-through traffic would likely be lower than the AM and PM peak period percentages identified by the City of Torrance.

### 3.14.4 Project Impacts and Mitigation Measures

Impact Description (T-1)

a) *The project would conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.*

**T-1** **The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not cause significant environmental impacts due to conflicts with any transportation plan, policy, or regulation. Therefore, impacts would be *less than significant with mitigation*.**

The CEQA Guidelines state that a project would have a potentially significant impact if the project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Redondo Beach and Torrance have adopted plans, ordinances, and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible, and sustainable transportation system for all users. In compliance with CEQA, this analysis also assesses consistency with applicable plans in the vicinity of the Project site.

As described in Section 2.5.1.5, *Sustainability Features*, the proposed Project would implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site. While the proposed Project would not generate daily vehicle trips or VMT that would result in a significant transportation impact (see Impact T-2), the TDM plan is included as a recommended mitigation measure that provides additional information on the proposed TDM

measures pursuant to the requirements of RBMC Section 10-2.2406. The TDM plan would also encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being. For example, BCHD would provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings as well as bicycle facilities, such as bicycle parking, a bicycle repair station, and employee shower and locker facilities. The TDM plan would also include transit and carpool incentives for employees, such as subsidized Beach Cities Transit passes and designated parking for vanpools and carpools. The Assisted Living, Memory Care, and PACE services would also share and use vans to transport several participants at once, which would reduce vehicle trips to the campus. BCHD would provide incentives to guests and employees for hybrid and/or electric car parking. The proposed Project would also include ride-share amenities as well as an emergency ride home program for employees and visitors. See MM T-1 for a list of measures that would be considered in the required TDM plan.

Although the proposed Project would generate 376 net new daily vehicle trips and incrementally increase VMT, it would be substantially consistent with adopted plans and policy framework established in Connect SoCal, Metro's 2020 LRTP, the South Bay Bicycle Master Plan, Redondo Beach General Plan Circulation Element, Torrance General Plan Circulation and Infrastructure Element, and Torrance Hawthorne Boulevard Corridor Specific Plan. Therefore, a comprehensive analysis of consistency with applicable long-range planning documents and policies is provided in Section 3.10, *Land Use and Planning*. This analysis includes a rigorous discussion of consistency with development standards, including design guidelines and vehicle trip reduction strategies, to minimize transportation impacts associated with the proposed Project. In addition, because the South Bay Bicycle Master Plan currently does not provide specific policies or goals for individual development projects, this analysis describes how the proposed Project would support the overall goal of this plan. As discussed in further detail below, the proposed Project is consistent with all applicable development standards, design guidelines, and other transportation-related strategies.

*Connect SoCal*

Connect SoCal aims to reduce or limit new trip generation and associated regional growth in traffic congestion and VMT by focusing growth, density, and land use intensity within existing urbanized areas. Connect SoCal also strives to enhance the existing transportation system, maximize multi-modal transportation, and integrate land use into transportation planning. The RTP/SCS recommends local jurisdictions accommodate future growth within existing urbanized areas to reduce VMT, congestion, and GHG emissions. The proposed Project supports these goals by redeveloping an existing developed site with a mix of residential, community service, medical

office, and community health and wellness uses in close proximity to several stops along Beach Cities Transit Line 102, which are within walking distance of the Project site. The proposed Project would also encourage pedestrian activity through the provision of 114,830 sf of pedestrian-only on-site open space. The proposed Project would also provide electric vehicle (EV) charging stations and bicycle parking spaces for visitors and employees improving overall access to active bicycle facilitates. As described in Section 3.10, *Land Use and Planning* the proposed Project would be consistent with all applicable goals of Connect SoCal.

*Metro 2020 Long Range Transportation Plan*

Metro's 2020 LRTP focuses on improving transportation and the environment with the implementation of trip reduction strategies and TDM measures, such as transit-oriented development (TOD), to reduce single-occupant vehicle trips and VMT. While the area within the vicinity of the Project site is generally transit poor, lacking multiple transit routes, the proposed Project would support transit-oriented communities by developing 157 new residential units, new jobs, and community center uses conveniently located in close proximity to residential and commercial land uses and adjacent to several stops along the Beach Cities Transit Line 102. As previously described, the proposed Project would implement a TDM plan (see recommended MM T-1) with transit and carpool incentives for employees (e.g., designated parking for carpools and vanpools on-site), shared vans to transport several Assisted Living, Memory Care, and PACE participants at once, and ride-share pick-up amenities (e.g., the main entrance roundabout and passenger drop off driveway). The proposed Project would also reduce vehicle trips and VMT by providing publicly accessible ground-level open space with pedestrian pathways and on-site bicycle facilities (e.g., bicycle parking, employee showers and lockers, etc.) to encourage active transportation to and from the Project site. Therefore, the proposed Project would enhance active transportation usage in the vicinity of the Project site, and would be consistent with the goals of the LRTP.

*South Bay Bicycle Master Plan*

The Project site is located adjacent to the Class II bicycle lanes on Diamond Street and Beryl Street as well as the informal bike path along Flagler Alley. Implementation of the proposed Project would not physically interfere with any future bicycle facilities identified in the South Bay Bicycle Master Plan. The proposed Project would also not conflict with local goals and policies to increase bicycle trips in the cities of Redondo Beach and Torrance. Rather, the proposed Project would encourage employees, tenants, and visitors to use existing bicycle facilities throughout the area through implementation of a TDM plan and the provision of on-site bicycle amenities such as

secure bicycle parking, showers, and personal locker facilities. Therefore, the proposed Project would support the goals and actions of the South Bay Bicycle Master Plan.

*Redondo Beach General Plan Circulation Element*

The Redondo Beach General Plan Circulation Element serves as a planning document governing the transportation networks within Redondo Beach. The Circulation Element establishes goals related to reducing trip generation, promoting alternative modes of transportation, expanding TDM, and coordinating transportation and land use planning. The complete list of the goals and policies adopted by the City of Redondo Beach is described in Section 3.10, *Land Use and Planning*. As discussed in Section 3.10, *Land Use and Planning* implementation of the proposed Project would be consistent with the City of Redondo Beach's goals, policies, and programs for transportation management, alternative transportation, and walkable communities.

One of the stated goals of the Redondo Beach General Plan Circulation Element is the City-wide goal to encourage all employers to pursue TDM measures already demonstrated to be successful in Southern California, such as the implementation of flexible hours in work environments, incentives for employer-based carpools and vanpools, and shared transportation vehicles. The proposed Project would maximize mobility and accessibility through implementation of a TDM plan (see recommended MM T-1), which would include trip reduction strategies, such as transit and carpool incentives for employees (e.g., designated parking for carpools and vanpools on-site), to reduce single-occupancy vehicle trips to the Project site. Additionally, the Assisted Living, Memory Care, and PACE services developed during Phase 1 would share vans to transport several participants at once, which would reduce vehicle trips to the campus. A majority of the campus employees would continue to work with a flexible schedule, which allows an employee to work hours that differ from the normal company start and stop time to reduce peak period vehicle trips and associated roadway congestion.

The Redondo Beach General Plan Circulation Element also establishes the goal to reduce Year 2030 trip generation by 25 percent compared to 2007 levels. This goal will be achieved by changing travel behavior associated with both existing and future development in Redondo Beach. To achieve the goal of reducing Year 2030 trip generation by 25 percent compared to 2007 levels, the Circulation Element provides a framework for integrating land use and transportation to reduce vehicle trips; encouraging walking, bicycling, and transit use; and creating active, pedestrian-oriented neighborhoods. The proposed Project is expected to reduce daily vehicle trips during operation of Phase 1 as compared to existing conditions and would generate an increase of only 95 daily vehicle trips during operation of Phase 2 (see Impact T-2). The Circulation Element goal

of reducing Year 2030 trip generation by 25 percent compared to 2007 levels is not a requirement to be applied on a project-by-project basis. Rather, the intent of this goal is to reduce vehicle trips for existing and future uses on a City-wide basis through implementation of land use and transportation policies, programs, and projects that support and invest in the transportation system. The Circulation Element encourages that new projects be designed to support the use of alternative forms of transportation by providing housing, jobs, and local-serving community services in close proximity to public transit and incorporating design elements that would encourage walking and bicycling. As previously described, the proposed Project would be served by Beach Cities Transit Line 102. The proposed Project would also promote active and multi-modal transportation by providing pedestrian linkages through the site and bicycle facilities on-site, which would assist in reducing Project-related vehicle trips and VMT. For example, the proposed Project would include publicly accessible ground-level open space traversed with pedestrian pathways which would provide on-site and off-site connectivity with the existing sidewalks adjacent to the Project site on North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The proposed new two-tiered stairway would provide an additional pedestrian entrance to the Project site adjacent to the intersection of Beryl Street & Flagler Lane, and the pedestrian-only open space on the ground level of the proposed Project would enhance active transportation usage in the Project vicinity. Open space areas would include an entry plaza featuring directional signage, public art, seating areas, and water feature, a tree-lined pedestrian promenade, and a relocated demonstration garden, making walking safe, interesting, and enjoyable. Additionally, the proposed Project would provide secure, on-site short-term bicycle parking, a bicycle repair station, and shower and locker facilities for visitors and employees to encourage active transportation to and from the Project site and reduce vehicle trips.

Additionally, by developing a mix of land uses on a single site in Redondo Beach and adjacent to Torrance, the proposed Project would increase accessibility to multiple other destinations including restaurants, grocery stores, commercial, recreational, and residential uses. As a result of increased destination accessibility, the proposed Project would support the City-wide goal of reducing overall vehicle trips and VMT.

As described in Section 3.10, *Land Use and Planning* the proposed Project would be consistent with all applicable goals of the Redondo Beach General Plan Circulation Element.

*Torrance General Plan Circulation and Infrastructure Element and Hawthorne Boulevard Corridor Specific Plan*

The Torrance General Plan Circulation and Infrastructure Element identifies a transportation system capable of responding to growth occurring consistent with the Land Use Element. This element describes physical improvements needed to attain circulation objectives for automobiles, pedestrians, cyclists, and transit riders, and introduces other measures (e.g., restricted street parking, transportation systems management plans) that can be used to improve traffic flow. The Hawthorne Boulevard Corridor Specific Plan provides a framework of detailed standards and guidelines for integrating land use and transportation to reduce vehicle trips; encouraging walking, bicycling, and transit use; and creating active, pedestrian-oriented neighborhoods. The primary goals of the General Plan Circulation and Infrastructure Element and Hawthorne Boulevard Corridor Specific Plan with regard to the circulation system within Torrance are focused on maintaining or improving the existing LOS at intersections during peak periods, protecting residential neighborhoods from cut-through traffic, and reducing the dependence on single-occupant vehicles.

The proposed Project is expected to reduce daily and peak period trip generation during operation of Phase 1 when compared to existing conditions, as detailed under Impact T-2. While operation of Phase 2 of the proposed Project is expected to generate an increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing conditions (refer to Table 3.14-7). Therefore, implementation of the proposed Project would reduce trip generation during peak periods and result in a mildly positive effect on intersection operations along key corridors in Torrance, such as Hawthorne Boulevard.

With implementation of the Construction Traffic and Access Management Plan (MM T-2), the proposed Project would avoid construction traffic through residential neighborhoods within Torrance to the maximum extent feasible (refer to Figure 2-13 for the proposed construction vehicle haul routes). Additionally, the proposed driveways on Flagler Lane south of Beryl Street would be restricted to left turns only, preventing traffic from cutting through the Torrance residential neighborhood to the east of the Project site. Further, service and delivery vehicles would be instructed to enter the driveway from Flagler Lane to the north in order to avoid cut-through traffic within this residential neighborhood (see Impact T-3 for further discussion of Project impacts related to cut-through traffic).

As described in Section 3.10, *Land Use and Planning* the proposed Project would be consistent with all applicable goals of the Torrance General Plan Circulation and Infrastructure Element. As noted above, the proposed Project would also be consistent with the Hawthorne Boulevard Corridor Specific Plan.

*Summary of Consistency Discussion*

As described above, the proposed Project is consistent with all applicable development standards, design guidelines, and other transportation-related strategies. The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be *less than significant*.

Impact Description (T-2)

*b) The project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).*

**T-2 Additional vehicle miles traveled (VMT) generated during construction would be minimized with implementation of a Construction Traffic and Access Management Plan. Long-term operation of the proposed Project would generate an incremental increase in VMT that would be *less than significant*.**

*Construction*

Construction activities associated with development of the proposed Project would result in additional construction VMT in the vicinity of the Project site and on the PCH and I-405 freeways. Construction-related traffic would include haul trucks, cement trucks, equipment delivery trucks, and construction worker vehicles. During excavation, haul trucks would be required for import and export of materials. Construction activities associated with Phase 1 of the proposed Project would generate up to approximately 1,825 haul truck trips for export of demolished asphalt and excavated soil, and 2,000 haul truck trips for export of demolition debris. Additionally, construction of the RCFE Building would require approximately 1,237 truck trips for concrete delivery. Backfill of the Beach Cities Health Center basement would require approximately 875 truck trips for import of clean soil (refer to Section 2.5.1.3, *Construction Activities*). Construction activities associated with the Phase 2 development program would require approximately 1,660 trips associated with export of demolition debris and excavated soil and approximately 2,149 trips associated with concrete and steel deliveries (refer to Section 2.5.2.4, *Construction Activities*).

The majority of excavation and soil export would occur during the construction of the RCFE Building under Phase 1 construction. The timing and frequency of haul truck trips would be dictated by the rate of excavation activities within the proposed parking structure footprint; however, it is estimated that the rate of export would be up to 1,250 haul truck trips over a 1-month period. All construction and demolition (C&D) waste would be exported to a mixed C&D debris recycling facility approved by the City of Redondo Beach pursuant to a Construction & Demolition Waste Management Plan. This phase of construction would also involve vehicles trips and associated VMT to provide construction materials, support excavation, and transport construction workers. Construction worker vehicles, materials deliveries, and other construction-related trips are expected to result in additional haul truck trips on area streets throughout the construction period. Construction-related increases in VMT would be temporary in nature and *less than significant*. Further, the implementation of MM T-2 would reduce this impact by requiring the preparation of a Construction Traffic and Access Management Plan, which would include provisional measures to reduce construction traffic, maintain public safety, and reduce associated VMT.

*Operations*

The VMT screening conducted for the proposed Project determined that operation of the proposed Healthy Living Campus following the completion of Phase 2, would not meet the screening criteria for small project screening or low VMT area screening. Therefore, Fehr & Peers prepared a VMT analysis to determine whether implementation proposed Project would result in a significant increase in VMT.

The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in a net increase of 376 new daily trips (refer to Table 3.14-7). The projected increase in daily vehicle trips under the proposed Project would subsequently result in an increase in daily VMT at the Project site as compared to existing conditions.

As described in Section 3.14.3, *Impact Assessment and Methodology*, the City of Redondo Beach's Draft VMT Guidelines concur with a VMT significance threshold of 16.8 percent below the SBCCOG regional average VMT for home-based work trips and home-based trips. As described in Table 3.14-11, the SCAG Regional Travel Demand Model determined that home-based work VMT generated within the Project TAZ is 14.8 miles, which is 19 percent lower than the SBCCOG regional average of 18.4 miles. Therefore, Project TAZ home-based work VMT does not exceed the threshold of 16.8 percent below the SBCCOG regional average VMT, and impacts related home-based work VMT under the proposed Project are considered to be *less than significant*.

**Table 3.14-11. Project VMT Impact Analysis**

| VMT Metrics | VMT Estimates |
|---|---|
| SBCCOG Average Home-Based Work VMT per Employee | 18.4 |
| Project TAZ Home-Based Work VMT per Employee | 14.8 |
| *Threshold of Significance (16.8% below regional average)* | *15.3* |
| **Above Threshold?** | **No** |
| SBCCOG Average Home-Based VMT per Capita | 13.3 |
| Project TAZ Home-Based VMT per Capita | 12.8 |
| *Threshold of Significance (16.8% below regional average)* | *11.1* |
| **Above Threshold?** | **Yes** |

Source: Fehr & Peers 2021; SCAG 2016.

As described in Section 3.14.3, *Impact Assessment and Methodology*, StreetLight data for the Project site show that existing trip lengths to the Project site are significantly lower than those calculated using the SCAG model. For example, the average home-based VMT generated within the SBCCOG region is 13.3 miles as estimated by the SCAG Regional Travel Demand model (refer to Table 3.14.11), while the average weekday trip length to/from the campus is 6.4 miles as calculated using StreetLight data. StreetLight data relies not on a forecast, but on actual observed behavior. While the proposed Project's Assisted Living program is a residential population, it is likely to generate vehicle trips and VMT at a lower level than typical residential uses contained in the SCAG model forecast.

StreetLight data were evaluated for Brookdale South Bay located in the City of Torrance as an example data source of average trip lengths for Assisted Living residents. Brookdale South Bay provides independent living units the proposed Assisted Living program under Phase 1 of the proposed Project. Based on StreetLight data, the average trip length of Brookdale South Bay residents was 4.8 miles in 2019. This average trip length is less than 50 percent of the home-based VMT per capita calculated for the Project TAZ using the SCAG Regional Travel Demand model. It should be noted that the average trip length of 4.8 miles from Brookdale South Bay includes employee travel; therefore, the average residential trip length is likely even shorter than 4.8 miles. With this additional evidence of shorter average trip lengths associated with independent Assisted Living residents, the home-based VMT per capita for the proposed Project would be less than 11.1 (16.8 percent below the SBCCOG regional average; refer to Table 3.14-11). Because average trip lengths associated with independent Assisted Living residents is shorter than 4.8 miles, Project-related VMT would be below the threshold of significance for home-based VMT per capita. The potential for Project-related impacts to home-based VMT per capita is determined to be *less than significant*.

As demonstrated by the above analysis, while the proposed Project would generate a net increase of 376 daily vehicle trips, the average trip length associated with the campus would be substantially lower than the regional average. Further, the proposed Project would implement several transportation-related sustainability features that are not accounted for in the SCAG Regional Travel Demand Model estimation of home-based VMT. As previously described, the Assisted Living, Memory Care, and PACE services would share and use vans to transport several participants at once, which would reduce vehicle trips and associated VMT to the campus. The proposed Project would also include ride-share amenities as well as an emergency ride home program for employees and visitors in order to encourage active transportation to the campus. BCHD would provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings as well as bicycle facilities, such as bicycle parking, a bicycle repair station, and employee shower and locker facilities. BCHD would also incentivize the use of hybrid and EVs by providing designated parking with free EV charging stations.

While the proposed Project would not generate VMT that would result in a significant transportation impact, MM T-1 is recommended to assist in implementing the TDM plan required for the proposed Project by RBMC Section 10-2.2406. Implementation of the TDM plan would include promotion of alternative transportation modes and carpool incentives for employees, which would further reduce Project-related VMT. The TDM plan would also encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being. The TDM plan would also include transit and carpool incentives for employees, such as subsidized Beach Cities Transit passes and designated parking for vanpools and carpools. See MM T-1 below for a list of measures being considered for the proposed TDM plan.

Recommended Mitigation Measures (MM)

***MM T-1*** ***Transportation Demand Management (TDM) Plan.*** *The Beach Cities Health District (BCHD) would prepare and implement a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors. The TDM plan would be prepared by a qualified transportation engineer/planner and overseen by a TDM Coordinator to be designated by BCHD. The TDM plan would be developed prior to the issuance of a Conditional Use Permit (CUP) for Phase 1 of the proposed Project and would be continuously maintained and adjusted as needed.*

*The BCHD TDM Coordinator would monitor employee, tenant, and visitor mode share with annual surveys and develop annual reports for submittal to the BCHD Board of Directors. The surveys shall capture trip origin data, travel mode, rideshare (e.g., number of people in the party), and other key data and indicators for TDM program performance relative to vehicle miles traveled (VMT) (e.g., employee incentives for bicycling to work). The BCHD TDM Coordinator would ensure that monitoring efforts capture all BCHD-related travel behavior. Annual monitoring reports would include trip length surveys completed at least biannually by a sample of BCHD employees and tenants by BCHD employees (e.g., trip origin data collection). Survey results would be used to determine the appropriate TDM measures to employ in the coming year to maximize reductions in VMT per capita, champion transit and alternative mode transportation to BCHD employees, develop appropriate incentives to increase BCHD's transit mode share incrementally over time, and develop effective marketing tools to advertise transit and non-vehicular travel mode availability and incentives.*

*Each annual TDM Program monitoring report would:*

- *Describe the TDM efforts in place at the time to reduce vehicular trips;*
- *Summarize collected employee and tenant survey data and results;*
- *Evaluate survey data and results, comparing trends and annual changes;*
- *Evaluate change in available transportation infrastructure and programs serving the campus;*
- *Provide recommendations for adjustments to the TDM Program to adaptively manage VMT reductions for employees, tenants, and visitors.*

*The TDM Coordinator would oversee annual monitoring and reporting to evaluate the effectiveness of the TDM measures being implemented at the campus and recommend adjustments as needed to the TDM plan on an annual basis. Final annual reports and data (e.g., survey data) shall be shared with the cities of Redondo Beach and Torrance and made readily available for public review and use. Information regarding the TDM plan shall be distributed to all BCHD employees and tenants and shall be posted on BCHD's website and other marketing materials for BCHD visitors and updated annually as needed based on the annual reports.*

*The TDM Coordinator would consider a range of measures for the TDM plan to reduce employee and visitor VMT per capita, including, but not limited to, the following:*

- *Provide employee incentives to participate in a vanpool program and regularly advertise the opportunities to vanpool through a variety of employee communication formats.*
- *Partner with rideshare companies such as Uber or Lyft to guarantee availability of an emergency ride home or provide access to ~~City~~BCHD vehicles for this purpose.*
- *Offer employee TDM benefits for use of active transportation commuter modes, including ridesharing, transit, bicycling, walking, carpool/vanpool, etc. Incentives for BCHD employees could include flexible scheduling or options for telecommuting.*
- *Maximize opportunities for BCHD employees to telecommute as part of regular scheduling.*
- *Provide a transportation information center and wayfinding signage for nearby Beach Cities Transit Line 102 bus stops.*
- *Expand the proposed onsite bicycle facilities (i.e., shower, racks, and lockers) for BCHD employees in an amount and location informed by annual employee surveys and monitoring reports.*
- *Encourage bicycles as a primary commute mode for employees and provide incentives for biking to work, including providing free or discounted equipment to employees such as helmets, locks, bicycle commuter gear, and bicycles (electric or non-electric).*
- *Coordinate with the cities of Redondo Beach and Torrance to identify and facilitate new bicycle paths between the BCHD campus and neighboring communities, particularly linkages to existing bicycle path segments. BCHD and the cities of Redondo Beach and Torrance shall ensure that all bicycle paths to the campus are well-signed, provide lighting, and are regularly patrolled by law enforcement.*
- *Provide commuter clubs for employees and campus visitors to support a collaborative approach to TDM.*
- *Maintain and expand onsite bicycle parking for BCHD visitors in an amount and location informed by visitor surveys and annual monitoring reports.*
    - *Maintain and expand short-term bicycle parking within the BCHD campus to meet changing demands evaluated in the TDM Program annual reports.*
    - *Provide well-lit, clearly signed, bicycle parking that is convenient and in close proximity to the Entry Plaza to encourage bicycling by visitors.*

- *Provide secure short-term bicycle parking and/or a bicycle parking attendant, bicycle valet, or indoor bicycle parking facility to prevent theft and ensure parking availability for BCHD visitors.*
- *Design bicycle racks with space-efficient configurations, such as vertically staggered racks and two-tier racks.*
- *Provide a bicycle station at the campus as a part of the Metro Bike Share or a new bike share program specific to BCHD. Funding shall be determined based on the area required for the bicycle station. The bicycle share station shall be well-lit and located at a safe and convenient location adjacent to the Entry Plaza.*

Residual Impacts

Although not required to mitigate a significant VMT impact, implementation of recommended MM T-1 would further reduce *less than significant* impacts related to VMT.

Impact Description (T-3)

c) *The project would substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*

**T-3** **Construction traffic hazards would be mitigated by implementation of a Construction Traffic and Access Management Plan. Operation of the proposed Project may increase hazards for pedestrians and transit along eastbound Beryl Street due to the proposed new driveway entrance at the Flagler Lot. Construction and operational impacts related to hazards due to design features would be *less than significant with mitigation*.**

*Construction*

Construction traffic would include haul trucks, cement trucks, equipment delivery trucks, and construction worker vehicles. Demolition would require the use of typical construction equipment, such as backhoes, to break up and remove existing asphalt, concrete, and building materials. Heavy equipment, such as bulldozers and excavators, and haul trucks would be used to haul away large amounts of debris to a mixed C&D debris recycling facility approved by the City of Redondo Beach pursuant to a Construction & Demolition Waste Management Plan. During excavation, haul trucks would be needed for import and export of materials. The majority of excavation and soil export would occur during the construction of the subterranean service area and loading dock included in the Phase 1 preliminary site development plan. The timing and frequency of haul trucks would be dictated by the rate of excavation activities within the proposed parking structure footprint; it is estimated that the rate of export would be 1,250 haul truck trips within a 1-month

period. This phase would also involve delivery trucks trips, construction worker vehicle trips, and other construction-related trips that would result in additional trips per day on the surrounding street network and PCH and I-405 freeways throughout the construction period. However, construction-related increases in traffic would be temporary in nature.

Increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. For example, construction activities associated with the proposed Project may require the temporary or extended closure of adjacent traffic lanes and sidewalks on surrounding streets (i.e., North Prospect Avenue and Beryl Street) to accommodate excavation for utilities, operation of construction equipment, etc. All construction equipment would be staged within secured construction areas within or adjacent to the campus. The primary construction staging areas for equipment and materials would be the vacant Flagler Lot and the existing northern surface parking lot (refer to Figure 2-12). Nevertheless, frequent haul truck traffic entering and exiting the driveways along North Prospect Avenue and Beryl Street could interfere with pedestrian and bicycle flows along both streets. Other potential construction-related impacts include idling, parked, or queued haul trucks that could potentially obstruct visibility. Haul trucks would exit the I-405 freeway on 190$^{th}$ Street or Hawthorne Avenue to 190$^{th}$ Street and reach the site using Del Amo Street to North Prospect Avenue (refer to Figure 2-13; Section 2.5.1.6, *Construction Activities*).

As a result, construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity would be potentially significant. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the L.A. County – Department of Transportation Area Traffic Control Handbooks. The Construction Traffic and Access

Management Plan would address temporary traffic impacts that could occur during each construction activity. With the implementation of MM T-2, construction-related hazards would be reduced to *less than significant with mitigation*.

Specific construction areas within the campus would be temporarily fenced with 8-foot-high construction fencing and blocked off to employees and campus visitors during construction activities. Larger closures of the campus would be required during the demolition of the Beach Cities Health Center during Phase 1 and during the demolition of the parking structure and potentially the Beach Cities Advanced Imagining Building during Phase 2. All construction equipment would be staged within the secured construction fencing. Additionally, signage would be posted with maps clearly describing pedestrian and vehicle detours on campus. Signage would also clearly show convey warning information and safety regulations (e.g., no trespassing, hard-hats required, etc.) to deter pedestrians from entering the active construction areas. With the implementation of MM T-2, construction-related hazards would be reduced to *less than significant with mitigation*.

*Cut-Through Traffic*

As described in Section 3.14.1, *Environmental Setting*, cut-through traffic could present a safety hazard associated with speeding through residential neighborhoods and the increased risk of collisions. Cut-through traffic is a major concern for the residents of the Torrance neighborhood and was identified as an area of public concern within the agency and public comment letters received on the Notice of Preparation (NOP) for this EIR (refer to Section 1.8, *Areas of Known Public Controversy*). To reduce cut-through traffic and associated safety risks between Beryl Street and Del Amo Boulevard, Torrance is currently planning to pilot a temporary one-way partial closure of southbound traffic on Flagler Lane between Towers Street and Beryl Street. In preparation for the pilot, the City of Torrance conducted license plate surveys during the AM and PM peak periods at four locations on the boundary of the neighborhood (refer to Section 3.14.1, *Environmental Setting*; refer to Table 3.14-3 for further information regarding the results of the license plate surveys).

In addition to the City of Torrance's license plate surveys to evaluate cut-through traffic between Beryl Street and Del Amo Boulevard, Fehr & Peers collected neighborhood street segment counts on a number of roadways in the Torrance neighborhood to the east of the campus. The streets considered in these counts include, but are not limited to, Flagler Lane between Beryl Street and Towers Street, and Redbeam Avenue between Norton Avenue and Del Amo Boulevard. The counts showed 1,350 daily vehicles entering the neighborhood from the north end via Flagler Lane

at Beryl Street, and 1,110 daily vehicles exiting on the south end of the neighborhood on Redbeam Avenue at Del Amo Boulevard. In the opposite direction, the counts showed 1,240 daily vehicles entering the neighborhood from the south end on Redbeam Avenue at Del Amo Boulevard, and 1,358 daily vehicles exiting the neighborhood on the north end on Flagler Lane at Beryl Street.

Most cut-through traffic occurs when congestion is high on arterial streets, particularly during commute AM and PM peak periods. Assuming cut-through traffic remained constant throughout the midday period (i.e., between 9:30 a.m. and 4:00 p.m.), a total of 73 vehicles heading southbound on Flagler Lane from Beryl Street could be expected to cut-through the neighborhood during the midday period, for an average of 11 cut-through vehicles per hour. During the nighttime period (i.e., between 6:00 p.m. and 7:30 a.m.), a total of 38 cut-through vehicles could be expected to cut-through the neighborhood in the southbound direction, for an average of 3 cut-through vehicles per hour. However, cut-through traffic typically occurs most often during peak commute periods when drivers may attempt to bypass congested locations; therefore, midday cut-through traffic would likely be lower than the AM and PM peak period percentages identified by the City of Torrance.

As previously described, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by taking a right off of Flagler Lane and exit taking a left turn onto northbound Flagler Lane (refer to Figure 2-8). Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to long-term parking on the campus and as such, would not be a primary entrance. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood.

Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation, the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods. Therefore, the proposed Project would not contribute to operational safety hazards related to cut-through traffic, and impacts would be *less than significant*.

*Project Site Access*

The design of each Project phase would be required to undergo review by City of Redondo Beach and City of Torrance (where applicable) decision-makers, including a review of roadway improvements and operations so that vehicle, bicycle, and pedestrian access are adequately accommodated without obstructing, hindering, or impairing drivers' reasonable and safe views of other vehicles, people walking, or people bicycling on the same street and/or restricting the ability of a driver to stop a motor vehicle without danger of an ensuing collision. Design features of individual development projects would need to be consistent with State design standards, such as the California MUTCD, as well as City of Redondo Beach and City of Torrance (where applicable) standards, which focus on eliminating existing hazards and designing the transportation network so as to enhance safety of all ways of travel.

The proposed Project would include additional entrances to the Project site and reconfigure the internal circulatory system. As discussed in Section 3.14.1, *Environmental Setting*, access to the campus is currently available directly from three driveways along North Prospect Avenue. Additionally, the vacant Flagler Lot is accessible via a curb cut along eastbound Beryl Street. Under the proposed Project, the Project site would remain accessible from the three existing driveways along North Prospect Avenue. In addition, Flagler Lot would be developed with a new one-way driveway accessible via a right-turn along eastbound Beryl Street, which would support a pick-up/drop-off zone for the proposed RCFE Building. A service entrance to the RCFE Building would be provided off of Flagler Lane, approximately 150 feet south of Beryl Street. Pedestrian and bicyclist access to the Project site would be preserved at the three existing driveways along North Prospect Avenue. Additionally, a new pedestrian access point would be provided at the southwest corner Beryl Street and Flagler Lane via the tiered staircase leading into the interior portion of the main campus.

As described in Section 3.14.1, *Environmental Setting*, an existing bus stop for the northbound Beach Cities Transit Line 102 is located along eastbound Beryl Street to the north of the Redondo Village Shopping Center parking lot and adjacent to the northwest corner of Flagler lot. The proposed one-way driveway along eastbound Beryl Street would be located adjacent to and east of the existing Beach Cities Transit bus stop. While there is an existing curb cut and driveway into the vacant Flagler Lot, the lot is currently closed off with a gate and does not permit vehicle entry. Implementation of the proposed Project would generate an increase in vehicle entry into Flagler Lot via the proposed one-way driveway and pick-up/drop-off zone for the patrons of the RCFE Building and other visitors to the campus. The proposed Project could result in an increase in vehicle-bus conflicts associated with stopped buses at the Beach Cities Transit stop and vehicles

turning right into the proposed one-way driveway. Implementation of MM T-3 would require the existing Beach Cities Transit Line 102 bus stop to be relocated to the east of the proposed one-way driveway entrance along Beryl Street to avoid the potential for safety hazards associated with transit. With implementation of the bus stop relocation, impacts to safety hazards related to vehicle-bus conflicts would be reduced to *less than significant with mitigation*.

*The existing Beach Cities Transit Line 102 bus stop located adjacent to the west of Flagler Lot on eastbound Beryl Street would be relocated to the east of the proposed one-way driveway.*

Vehicles accessing the Project site via Beryl Street could also block, delay, or increase traffic hazards associated with existing pedestrian and bicyclist traffic along the south side of Beryl Street. However, the proposed one-way driveway would be designed in accordance with applicable RBMC standards and sight distances would be approved by the Redondo Beach Community Development Department during site plan approval. The proposed one-way driveway would allow for right-turn in only from Beryl Street and would provide access for a very limited portion of the proposed Project's visitors (i.e., primarily visitors to the RCFE Building).

Vehicle traffic from the proposed one-way driveway and service entrance along Flagler Lane would not contribute to pedestrian safety hazards given that there is no sidewalk along the west side of Flagler Lane south of its intersection with Beryl Street. The service area and loading dock entrance would be stop-controlled and would be limited to right-turn in and left-turn out movements. Further, the service access entrance would be limited to service vehicles and delivery vehicles only and would not be used by staff, residents, participants, or other visitors to the campus. Consequently, vehicle traffic associated with the proposed driveways along Flagler Lane would not interfere with pedestrian, bicycles, or vehicles.

Given that existing site access is currently limited to the three driveways along North Prospect Avenue, the additional proposed access point off of Beryl Street would better distribute Project-related vehicle traffic around the site, and reduce the potential for vehicle-pedestrian and vehicle-bicyclist interactions on North Prospect Avenue as compared to existing conditions. Additionally, implementation of the proposed Project is projected to significantly reduce total trip generation

during Phase 1, including a reduction during the peak period of traffic when conditions are most stressful for pedestrians and bicyclists. While operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips to the surrounding roadways, this general increase in vehicle traffic volumes would be distributed among multiple streets in the vicinity and would not be considered to substantially increase traffic hazards. Further, the AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing conditions (refer to Table 3.14-7). Therefore, implementation of the proposed Project would result in a minor reduction in safety hazards related to vehicle congestion during the AM and PM peak periods.

The proposed new driveways would be engineered to comply with State, County, and local standards and designed to intersect the roadway at a right angle to address line of sight, turning radii, spacing, etc. to avoid potential conflicts with transit services, bicycles, and pedestrian traffic. The one-way driveway entrance would also provide the necessary crosswalk and pedestrian movement controls to meet the State, County, and local requirements to protect vehicle, bicycle, and pedestrian safety. The one-way driveway would also be designed to accommodate mobility services for TNCs (e.g., Uber, Lyft, etc.). The existing Class II bicycle lane would be maintained on Beryl Street east of Flagler Lane following the driveway realignments along eastbound Beryl Street. The final design plans of the proposed new driveways along Beryl Street and Flagler Lane would be subject to review by the Redondo Beach Engineering Division and Torrance Community Development Department~~s~~. Thus, with compliance with local standards and regulations and review and approval by various local agencies, the proposed Project would not create potentially hazardous conditions for people driving, and impacts related to driving hazards would be *less than significant with mitigation*.

*Internal Campus Circulation*

Proposed internal circulation changes would improve vehicle and pedestrian mobility and safety by simplifying travel through the campus. Vehicular circulation through the Project site would be limited to the southwestern portion of the campus. The existing surface parking lot on-site is located along the northern perimeter of the campus, requiring vehicles to drive through or around the main campus to reach the parking area. During Phase 1 of the proposed Project, the central driveway would lead vehicles directly to the proposed surface parking lot, and would continue to provide access to the existing parking structure at 512 North Prospect Avenue as well as the surface parking lot and subterranean parking garage west of the Providence Little Company of Mary Medical Institute Building. The southern driveway would also continue to lead directly to the existing above ground parking structure. The vehicle driveway and pick-up/drop-off zone at the

western side of the RCFE Building would improve vehicle circulation and would allow vehicles to directly exit the Project site via the northern driveway onto North Prospect Avenue. Therefore, implementation of the Phase 1 preliminary site development plan would promote efficient vehicular circulation on campus. Implementation of the Phase 2 development program would similarly develop an efficient circulation system on-site. Under the Example A site plan scenario, the southern driveway would provide direct access to the proposed new parking garage and the central driveway would lead to the existing western surface parking lot and subterranean garage as well as to the vehicle driveway and pick-up/drop-off zone at the western side of the RCFE Building. Under the Example B and C site plan scenarios, all three driveways along North Prospect Avenue would connect to the main access road on-site, which would provide access to the proposed automated parking structure, the existing western surface parking lot and subterranean garage, and the vehicle driveway and pick-up/drop-off zone at the western side of the RCFE Building.

The interior of the campus would provide a series of pedestrian pathways ranging from 10 to 26 feet wide, with direct public access to all of the proposed buildings on the campus. The proposed Main Street promenade would extend from the entry plaza around the perimeter of the central lawn to the eastern border of the campus to provide a complete and intuitive circulation loop for visitors to enjoy proposed green space and landscaping. The pedestrian promenade would also be lined with benches shaded by tree canopies to promote walking through the campus. The on-site pedestrian improvements would also be graded at no more than 5 percent slope to provide more ADA-accessible and pedestrian-friendly navigation for BCHD employees, tenants, and campus visitors. This pedestrian-only open space would be closed off to vehicles to improve visitor safety and mobility through the campus. Pedestrian mobility and safety would be considered in the design of other internal circulation improvements such as the vehicle driveway and pick-up/drop-off zone at the western side of the RCFE Building.

Proposed Project improvements to internal circulation within the campus would result in minor beneficial and *less than significant* operational impacts to transportation safety hazards.

<u>Mitigation Measures</u>

***MM T-2*** ***Construction Traffic and Access Management Plan*** *Following preparation of the final design plan for Phase 1 of the proposed Project, the Beach Cities Health District (BCHD) shall expand upon the Construction Traffic Control Plan and prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic*

*and Access Management Plan shall be subject to review and approval by ~~BCHD,~~ the California Department of Transportation (Caltrans), County Department of Transportation (DOT). ~~and~~ Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department prior to issuance of a Conditional Use Permit (CUP). The Construction Traffic and Access Management Plan shall be designed to:*

- *Prevent traffic impacts on the surrounding roadway network;*
- *Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable;*
- *Ensure safety for construction workers and the surrounding community; and*
- *Prevent substantial truck traffic through residential neighborhoods.*

*The Plan shall, at a minimum, include the following:*

- *Designated haul routes consistent with the Redondo Beach and Torrance General Plan designations;*
- *On-site staging areas, which would avoid residential streets to the maximum extent feasible;*
- *Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction flaggers at the three driveways along North Prospect Avenue as well as the proposed driveways along Beryl Street and Flagler Lane) to address circulation requirements and public safety in accordance with the standards in the County DOT Area Traffic Control Handbooks;*
- *Emergency access provisions (i.e., North Prospect Avenue and Beryl Street); ~~and~~*
- *~~Construction crew parking.~~On-site construction crew parking to the maximum extent feasible; and*
- *Prohibition of crew parking in adjacent residential neighborhoods.*

*Ongoing Requirements throughout the duration of construction:*

- *A detailed Construction Traffic Control Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. Such plans shall be reviewed and approved by the Redondo Beach Community Development Department, Redondo Beach Public Works Department, and Torrance Community Development Department prior to issuance of a demolition, excavation, grading, or building permit and implemented in accordance with this approval.*
- *Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m. This work includes dirt and demolition material hauling and*

*construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed contingent upon the issuance of an after-hours construction permit from the Redondo Beach Public Works Department Engineering Division and Torrance Community Development Department.*

- *Streets and equipment shall be cleaned in accordance with established Redondo Beach and Torrance Public Works Department requirements.*
- *Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself.*
- *Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current City of Redondo Beach permit.*

*Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction*

- *Prior to implementation of Phase 1 and Phase 2 of the proposed Project, BCHD shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, and media listing/notification) as well as provide a call line for complaints and concerns regarding construction traffic.*
- *BCHD shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, Redondo Beach Fire Department [RBFD], Redondo Beach Police Department [RBPD], Torrance Fire Department [TFD], Torrance Police Department [TPD], Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet prior to the implementation of Phase 1 and Phase 2 of the proposed Project.*
- *BCHD shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks or longer per each submittal.*
- *BCHD shall obtain approval from the cities of Redondo Beach and Torrance of any haul routes for earth, concrete, or construction materials and equipment hauling.*
- *BCHD shall obtain an Excavation Permit, Street/Lane Closure Permit, Sewer Permit, Demolition Permit, and any other applicable permits for construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way.*

***MM T-3*** ***Relocation of Beach Cities Transit Line 102.*** *To implement the proposed one-way driveway and pick-up/drop-off zone on Flagler Lot, the Beach Cities Health District (BCHD) shall work with the Redondo Beach Community Services Department Transit Division to relocate the existing Beach Cities Transit Line 102*

*northbound bus stop along eastbound Beryl Street. The bus stop shall be located along the south side of Beryl Street between the proposed one-way driveway entrance to the west and the intersection with Flagler Lane to the east. All proposed transit stop improvements shall be incorporated into final plans and reviewed and approved by the Redondo Beach Community Services Department Transit Division prior to the issuance of permits for these improvements.*

Residual Impacts

Implementation of mitigation measure MM T-2 would reduce impacts related to construction traffic hazards to *less than significant*. Implementation of mitigation measure MM T-3 would reduce operational impacts associated with sight distance and vehicle-bus conflicts at the proposed one-way driveway along Beryl Street to *less than significant*.

Impact Description (T-4)

*d) The project would result in inadequate emergency access.*

**T-4** **Emergency access to the Project site is currently adequate and would be maintained following the construction of the proposed Project. During construction, emergency access could be impeded due to haul truck traffic, temporary lane closures, or other construction activities. However, with implementation of a Construction Traffic and Access Management Plan, impacts of construction on emergency access would be *less than significant with mitigation*.**

*Construction*

During construction, short-term impacts on emergency access to the Project site would be potentially significant due to the presence of perimeter construction fencing, heavy construction equipment, construction workers, and large excavations and/or trenches. To ensure emergency access is maintained during Project construction, MM T-2 would require a Construction Traffic and Access Management Plan to ensure that an alternate entrance and secondary access is available and clearly indicated and that emergency responders could proceed directly to the most efficient entrance without undue delay or confusion. The Construction Traffic and Access Management Plan would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking. The Construction Traffic and Access Management Plan would also establish procedures for coordination with local emergency services (i.e., RBFD, ~~and~~ RBPD, TFD, TPD), training for flaggers for emergency vehicles traveling through the work zone,

and other measures as necessary to facilitate emergency vehicle travel. Thus, the Construction Traffic and Access Management Plan would ensure the continued provision of emergency access during construction of the proposed Project. Implementation of MM T-2 would ensure that construction impacts on emergency access would be *less than significant with mitigation*.

*Operational*

SR-1 and SR-107, located approximately 0.5 miles west and 1.5 miles east of the Project site, respectively, are designated Primary Disaster Routes by the County of Los Angeles. In addition, the City of Redondo Beach has an adopted emergency evacuation routes for a tsunami, which include North Prospect Avenue, Beryl Street, and 190th Street. The City of Torrance has not designated emergency routes. The proposed Project does not propose changes in, obstructions to, or reconfigurations of public evacuation routes (refer to Section 3.8, *Hazards and Hazardous Materials*).

The proposed Project would include additional entrances to the Project site and improve the internal circulatory system, which would improve direct emergency access to the proposed campus buildings. As discussed in Section 3.14.1, *Environmental Setting*, emergency access to the campus is currently available directly from three driveways along North Prospect Avenue. Additionally, the vacant Flagler Lot is accessible via eastbound Beryl Street.

Under the proposed Project, the Project site would remain accessible from the three existing driveways along North Prospect Avenue. In addition, Flagler Lot would be developed with a one-way driveway and passenger drop-off zone, which would provide direct access to the proposed RCFE Building. This building would also be accessible to service, delivery, and emergency vehicles (e.g., fire trucks, ambulances, etc.) via an entrance to the subterranean service area off of Flagler Lane, approximately 150 feet south of Beryl Street.

Within the interior of the campus, the existing perimeter road would be removed and replaced with a pedestrian promenade (Main Street) that would wrap around the campus in a U-shape from the southern driveway to the Providence Little Company of Mary Medical Institute Building. However, emergency vehicle access would be maintained as the pedestrian promenade would be closed to vehicular access with removable bollards for emergency vehicles (refer to Figure 2-8). The pedestrian promenade would connect the existing southern and northern driveways and would provide direct access to the southern side of the RCFE Building. The 26-foot-wide drive aisle would provide sufficient space for Class WB-50 trucks (i.e., 5 axles; 55 feet in length) as well as emergency vehicles. The backyard garden lounge along the northern border of the RCFE Building would provide a secondary emergency access road to the RCFE Building, which would be closed

to all other vehicles. Therefore, emergency vehicle access would be improved under the proposed Project.

An Emergency Plan for the campus would be prepared in coordination with RBFD and RBPD prior to Project operation. Additionally, BCHD would utilize training procedures and an operational handbook that provides processes and procedures for BCHD staff to provide the first responder services. Emergency Plan approval from the RBFD and RBPD would ensure that proposed Project provides sufficient access for emergency vehicles prior to issuance of a building permit. Therefore, emergency access would be maintained following construction of the proposed Project and impacts would be *less than significant*.

Cumulative Impacts

*Consistency with Circulation Plans, Ordinances, and Policies*

The proposed Project would include mixed-use development proximate to the Beach Cities Transit Line 102, bicycle and pedestrian improvements, and the implementation of a TDM plan, all of which would encourage the use of alternative transportation. Although trip generation under the proposed Project would result in 376 net new daily vehicle trips, the average trip length associated with the campus would remain much lower than the regional average, and the proposed Project would be consistent with goals, policies, and regulations related to VMT and GHG reduction in Connect SoCal, Metro's 2020 LRTP, the South Bay Bicycle Master Plan, AB32, SB 32, SB 375, and recommendations of the State Attorney General, OPR and Climate Action Team. Further, several bicycle lane additions and extensions are under design or approved within the cities of Redondo Beach, Torrance, and Hermosa Beach. In particular, BCHD is coordinating the BCHD Bike Path Project (separate from the proposed Project) with the City of Redondo Beach and the City of Torrance to develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street. The expansion of the regional bikeway network in the cities of Redondo Beach, Torrance, and Hermosa Beach would achieve the overall goal of the South Bay Bicycle Master Plan and would align with BCHD's mission to promote health and well-being. As such, the proposed Project would not result in a substantial contribution to cumulatively considerable impacts related to transportation plans and policies.

*Conflict with CEQA Guidelines Section 15064.3, Subdivision (b)*

As discussed under OPR's Technical Advisory, *"metrics such as VMT per capita or VMT per employee, (i.e., metrics framed in terms of efficiency as recommended below for use on residential*

*and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less than significant project impact would imply a less than significant cumulative impact, and vice versa."*

The Project TAZ is in a low VMT area for home-based work VMT, and the home-based VMT in the Project TAZ is approximately 5 percent lower than the average home-based VMT in the SBCCOG region. Additionally, a majority of the cumulative projects listed in Tables 3.0-2, 3.0-3, and 3.0-4 consist of public infrastructure improvements, such as roadway and utility projects, and small (2- to 5-unit) residential projects, which do not generate substantial vehicle trips and VMT. Further, several bicycle lane additions and extensions are under design or approved within the cities of Redondo Beach and Hermosa Beach. BCHD is coordinating the BCHD Bike Path Project (separate from the proposed Project) with the City of Redondo Beach and the City Torrance to develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street. The Bike Path Project would also develop sidewalks along the west side of Diamond Street north of Prospect Avenue and the west side of Flagler Lane south of Beryl Street, where there are currently no sidewalks. The Class I bicycle path and new sidewalks adjacent to the campus, in conjunction with the TDM plan included in the proposed Project, would further promote active transportation in the Project vicinity as well as throughout the South Bay region. Therefore, implementation of the proposed Project *would not result in a substantial contribution to cumulatively considerable impacts* related to VMT.

*Hazards Due to Design Features and Emergency Access*

During construction, emergency access could be impeded as a result of the construction traffic particularly haul trucks and other construction equipment (e.g., cement trucks and cranes), that may disrupt traffic flows, limit turn lane capacities, and generally slow traffic movement. However, with the implementation of MM T-2, construction impacts related to emergency access would be reduced to *less than significant*. Potential overlap of construction activities in Redondo Beach and Torrance could potentially result in a significant increase in daily construction vehicle trips within the vicinity. As with the proposed Project, cumulative projects that have discretionary approval would be required to implement a Construction Traffic Control Plan. These plans, which would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking in the area, would be reviewed by the city with jurisdiction over the proposed project site with an understanding of the other cumulative projects

undergoing construction in the vicinity simultaneously. Thus, implementation of the City-approved Construction Traffic Control Plan for cumulative projects would ensure the continued provision of emergency access. With the implementation of MM T-2, the proposed Project *would not result in a substantial contribution to cumulatively considerable impacts* related to emergency access.

With regard to operation, hazards due to design features and emergency access are generally specific to the Project site, and the proposed Project and associated impacts are generally not additive to other projects. Implementation of the proposed Project would not preclude the City of Torrance converting Flagler Lane to one-way northbound if the closure becomes permanent. Additionally, given that development of the proposed Project would reduce peak period trip generation compared to existing BCHD trip generation, there would be less overall congestion on major roadways in the area during busy commute times, allowing for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods. Therefore, the proposed Project would not contribute to a cumulatively considerable impact to safety hazards related to cut-through traffic. If the City of Torrance's temporary one-way closure of southbound traffic on Flagler Lane is successful and neighborhood residents support it, the one-way closure could become permanent. This would preclude access for service and delivery vehicles to the subterranean proposed service area and loading dock beneath the RCFE Building. Therefore, service and delivery vehicles would be required to drive through the Torrance neighborhood to travel north on Flagler Lane and turn left into the service area and loading dock entrance. Thus, the permanent closure of southbound traffic on Flagler Lane south of Beryl Street would require service and delivery vehicles to cut-through the Torrance neighborhood and would present a potential conflict associated with cut-through traffic. For this reason, an alternative to the proposed Project with a revised access and circulation scheme is considered under Alternatives 3, 4, 5, and 6 in Section 5.0, *Alternatives*.

Additionally, implementation of the Class II bicycle lane along Flagler Alley and segments of Flagler Lane and Diamond Street would be designed with consideration of the proposed Project design features to protect pedestrians and bicyclists along the Class II bicycle lanes as they cross Towers Street. Further, as with the proposed Project, each of the cumulative projects would be subject to site plan review and would meet local street design and access requirements. Therefore, implementation of the proposed Project *would not result in a substantial contribution to cumulatively considerable impacts* related to design features and inadequate emergency access.

## 3.15 UTILITIES AND SERVICE SYSTEMS

This section of the Environmental Impact Report (EIR) describes the existing utility infrastructure and capacity in the vicinity of the Beach Cities Health District (BCHD) campus within the City of Redondo Beach and the City of Torrance. Further, this section of the EIR describes the planned utility infrastructure improvements and evaluates the operation and capacity of these utilities with the development of the proposed BCHD Health Living Campus Master Plan (Project). The utilities analysis is divided into three subsections: 1) water infrastructure and supply; 2) wastewater collection, conveyance, and treatment; and 3) solid waste management. Energy services – including electricity and natural gas – are addressed in Section 3.5, *Energy*.

The Project site is currently served by the following utilities:

**Table 3.15-1. Utilities Serving the Existing BCHD Campus**

| Utility | Service Provider |
|---|---|
| Water | West Basin Municipal Water District, California Water Service Company |
| Wastewater | Los Angeles County Sanitation Districts, City of Redondo Beach Department of Public Works |
| Solid Waste | Athens Services |

### 3.15.1 Water Infrastructure and Supply

This subsection describes the current status of potable water (i.e., drinking water) in the City, including a discussion of local water conservation initiatives and the ability of the local water infrastructure and supply to meet existing demand at the BCHD campus and projected water demands with the implementation of the proposed Project.

#### 3.15.1.1 Environmental Setting – Water Infrastructure and Supply

<u>Water Infrastructure</u>

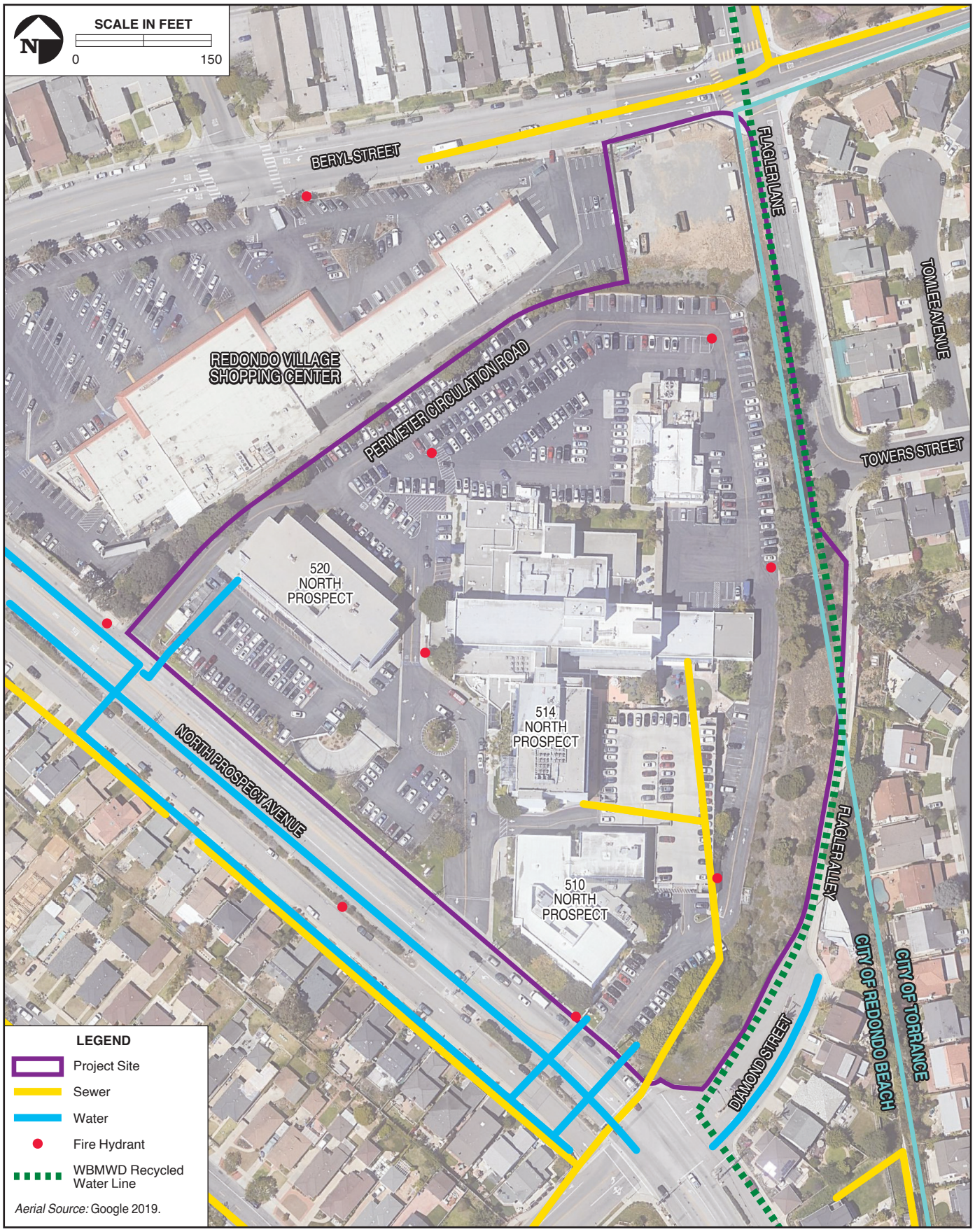
California Water Service Company (Cal Water) is a retail water agency that provides potable and non-potable water throughout California for single- and multi-family residential, commercial, and industrial uses, as well as landscaping irrigation and fire protection. The Project site is located within the Hermosa-Redondo District service area, which includes the Hermosa Beach, Redondo Beach, and portions (i.e., approximately 5 percent) of Torrance (Cal Water 2020). The Hermosa-Redondo District water system includes approximately 212 miles of pipeline, 17 storage tanks, four Metropolitan Water District of Southern California (MWD) connections, and well-head

treatment facilities at two active wells, which remove iron and manganese from groundwater (Cal Water 2020).

Water service to the campus is currently provided through an existing 8-inch water line located along North Prospect Avenue. The 8-inch water main line North Prospect Avenue has two domestic water tie-ins and two fire service tie-ins to the Project site. A 6-inch domestic water tie-in located towards the northwest corner of the Project site provides the connection to the Providence Little Company of Mary Medical Institute Building (i.e., 520 North Prospect Avenue) and an 8-inch domestic water tie-in located at the southwest corner of the Project site provides the connection to the Beach Cities Advanced Imaging Building (i.e., 510 North Prospect Avenue) as well as the Beach Cities Health Center (i.e., 514 North Prospect Avenue). The existing 8-inch water main along North Prospect Avenue can discharge 2,513 gallons per minute (gpm) while keeping a residual pressure of 20 pounds per square inch (psi) in the water main (John Labib & Associates 2020a).

Similarly, two 8-inch fire service tie-ins are located at the northwest boundary of the Project site, north of the surface parking lot, and southwest corner of the Project site. There are currently ~~seven~~ eight fire hydrants located on or adjacent to the campus, two of which are located within the northern surface parking lot, one on the west side and the other on the east side, south of the vacant Flagler Lot. A third fire hydrant is located adjacent to the west end of the Beach Cities Health Center. A fourth fire hydrant is located adjacent to the parking spaces along the eastern end of the Project site Another fire hydrant is located immediately east of the aboveground parking structure. The remaining three fire hydrants are located along North Prospect Avenue, including one adjacent to the southern driveway, one in the raised west-side median near the central driveway, and one adjacent to the northern driveway (see Figure 3.15-1). One additional fire hydrant is located on the southern sidewalk of Beryl Street approximately 500 feet west of the vacant Flagler Lot.

*There are ~~four~~ five fire hydrants located on the campus, including one at the western side of the Beach Cities Health Center. An additional three hydrants are located adjacent to the site along North Prospect Avenue.*




wood.

**Existing Utilities at the Project Site**

**FIGURE 3.15-1**

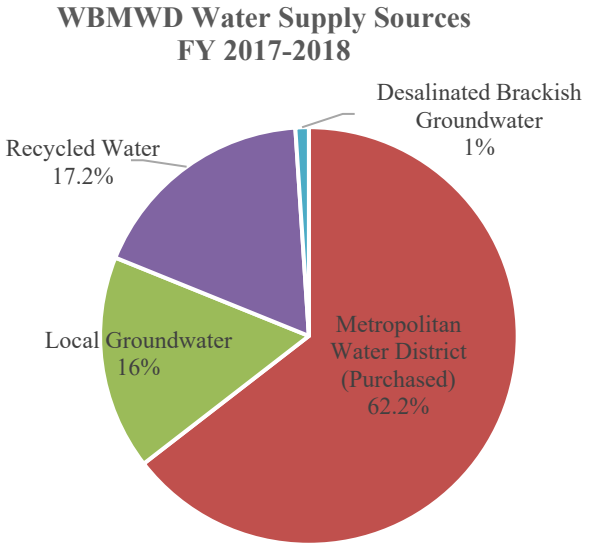
*Fire Flows*

A fire flow test was conducted for the Project site by John Labib & Associates in December 2019. The fire hydrant located adjacent to the north of the southern driveway and immediately west of the Beach Cities Advanced Imaging Building was used as a representative fire hydrant for the Project site. The fire flow test determined that this fire hydrant can discharge 2,513 gpm while keeping a residual pressure of 20 psi (John Labib & Associates 2020a; see Appendix L). This existing water flow and pressure is adequate to serve the proposed Project (John Labib & Associates 2020a; see Appendix L).

- **FIRE FLOW:** Flow rate of a water supply, measured at 20 psi residual pressure, that is available for firefighting (Appendix B of the 2016 California Fire Code). Fire flow is used to determine the quality of a water supply to an area. It also used as an aid to determine pipe size and arrangements to delivery water to a specific area.

Water Supply

Cal Water is responsible for providing water within the Hermosa-Redondo District service area and ensuring that the water quality meets applicable California health standards for drinking water. Cal Water's potable water supply consists of local groundwater and imported water from the West Basin Municipal Water District (WBMWD), a member agency of MWD (through both the State Water Project [SWP] and the Colorado River Aqueduct). Additionally, non-potable treated urban runoff water is produced by WBMWD's Edward C. Little's (ECL) Water Recycling Facility for landscaping irrigation and other approved non-potable water uses. Cal Water's water supply portfolio consists of imported water from MWD connections (80 to 85 percent) and local supplies, including local groundwater basins (15 to 20 percent) and recycled water from the ECL Water Recycling Facility (1 percent).




The WBMWD serves a total of 17 cities throughout southwest Los Angeles County across a service area of 185 square miles. WBMWD purchases imported drinking water from MWD and delivers those drinking water supplies throughout its service area, including the Cal Water service areas (WBMWD 2020a). In Fiscal Year (FY) 2017-2018, WBMWD water supplies totaled 171,386 acre-feet (AF) from several sources, including 50 AF of desalinated brackish groundwater (<1 percent), 106,601 AF of

purchased imported water from MWD (62.2 percent), 27,474 AF of groundwater (16 percent), and 29,522 AF of recycled water (17.2 percent) (see Table 3.15-2; WBMWD 2019).[1]

**Table 3.15-2. WBMWD Water Supply from FY 2014-2015 to FY 2017-2018 (AF)**

| Water Supply Source | FY 2014-2015 | FY 2015-2016 | FY 2016-2017 | FY 2017-2018 |
|---|---|---|---|---|
| Desalinated Water | 690 | 779 | 284 | 50 |
| Imported Water | 105,539 | 103,638 | 103,333 | 106,601 |
| Groundwater | 32,994 | 24,072 | 14,317 | 27,474 |
| Recycled Water | 29,103 | 30,116 | 30,468 | 29,522 |
| **Total** | **175,680** | **162,286** | **164,964** | **171,386** |

Note: FY 2017-2018 was the most recent water supply data made publicly available by WBMWD.
Source: WBMWD 2019.

*Metropolitan Water District*

Historically, the majority of the Cal Water's water demand is supplied by purchases from MWD. MWD is the largest water wholesaler for domestic and municipal uses in California, providing nearly 19 million people, with on average 1.7 billion gallons of water per day to a service area of approximately 5,200 square miles. MWD supplies water to its service area through a conveyance and distribution system that consists of the 242-mile-long Colorado River Aqueduct, five pumping plants, approximately 830 miles of pipeline, five water treatment plants, and nine reservoirs, plus a participation right in the SWP. MWD imports its water supplies from Northern California through the SWP's California Aqueduct and from the Colorado River by way of MWD's Colorado River Aqueduct. WBMWD and the City of Torrance are two of 26 member agencies that have preferential rights to purchase water from the MWD.

*Local Groundwater*

Cal Water owns water rights in the West Coast Groundwater Basin within the Hermosa-Redondo District service area. Cal Water relies on groundwater supplies extracted from the West Coast Basin's Silverado Aquifer to meet approximately 15 to 20 percent of the demand within the Hermosa-Redondo District service area (Cal Water 2016). Cal Water's adjudicated water rights are approximately 4,070 acre-feet per year (AFY). Between FY 2008-2009 and FY 2017-2018, the groundwater water demand within the Hermosa-Redondo District service area ranged from a low of 1,018 AF in FY 2008-2009 to a high of 2,186 AF in FY 2011-2012 (WBMWD 2019). Therefore, the groundwater demand within the Hermosa-Redondo District service area remains

[1] In FY 2017-2018, the WBMWD also supplied 7,740 AF of high-quality recycled water and imported water for two seawater barriers: the West Coast Basin Seawater Barrier and the Dominguez Gap Barrier. A seawater barrier is a series of injection wells positioned like a dam between the ocean and the groundwater aquifer. These wells inject water along the barrier to ensure that the water level near the ocean stays high enough to keep the seawater from seeping into the aquifer.

well below its adjudicated safe yield. However, various challenges have restricted the use of these local resources by Cal Water – particularly seawater intrusion issues. To prevent seawater intrusion, the Los Angeles County Flood Control District (LACFCD) maintains seawater barrier projects at the West Coast Basin Seawater Barrier and the Dominguez Gap Barrier. The Water Replenishment District of Southern California (WRD) purchases all of the water that is injected into the barriers and protects the basin through groundwater replenishment, deterrence of sea water intrusion, and groundwater quality monitoring of contamination through assessments on water pumped from the WRD service area (WBMWD 2019, 2020b). For further discussion of groundwater basin characteristics and hydrology, refer to Section 3.9, *Hydrology and Water Quality.*

*Recycled Water*

The remainder of water demand is met by Cal Water through recycled water supplies from the ECL Water Recycling Facility, which makes up approximately 1 percent of total water served to the Hermosa-Redondo District (Cal Water 2016). The facility's recycled water supply source is treated wastewater effluent from the Los Angeles Hyperion Wastewater Treatment Plant (Hyperion). The ECL Water Recycling Facility purchases approximately 37,600 AF, or roughly 13 percent of Hyperion's secondary effluent for treatment at the ECL Water Recycling Facility (WBMWD 2016). The ECL Water Recycling Facility's recycled water is treated to meet Title 22 of the California Code of Regulations (CCR) disinfected tertiary recycled water standards. Title 22 addresses specific treatment requirements for recycled water and lists approved uses. Approximately 2,000 tests are performed monthly at the ECL Water Recycling Facility to ensure water quality meets all Federal and State requirements (WBMWD 2016).

*The ECL Water Recycling Facility treats wastewater effluent from the Los Angeles Hyperion Wastewater Treatment Plant to supply recycled water for approved uses.*

The use of recycled water reduces the demand for potable water in the area. Cal Water recycled water supplies are primarily used for groundwater replenishment, landscape irrigation, and industrial process water. In calendar year (CY) 2015, ECL Water Recycling Facility delivered approximately 35,250 AF of recycled water to sites inside and outside its service area, saving enough potable water to serve roughly 70,500 households. Within ECL Water Recycling Facility's

service area, municipal and industrial recycled water use totaled 16,707 AF and seawater barrier 12,403 AF, which is about 9 percent of ECL Water Recycling Facility's current total water supplies (WBMWD 2016).

Water Demand

*Cal Water Hermosa-Redondo District Water Demand*

The annual water demand for the Hermosa-Redondo District service area from FY 2017-2018 was approximately 11,256 AF, including 9,951 AF (88.4 percent) imported water from MWD, 1,086 AF (9.6 percent) from local groundwater supplies, and 219 AF (1.9 percent) of recycled water from the ECL Water Recycling Facility (see Table 3.15-3; WBMWD 2019). The largest percentage of water use within the Hermosa-Redondo District is attributed to residential uses, which accounted for up to approximately 63.4 percent of total demand in 2015. Approximately 4.2 percent of total demand was attributed to system water losses (Cal Water 2016). As shown in Table 3.15-3, water demand for the Hermosa-Redondo District decreased from FY 2014-2015 to FY 2016-2017 and increased again in FY 2017-2018, but did not reach FY 2014-2015 levels.

**Table 3.15-3. Hermosa-Redondo District Water Demand from FY 2014-2016 to FY 2017-2018 (AF)**

| Water Supply Source | FY 2014-2015 | FY 2015-2016 | FY 2016-2017 | FY 2017-2018 |
|---|---|---|---|---|
| Imported Water | 10,098 | 9,169 | 9,280 | 9,951 |
| Groundwater | 1,896 | 1,541 | 1,397 | 1,086 |
| Recycled Water | 147 | 156 | 147 | 219 |
| **Total** | **12,141** | **10,866** | **10,824** | **11,256** |

Source: WBMWD 2019.

*Project Site Water Demand*

The existing campus generates demand for potable water associated with the existing medical, residential (i.e., Memory Care units), food service, and office uses on-site. Existing water demand for the Project site was estimated using indoor water demand factors from the California Emissions Estimator Model (CalEEMod) by land use type, consistent with Section 3.2, *Air Quality*. Landscaping irrigation demand was estimated based on the Water Supply Assessment for the Redondo Beach Water Front Project (Yarne & Associates, Inc. 2015). Based on these water demand factors and the total square footage and number of beds, the annual average water demand for the existing Project site is approximately 39,231,667 gallons per year (approximately 120.48 AFY) (John Labib & Associates 2020a).

**Table 3.15-4. Estimated Existing Project Site Water Demand**

| Existing Use | Waste Generation Factor | Size | Water Demand (gal/year) | Water Demand (gpm) |
|---|---|---|---|---|
| ***Beach Cities Advanced Imaging Building (510 North Prospect Avenue)*** | | | | |
| Medical Office | 125,481 gal per year per 1,000 sf | 52,000 sf | 6,525,012 | 12.41 |
| ***Providence Little Company of Mary Medical Institute (520 North Prospect Avenue)*** | | | | |
| Medical Office | 125,481 gal per year per 1,000 sf | 47,700 sf | 5,985,444 | 11.39 |
| ***Beach Cities Health Center (514 North Prospect Avenue)*** | | | | |
| Hospital | 89,814 gal per year per 1,000 sf | 60 beds | 5,388,840 | 10.25 |
| Medical Office | 125,481 gal per year per 1,000 sf | 158,000 sf | 19,825,998 | 37.72 |
| Landscaping | 18.25 gal per year per sf | 82,541 sf | 1,506,373 | 2.87 |
| | | **Existing Average Daily Flow** | **39,231,667** | **74.64** |

Notes: Indoor Water Demand rates are referenced from CalEEMod Appendix D, Table 9.1.
Landscaping water use estimate of 2.5 AFY per acre (18.25 gallons per year per sf) based on the Redondo Beach Water Front Project Water Supply Assessment (Yarne & Associates, Inc. 2015).
The existing above ground parking structure at 512 North Prospect Avenue does not generate water demand and therefore is not included.
Source: John Labib & Associates 2020a (see Appendix L).

Water Conservation

As required of all urban water suppliers by the California Department of Water Resources (DWR), Cal Water has prepared a responsive Water Shortage Contingency Plan designed to effectively enforce staged water use restrictions based on district water demands, agency supplies, and varying drought conditions. Likewise, WBMWD, as part of development of its Urban Water Management Plan (UWMP), has completed a Water Supply Allocation Plan designed to calculate member agency supply allocations in order to meet State mandated water use reduction targets (see Section 3.15.1.2, *Regulatory Setting – Water Infrastructure and Supply*).

As a result of extended drought conditions, both Cal Water and WBMWD water service agencies have elected to pursue measures which would ensure the reliability of water supplies, reduce customer water usage, and promote water conservation measures. Water conservation measures limit allocations of water supplies but ensure efficiency and distribution.

In FY 2017-2018, the Hermosa-Redondo District purchased its highest volume (i.e., 218.7 AF) of recycled water from WBMWD. WBMWD's recycled water line runs north through Torrance west into Redondo Beach and north along North Prospect Avenue, Flagler Lane, and Flagler Alley, adjacent to the east of the Project site (WBMWD 2019).

Future Water Demand and Projected Water Supply

The WBMWD's 2015 UWMP presents water demand projections through 2040 based on MWD's 2015 UWMP projections for total demand and water use efficiency (WBMWD 2016). Growth projections are used from the Southern California Association of Government's (SCAG's) 2012 Regional Transportation Plan (RTP) / Sustainable Community Strategy (SCS) (SCAG 2012).[2] Within MWD's forecast of total demand for WBMWD is an estimate of water conservation and a projection of retail demand after future water conservation is taken into account. This includes water conserved using best management practices (BMPs) from active, code-based, and price-effect conservation. Active conservation levels are derived by calculating water savings from all active program device-based savings installed to date. Code-based conservation levels are derived by calculating water savings from devices covered by existing water conservation ordinances and plumbing codes, including the state Model Water Efficient Landscape Ordinance, with replacement and new construction rates driven by demographic growth consistent with SCAG land use and transportation plans used to derive retail demand. Price-effect conservation is derived by calculating water savings by retail customers attributable to the effect of changes in the real (inflation adjusted) price of water. WBMWD's projected recycled water demands are based on WBMWD's planned projects for recycled water and desalination through 2030 as outlined in the Capital Implementation Master Plan. Between FY 2025 and FY 2040, WBMWD service area demands are projected to increase by approximately 5,806 AF, or 4.2 percent (see Table 3.15-5).

**Table 3.15-5. Projected WBMWD Supply**

| Water Supply | Projected Water Supply (AF) | | | | |
|---|---|---|---|---|---|
| | 2020 | 2025 | 2030 | 2035 | 2040 |
| Potable and Raw Water | 99,426 | 100,154 | 100,173 | 100,413 | 99,991 |
| Recycled Water | 38,894 | 44,135 | 44,135 | 44,135 | 44,135 |
| **Total** | **138,320** | **144,289** | **144,308** | **144,548** | **144,126** |

Source: WBMWD 2016.

Cal Water projects a slight (approximately 2 percent) increase in total water supplies, increasing from 11,256 AF in FY 2017-2018 to 12,747 AF in 2040 (Cal Water 2016). Due to a flat 4,070 AFY adjudicated right to WBMWD's Silverado Aquifer supplies, total available groundwater is projected to remain consistent through 2040 (see Table 3.15-6). Recycled water supplies are also projected to remain the same through 2040, with a recycled water supply of 150 AFY. The only

[2] The WBMWD's 2015 UWMP relies on the growth projections in the 2012 RTP/SCS. However, for transportation planning purposes, the SCAG recently prepared Connect SoCal, the 2020-2045 RTP/SCS (refer to Section 3.14, *Transportation*).

variable in total projected water supplies is imported water from MWD, which varies year-by-year based on service area demands and water use conservation.

**Table 3.15-6. Projected Hermosa-Redondo District Supplies**

| Water Supply | Projected Water Supply (AF) | | | |
|---|---|---|---|---|
| | 2025 | 2030 | 2035 | 2040 |
| Groundwater | 4,070 | 4,070 | 4,070 | 4,070 |
| Imported Water | 8,320 | 8,357 | 3,425 | 8,527 |
| Recycled Water | 150 | 150 | 150 | 150 |
| **Total** | **12,540** | **12,577** | **12,645** | **12,747** |

Source: Cal Water 2016.

The Cal Water Hermosa-Redondo District 2015 UWMP concludes that Cal Water's water supply is adequate to meet water demand under normal, single dry year, and multiple dry year conditions through the year 2040 (Cal Water 2016).

### 3.15.1.2 Regulatory Setting – Water Infrastructure and Supply

State Policies and Regulations

*California Urban Water Management Planning Act*

The Urban Water Management Planning Act (UWMPA) (California Water, Code Division 6, Part 2.6, Sections 10610 *et seq.*) was developed due to concerns over potential water supply shortages throughout California. The UWMPA requires information on water supply reliability and water use efficiency measures. As part of the UWMPA, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 AFY are required to develop and implement UWMPs to describe water supply, service area demand, population trends, and efforts to promote efficient use and management of water resources. An UWMP is intended to serve as a water supply and demand planning document that is updated every 5 years to reflect changes in the water supplier's service area including water supply trends, and conservation and water use efficiency policies.

*Senate Bill 610*

SB 610 became effective January 1, 2002. SB 610, codified in California Water Code, Division 6, Part 2.6, Sections 10910 *et seq.*, describes requirements for water supply assessments and UWMPs applicable to the California Environmental Quality Act (CEQA) process. SB 610 requires that water suppliers must prepare a water supply assessment for projects that are subject to CEQA and exceed a specified minimum size to determine whether the projected water demand associated with the project is included as part of the most recently adopted UWMP. The size requirement is

specified according to development type but generally includes developments with water consumption that would be equivalent to or greater than the amount of water required by a 500-dwelling unit project. The proposed Project includes 157 new Assisted Living units and 60 replacement Memory Care units, which is substantially below this 500-dwelling unit threshold. Therefore, a water supply assessment is not required for the proposed Project.

*California Code of Regulations, Title 20*

Title 20 of the California Code of Regulations, Sections 1605.1(h) and 1605.1(i) establishes efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads, lavatory faucets, and flush toilets. Amongst these standards, the maximum flow rate is 1.2 gpm at 60 psi for residential lavatory faucets and aerators, 1.8 gpm with optional temporary flow of 2.2 gpm at 60 psi for kitchen faucets and aerators, 0.5 gpm at 60 psi for public lavatory faucets, and 1.8 gallons per flush for flush toilets, effective January 1, 2016. Additionally, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

*California Green Building Standard Code (CALGreen)*

CALGreen builds on standards established under Title 20 of the CCR and sets forth water efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures. Updates to CALGreen were published July 1, 2019 and became effective January 1, 2020. Mandatory standards for water use are shown in Table 3.15-7.

**Table 3.15-7. CALGreen Mandatory Maximum Flow Rates**

| Fixture Type | Maximum Allowable Flow Rate – Residential | Maximum Allowable Flow Rate – Nonresidential |
|---|---|---|
| Showerheads | 1.8 gpm at 80 psi | 2.0 gpm at 80 psi |
| Lavatory Faucet | 1.2 gpm at 60 psi | 0.5 gpm at 60 psi |
| Kitchen Faucet | 1.8 gpm at 60 psi | 1.8 gpm at 60 psi |
| Water Closets | 1.28 gallons per flush | 1.28 gallons per flush |
| Floor-mounted Urinals | 0.5 gallons per flush | 0.5 gallons per flush |
| Wall-mounted Urinals | 0.125 gallons per flush | 0.125 gallons per flush |

Source: CALGreen Building Standards Code Section 4.303.

*Health and Safety Code Section 17921.3*

Requires low-flush toilets and urinals in all buildings, including commercial, residential, institutional, and industrial buildings.

*California Fire Code*

The 2016 California Fire Code is one of 12 parts of an official compilation referred to as the California Building Standards Code. The purpose of the California Fire Code is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The California Fire Code includes standards for water supply and pressure to adequately support firefighting capabilities, including appendix standards for automatic fire sprinkler systems that reduce water demands to a building for firefighting reduce up to 75 percent with a minimum required fire-flow 1,500 gpm. The latest California Fire Code published by the California Building Standards Commission were adopted in 2016 and became effective January 1, 2017.

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Utilities Element*

The goals of the Redondo Beach General Plan Utilities Element are to provide a modern and efficient system of transmission, distribution, and storage of water supplies to the City capable of meeting the normal daily and peak hour demands of the community, including adequate fire flow requirements, and to meet existing and future water demand in a timely and cost-effective manner.

Objective 6.1: Provide a comprehensive and modern system of sanitary sewer collection and treatment facilities which will adequately collect, convey, and treat sewerage generated by existing and future development in the city. The services shall be provided and system operated in an ecologically-sensitive manner.

Policy 6.1.5 Require that the approval of new development in the city be contingent upon the ability of the project to be served with adequate sanitary sewer infrastructure and service.

Policy 6.1.10 Examine the feasibility and potential for the use of reclaimed water for irrigation and cleaning purposes, in both public and private facilities.

Objective 6.2: Ensure the provision of a comprehensive and modern system of storm drainage facilities that will adequately collect, convey, and remove/dispose of the quantities of storm water and excess water that are generated in the

city. The services shall be provided and system operated in an ecologically-sensitive manner.

Policy 6.2.3 Require that the approval of new development in the city be contingent upon the ability of the project to be served with adequate storm drainage infrastructure and service.

Policy 6.2.7 Require that improvements to or expansion of existing storm drainage facilities necessitated by specific new development projects be borne by the project proponent, either through the payment of impact fees or the actual construction of such improvements.

Objective 6.3: Provide a modern and efficient system of transmission, distribution, and storage of water supplies to the City capable of meeting the normal daily and peak hour demands of the community, including adequate fire flow requirements, to meet existing and future water demand in a timely and cost effective manner.

Policy 6.3.1 Ensure the provision of adequate water supply, transmission, distribution, and storage, throughout the city to serve the community's residential, industrial, commercial, and recreational needs.

Policy 6.3.2 Ensure the provision and construction of upgraded and expanded water supply, transmission, distribution, and storage facilities throughout the city to support existing and future development.

Policy 6.3.3 Ensure the maintenance and replacement of existing water supply, transmission, distribution, and storage facilities, as necessary to adequately serve the city's water needs.

Policy 6.3.4 Require that the approval of new development in the city be contingent upon the ability of the project to be served with adequate water infrastructure and service.

Policy 6.3.7 Ensure that the costs of specific improvements to the existing water supply, transmission, distribution, and storage facilities necessitated by a new development project be borne by the project proponent; either through the payment of impact fees, or by the actual construction of the necessary physical improvements.

Policy 6.3.12 Require that development projects of sufficient scale to make it economically feasible incorporate dual pipe systems for the use of reclaimed water for irrigation and other State and County health approved purposes where these uses are accessible to trunkline distribution service.

Policy 6.3.14 Require that large scale development projects evaluate the feasibility of and where feasible incorporate gray water re-capture, storage, and distribution systems.

*Redondo Beach General Plan Land Use Element*

The City's Land Use Element includes policies that promote water conservation and sustainability:

Policy 1.55.7 Encourage the use of drought-tolerant species in landscape design.

Policy 1.55.8 Require that development incorporate adequate drought-conscious irrigation systems and maintain the health of the landscape.

Policy 1.55.9 Require that all landscape be adequately irrigated with automatic irrigation systems.

Policy 1.55.10 Use reclaimed water for the irrigation of public and private landscape, as available.

Policy 1.56.10 Require that street landscape incorporate a drought-conscious irrigation system or other methods to provide proper watering, where irrigation systems are required.

*Redondo Beach Municipal Code*

The Redondo Beach Municipal Code (RBMC) establishes fire extinguishing requirements and water conservation measures.

Section 3-4.111 – Fire Extinguishing Systems. Requires an automatic sprinkler system throughout every new structure except in occupancies under 750 sf. All piping and attached appurtenances subjected to system working pressure shall be hydrostatically tested at gauge pressure of 200 psi (13.8 bar) or 50 psi (3.4 bar) in excess of the system working pressure, whichever is greater, and shall maintain that pressure at gauge pressure of +/- 5 psi (0.34 bar) for 2 hours.

Section 9-23.01 – Adoption of 2019 California Green Building Standards Code. The City adopted a Green Building Ordinance in 2008, with updates in 2019. This ordinance requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction, major remodels, and new or remolded landscapes.

Section 10-2.1900 – Landscaping Regulations. Requires the use of drought-tolerant plants where feasible. Recommended drought-tolerant plant species are listed in the City of Redondo Beach List of Recommended Trees and Water Conserving Plants maintained by the Superintendent of Parks. Other plants consistent with the intent of this section, but not included in the List of Recommended Trees and Water Conserving Plants, may be approved by the Community Development Director. This section also adopts the California State Model Water Efficient Landscape Ordinance by reference.

#### 3.15.1.3 Impact Assessment Methodology – Water Infrastructure and Supply

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on water infrastructure and supply if:

a) The project would require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects; and/or

b) The project would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Methodology

The proposed Project has been evaluated to determine projected utility demands for the proposed Project and its effects on the water supply as well as the current capacity of water infrastructure . The proposed Project was evaluated for impacts to potable water utilities based on data published by the WBMWD and Cal Water and a Water Memorandum for the proposed Project (John Labib & Associates 2020a).

The ability of the local water lines to serve the Project site was analyzed based on John Labib and Associates' (2020a) calculated fire flow at the fire hydrant located adjacent to southern driveway

into the Project site (see Appendix L). The results of fire flow testing were analyzed to calculate adequate pressure and flow for firefighting purposes. John Labib & Associates prepared a Water Memorandum for the proposed Project (see Appendix L). The analysis of water supply estimates the total water demand generated by the proposed Project and compares that demand to Cal Water's available water supply. Potential impacts resulting from the proposed Project were compared with criteria from CEQA Appendix G to assess their significance.

#### 3.15.1.4 Project Impacts and Mitigation Measures – Water Infrastructure and Supply

Impact Description (UT-1)

a) *The project would require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.*

**UT-1** **Implementation of the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would increase the overall operational water demand at the Project site. However, with the exception of on-site trenching for the new connection to the 8-inch water line located along North Prospect Avenue, the proposed Project would not require or result in the substantial construction or expansion of existing water facilities. Therefore, potential impacts to water infrastructure would be *less than significant.***

*Construction*

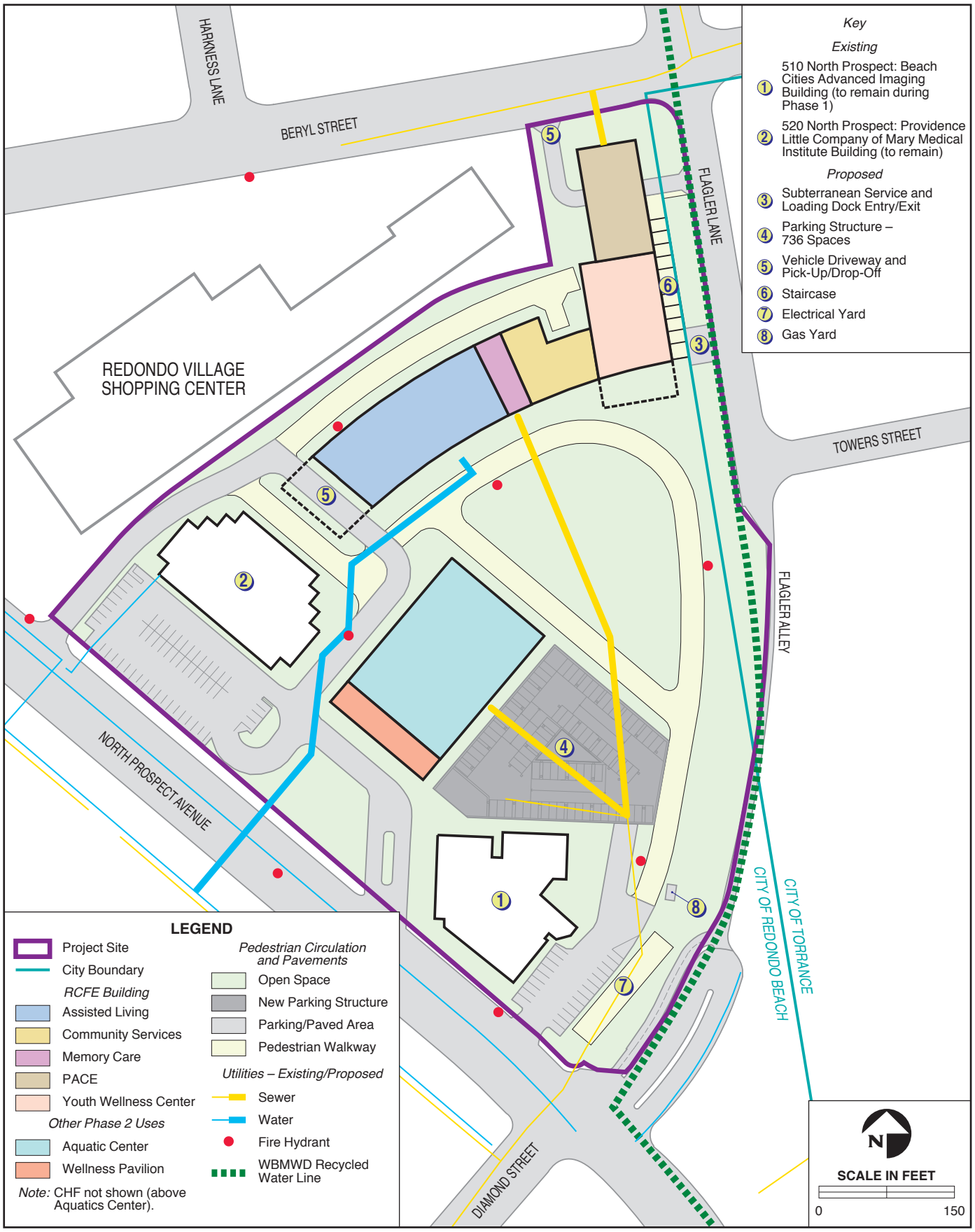
As described in Section 2.5.1.6, *Construction Activities*, Section 3.2, *Air Quality*, and Section 3.6, *Geology and Soils* (refer to Impact GEO-2) construction of the proposed Project would require water for dust control, equipment cleaning, soil excavation and export, and re-compaction and grading activities. Based on a review of construction projects of similar size, duration, and type of construction (e.g., The Plaza and the Ocean Avenue Project located in the City of Santa Monica), water use is conservatively estimated at 1,000 to 2,000 gpd during construction, depending on the construction phase (e.g., demolition, excavation, building construction, etc.). Temporary construction-related water use would be less than 2 percent of the existing water consumption at the Project site, which is estimated to be approximately 107,484 gpd (refer to Table 3.15-4) and could be accommodated by the existing water infrastructure on-site. Overall, temporary construction-related impacts associated with water demand and water infrastructure would be *less than significant*.

As described in Section 2.5.1.4, *Utilities and Services,* water would be supplied by Cal Water from the existing 8-inch water line located along North Prospect Avenue. The proposed Project would connect to Cal Water's water supply system with a new lateral line installed within the Project site (see Figure 3.15-2). The new lateral would connect the proposed Residential Care for the Elderly (RCFE) Building to the 8-inch water line northwest of the central driveway. The existing 8-inch lateral connecting to the Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) would remain protected in place during construction. None of the other existing water lines would be affected by the proposed Project. In addition to the proposed laterals, the Project may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water). Construction associated with the installation of laterals and the potential installation of a purple pipe connection would primarily involve minor trenching on-site.

Given the location of the campus and the existing water infrastructure within the Redondo Beach, all work associated with the proposed water lateral would be subject to review and approval by the Redondo Beach Department of Public Works. All appropriate permits (e.g., public right-of-way permits associated with connections to off-site the water distribution system) would be obtained, as necessary. The construction contractor would be required to notify the Redondo Beach Department of Public Works in advance of ground disturbance activities to existing avoid water lines and/or disruption of water service to off-site properties. Compliance with all required permit requirements enforced by the Redondo Beach Department of Public Works would ensure that temporary impacts on water supply and infrastructure during construction activities would be *less than significant.*

*Operation*

In order to assess the operational water infrastructure needs associated with the proposed Project, John Labib & Associates prepared a Water Memorandum (see Appendix L). Domestic water demand is the primary contributor to water consumption associated with the proposed Project (see Impact UT-2); fire flow represents the peak water demand on the City's water infrastructure, including water flow and pressure.




wood.

**Proposed Utilities at the Project Site**

**FIGURE 3.15-2**

The average water demand associated with the proposed Project is 45,431,840 gallons per year (86.44 gpm) during Phase 1 and 56,426,355 gallons per year (107.35 gpm) during Phase 2. Additionally, John Labib & Associates assessed the flow requirements based on the size of the largest building included in the proposed Project. The proposed Project would generate a maximum demand of approximately 107.35 gpm of domestic water and 5,750 gpm of fire water totaling 5,857.35 gpm. As measured by the fire flow test conducted for the proposed Project, the maximum allowable flow from the main is 2,513 gpm, which is less than the required fire flow. However, new buildings developed under the proposed Project, including the proposed parking structure would include automatic sprinklers, which reduce required fire flow of buildings by up to 75 percent. As such, incorporation of automatic sprinklers in new buildings would create a minimum fire flow requirement of 1,437.5 gpm and total domestic and fire flow requirement of 1,464.3 gpm. Therefore, the existing water flow and pressure is adequate to serve the proposed Project in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020a).

Although net average daily water demand would increase by approximately 6,200,173 gallons per year (11.8 gpm), no upgrades to public water mains would be needed under the proposed Project. Cal Water's potable water system has the infrastructure and the capacity to serve the proposed Project. With regard to the use of recycled water for operational landscaping irrigation, the proposed Project may use recycled water from the WBMWD's recycled water line, located adjacent to the Project site. These options would be explored as final design plans are further developed. The ECL Water Recycling Facility currently operates 55 percent of capacity; therefore, use of recycled water would not require an expansion of this facility.

Cal Water's water network has adequate capacity, and the proposed Project would not result in the need for new or additional water infrastructure. Impacts to water infrastructure would be *less than significant*.

<u>Impact Description (UT-2)</u>

*b) The project would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.*

**UT-2 The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in an overall increase in water demand, but this water demand would be adequately met by existing and planned future water supplies. This impact would be *less than significant.***

As described in Section 3.15.1.1, *Environmental Setting – Water Infrastructure and Supply*, the existing water demand associated with the Project site is approximately 39,231,667 gallons per year (107,484 gpd) (John Labib & Associates 2020a). The proposed uses associated with Phase 1 of the proposed Project would increase water demand at the Project site. Using CalEEMod water demand factors, John Labib & Associates (2020A) calculated a projected Phase 1 water demand of 45,822,139 gallons per year (125,540 gpd) (see Table 3.15-8). Therefore, the proposed Phase 1 operations would increase water demand by approximately 6,590,469 gallons per year (18,056 gpd) or 16.8 percent of existing water demand.

**Table 3.15-8. Projected Water Demand for Phase 1 of the Proposed Project**

| Proposed Use | Water Consumption Factor | Size | Water Demand (gal/year) | Water Demand (gpm) |
|---|---|---|---|---|
| ***Assisted Living*** | | | | |
| Studio Unit | 65,154 gal/year per DU | 37 units | 2,410,698 | 4.59 |
| Single-Bedroom Unit | 65,154 gal/year per DU | 100 units | 6,515,400 | 12.40 |
| Two-Bedroom Unit | 65,154 gal/year per DU | 20 units | 1,303,080 | 2.48 |
| Common Areas | 125,481 gal/year per 1,000 sf | 84,000 sf | 10,540,404 | 20.05 |
| ***Memory Care*** | | | | |
| Two-Bedroom Unit | 65,154 gal/year per DU | 60 units | 3,909,240 | 7.44 |
| Common Areas | 125,481 gal/year per 1,000 sf | 24,500 sf | 3,074,285 | 5.85 |
| ***PACE Services*** | | | | |
| Medical Office | 125,481 gal/year per 1,000 sf | 14,000 sf | 1,756,392 | 3.34 |
| ***Community Services*** | | | | |
| Office | 177,734 gal/year per 1,000 sf | 6,270 sf | 1,114,392 | 2.12 |
| ***Youth Wellness Center*** | | | | |
| Counseling Center | 42,890 gal/year per 1,000 sf | 9,100 sf | 390,299 | 0.74 |
| ***Landscaping and Irrigation*** | | | | |
| Landscaping Irrigation Demand | 18.25 gal/year per sf | 125,890 sf | 2,297,493 | 4.37 |
| 510 and 520 North Prospect Avenue to Remain (refer to Table 3.15-4) | | | 12,510,456 | 23.80 |
| Average Daily Demand | | | 45,822,139 | 87.18 |

Notes: Indoor Water Demand rates are referenced from CalEEMod Appendix D, Table 9.1.
Landscaping water use estimate of 2.5 AFY per acre (18.25 gallons per year per sf) based on the City of Redondo Beach Water Front Project Water Supply Assessment (Yarne & Associates, Inc. 2015).
Some uses do not generate water demand (e.g., the existing above ground parking structure at 512 North Prospect Avenue, janitorial closets, storage, etc.) and therefore, are not included.
Source: John Labib & Associates 2020a; see Appendix L.

The proposed Wellness Pavilion, Aquatic Center, and Center for Health and Fitness (CHF) uses associated with Phase 2 of the proposed Project would further increase water demand at the Project

site. John Labib & Associates (2020a) calculated a water demand of 56,426,355 gallons per year (154,593 gpd) (174.92 AFY) for the Phase 2 development program (see Table 3.15-9). Therefore, the proposed Project would increase the existing water demand by approximately 17,194,688 gallons per year (52.8 AFY), a 43.8 percent increase over the existing demand.

**Table 3.15-9. Projected Water Demand for Phase 2 of the Proposed Project**

| Proposed Use | Water Use Factor | Size | Water Demand (gal/year) | Water Demand (gpm) |
|---|---|---|---|---|
| ***Wellness Pavilion*** | | | | |
| Office | 177,734 gal/year per 1,000 sf | 19,271 sf | 3,425,112 | 6.52 |
| Research and Development | 491,694 gal/year per 1,000 sf | 5,000 sf | 2,458,470 | 4.68 |
| Restaurant | 303,534 gal/year per 1,000 sf | 5,782 sf | 1,755,034 | 3.34 |
| ***Aquatic Center*** | | | | |
| Health Club/Spa | 59,143 gal/year per 1,000 sf | 27,015 sf | 1,597,748 | 3.04 |
| Office | 177,734 gal/year per 1,000 sf | 1,813 sf | 322,232 | 0.61 |
| ***Center for Health and Fitness*** | | | | |
| Health Club/Spa | 59,143 gal/year per 1,000 sf | 20,000 sf | 1,182,860 | 2.25 |
| ***Landscaping*** | | | | |
| Landscaping Irrigation Demand | 18.25 gal/year per sf | 118,370 sf | 2,160,253 | 4.11 |
| 510 and 520 North Prospect Avenue to Remain (refer to Table 3.15-4) | | | 12,510,456 | 23.80 |
| Phase 1 Water Use (refer to Table 3.15-8) | | | 31,014,190 | 59.01 |
| Average Daily Demand | | | 56,426,355 | 107.35 |

Notes: Indoor Water Demand rates are referenced from CalEEMod Appendix D, Table 9.1.
Landscaping water use estimate of 2.5 AFY per acre (18.25 gallons per year per sf) based on the City of Redondo Beach Water Front Project Water Supply Assessment (Yarne & Associates, Inc. 2015).
Some uses do not generate water demand (e.g., the existing above ground parking structure at 512 North Prospect Avenue, janitorial closets, storage, etc.) and therefore, are not included.
Counseling center has been assumed to have the same demand as a day-care center.
Restaurant has been conservatively assumed to have the same demand as a High turnover sit down restaurant.
Due to the programmatic nature of the Phase 2 development program, the provided water use factors for the Aquatics Center represent estimates based on similar uses. Health Club/Spa represent fitness centers that have both fitness equipment as well as indoor and outdoor pools.
Source: John Labib & Associates 2020a; see Appendix L.

However, the increase in water demand associated with the proposed Project (17,194,688 gallons per year; 52.8 AFY), would represent less than 1 percent of the total water supply of the projected Hermosa-Redondo District Supplies. Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the California Public Utilities

Commission (CPUC) (Cal Water 2019). No new or expanded water entitlements are necessary for the proposed Project.

Additionally, the proposed Project may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water). Recycled water could be used to reduce overall water demand, consistent with the Redondo Beach General Plan Land Use Element (e.g., Policy 1.55.10) associated with operational landscaping irrigation. Proposed uses for recycled water include landscape irrigation and architectural water features, water for mechanical cooling towers, and water for toilet flushing. Overall, the proposed Project would be consistent with local policies (e.g., City of Redondo Beach Green Building Codes) and impacts on potable water use associated with Project operations would be *less than significant*.

Cumulative Impacts – Water Infrastructure and Supply

The geographic context for cumulative impacts analysis on local water supplies is the Cal Water Hermosa-Redondo District service area. A cumulative impact related to water infrastructure and supply would result if the potential impacts associated with the proposed Project, when combined with other past, present, and future projects (refer to Table 3.0-1), would require construction of new or expanded water infrastructure, would require new or expanded entitlements, or would adversely affect the ability of the Hermosa-Redondo District to continue to meet its goal for 128 gallons per capita per day by 2020.

*Water Infrastructure*

The proposed Project, along with other past, present, and future projects in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach would cumulatively increase the demand on the existing water distribution system and could potentially require relocation or construction of new or expanded water infrastructure, the construction or relocation of which could cause significant environmental effects. However, as with the proposed Project, individual projects would be subject to review by the permitting city to ensure that the existing water lines would be adequate to meet domestic water and fire flow demands. Cal Water regularly conducts evaluations to ensure its water infrastructure system is adequate to meet service needs and infrastructure system improvements would be implemented as needed as part of its Capital Implementation Master Plan. The Hermosa-Redondo District Infrastructure Improvement Plan identified 22,239 feet of water line segments within the Hermosa-Redondo District that appear to be undersized or operating at or near capacity and need to be upgraded between 2019 and 2021 (Cal Water 2018). Replacement of these water lines would require excavation, cut/cap or removal of older water lines, and installation of the new water lines located within existing paved streets and public rights-of-way.

This would involve typical short-term construction impacts, such as criteria air pollutant emissions (refer to Section 3.2, *Air Quality*), noise (refer to Section 3.11, *Noise*), and disruption of pedestrian, bicycle, and vehicle traffic (refer to Section 3.14, *Transportation*). The City of Redondo Beach's ongoing efforts to maintain and upgrade public infrastructure would ensure that the infrastructure system remains adequate for existing and planned future demands. However, as described in Impact UT-1, implementation of the proposed Project would not substantially affect water lines serving the Project site. Therefore, the proposed Project *would not result in a considerable contribution to cumulatively considerable impacts* on water infrastructure.

*Water Demand and Supply*

Cumulative water supply impacts are considered on a local and regional basis in accordance with the Cal Water Hermosa-Redondo District's 2015 UWMP, adopted by Cal Water in June 2016. The UWMP takes into consideration SCAG growth projections and local General Plan land use data. (The proposed Project is consistent with future SCAG growth projections; refer to Section 3.12, *Population and Housing*). As discussed under Impact UT-1 above, implementation of the proposed Project would result in a net increase in water demand at the Project site compared to existing conditions. However, as described in Section 3.15.1.1, *Environmental Setting – Water Infrastructure and Supply*, Cal Water has concluded that the Hermosa-Redondo District will have adequate water supplies to meet projected demands under normal, single dry year, and multiple dry year conditions through the year 2040. The contribution of the proposed Project to cumulative impacts on local water supplies would be negligible in comparison to existing and future planned water supplies in the Hermosa-Redondo District (i.e., less than 1 percent). The proposed Project would comply with regulatory standards to implement water conservation strategies and minimize indoor water use. Therefore, while the proposed Project would incrementally contribute cumulative demand, Cal Water would continue to effectively manage its water demand and significantly expand its water conservation programs that focus on reducing urban water use to meet future cumulative demand. Therefore, the proposed Project *would not result in a substantial contribution to a cumulatively considerable impacts* on water supply.

## 3.15.2 Wastewater Collection, Conveyance, and Treatment

### 3.15.2.1 Environmental Setting – Wastewater Collection, Conveyance, and Treatment

<u>Wastewater Management</u>

The Redondo Beach Department of Public Works Sewer & Storm Drain Maintenance Division is responsible for all facilities that support the collection and conveyance of wastewater and

stormwater runoff necessary to protect the community from system overflows, reduce local flooding, and promote overall water quality of the marine environment. The City of Redondo Beach's sewer system consists of approximately 113 miles of sewer lines, 15 pump stations, and 9 backup generators (City of Redondo Beach 2020a). A System Evaluation and Capacity Assurance Plan (SECAP) and Rehabilitation and Replacement Program (RRP) was prepared for the City of Redondo Beach in 2010 to evaluate the sewer collection system and provide a framework for undertaking the construction of new and replacement facilities. During the 5-year period between January 2007 and December 2011, the City of Redondo Beach reported 58 sanitary sewer overflows (SSOs), of which 33 percent were attributed to root intrusion; 20 percent to pump station failure; and 13 percent to fats, oils, and grease. Approximately 1 mile of the system was calculated to have capacity issues and four locations (i.e., Lucia Street, Pacific Coast Highway, Helberta Street, and Esplande Street) have experienced repeat SSOs (USEPA 2011). However, these locations are more than 0.9 miles ~~of~~from the Project site; SECAP shows no deficiencies within the boundaries of the Project site. Approximately 5 percent (i.e., 28,247 feet) of the City of Redondo Beach's sewer system is identified as an area of concern and recommended for annual inspection, as compared to the areas considered to have no deficiencies, which are inspected every 10 years (USEPA 2011).

Wastewater Treatment

Wastewater is collected through the City of Redondo Beach sewer systems, which flows into the Los Angeles County Sanitation District (LACSD) interceptors and is ultimately conveyed for treatment to the Joint Water Pollution Control Plant (JWPCP), located approximately 6 miles southeast of the City of Redondo Beach in the City of Carson. The JWPCP is part of the South Bay Cities Sanitation District, one of the 24 independent districts making up the LACSD. The South Bay Cities Sanitation District provides wastewater collection and treatment to the following eight cities: El Segundo, Hermosa Beach, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills Estates, and Torrance. The JWPCP facility provides primary and secondary treatment for approximately 261.1 million gallons per day (mgd), and has a total permitted capacity of 400 mgd, making it one of the largest wastewater treatment plants in the world (LACSD 2015, 2020a).

Effluent from the JWPCP is required to meet the Los Angeles Regional Water Quality Control Board's (RWQCB's) requirements for the Pacific Ocean. The Los Angeles RWQCB imposes performance standards on water quality that are more stringent than the standards of the National Pollution Discharge Elimination System (NPDES) permit required under the Clean Water Act. Accordingly, JWPCP effluent to the Pacific Ocean is continually monitored by the South Bay

Cities Sanitation District to ensure that it meets or exceeds prescribed standards (Los Angeles RWQCB 2017).

Project Site Sewer System

The Project site is served by one 8-inch local sanitary sewer line located along Diamond Street, with one tie-in to the Project site located near the southern driveway (refer to Figure 3.15-1). The 8-inch sewer lateral connects to the Beach Cities Health Center (514 North Prospect Avenue) and additional 6-inch laterals, which connect to the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) and Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue). An additional local sewer line is located along Beryl Street north of the Flagler Lot; however, this line does not tie-in to the Project site. According to City of Redondo Beach records of the existing sewer infrastructure, the Project site is the most upstream point of the 8-inch local sewer main. Wastewater and sewage collected by this sewer line is conveyed to an 8-inch gravity sewer main located at the intersection of North Prospect Avenue and Diamond Street. The capacity of the existing 8-inch sewer main is a maximum flow of approximately 4 inches (i.e., 50 percent) and 668,593 gpd. In a letter dated September 22, 2020, LACSD indicated that the wastewater flow originating from the Project site discharges from the local sewer line, which is not maintained by LACSD, for conveyance to LACSD's South Bay Cities Main Trunk Sewer, located in Gertruda Avenue at Catalina Avenue. LACSD's 20-inch diameter lined trunk sewer has a capacity of 2.4 mgd and conveyed a peak flow of 0.3 mgd when last measured in 2015 (LACSD 2020b).

Wastewater generation and sewer flows were estimated for the existing development at the Project site by John Labib & Associates in a site-specific Sewer Capacity Study prepared in August 2020 (see Appendix L). Existing wastewater generation for the Project site was estimated using Sewer Generation Factors established in the City of Los Angeles CEQA Thresholds Guide (2006) for each existing building use. Based on the City of Los Angeles CEQA Thresholds Guide (2006), the 8-inch sewer line located along Diamond Street conveys an average daily flow of approximately 68,925 gpd from the Project site (see Table 3.15-10; see Appendix L).

**Table 3.15-10. Estimated Existing Project Site Wastewater Generation**

| Existing Use | Wastewater Generation Factor | Size | Average Daily Flow (gpd) |
|---|---|---|---|
| ***Beach Cities Advanced Imaging Building (510 North Prospect Avenue)*** | | | |
| Medical Office | 250 gpd per 1,000 sf | 52,000 sf | 13,000 |
| ***Providence Little Company of Mary Medical Institute (520 North Prospect Avenue)*** | | | |
| Medical Office | 250 gpd per 1,000 sf | 47,700 sf | 11,925 |
| ***Beach Cities Health Center (514 North Prospect Avenue)*** | | | |
| Hospital | 75 gpd per bed | 60 beds | 4,500 |
| Medical Office | 250 gpd per 1,000 sf | 158,000 | 39,500 |
| | | **Existing Average Daily Flow** | **68,925** |

Notes: Hospital assumes same uses as Memory Care units.
The existing above ground parking structure, Maintenance Building, and mechanical rooms do not generate wastewater and therefore, are not included.
Wastewater Generation Factors are based on sewer flow estimates from Exhibit M.2-22 of the City of Los Angeles CEQA Thresholds Guide (2006).
Source: John Labib & Associates 2020b (see Appendix L).

### 3.15.2.2 Regulatory Setting – Wastewater Collection, Conveyance, and Treatment

Federal Policies and Regulations

*Federal Water Pollution Control Act (1948)*

The Federal Water Pollution Control Act, which was expanded in 1972 and is commonly known as the Clean Water Act, is a comprehensive statute aimed at restoring and maintaining the chemical, physical, and biological integrity of the nation's waters, including discharge waters of wastewater treatment processes. The Clean Water Act, in combination with other Federal environmental laws, regulates the location, type, planning, and funding of wastewater treatment facilities.

*National Pollutant Discharge Elimination System*

As authorized by the Clean Water Act, the NPDES program regulates point sources that discharge pollutants into waters of the U.S. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. The NPDES permit system is authorized and implemented by States and local water boards.

State Policies and Regulations

Operation of the JWPCP is subject to regulations set forth by the California Department of Public Health and the State Water Resources Control Board (SWRCB) in compliance with the Clean Water Act and NPDES program.

Regional Policies and Regulations

*Los Angeles Regional Water Quality Control Board*

Waste discharge pursuant to NPDES regulations for the LACSD water reclamation plant, (i.e., the JWPCP in Carson) are set forth in Los Angeles RWQCB Order No. R4-2017-0180, issued in 2017. This order sets discharge prohibitions (e.g., discharges that degrade water supplies) and effluent limitations and discharge specifications.

*Los Angeles County Sanitation District*

Capital improvements to the LACSD water reclamation plants are funded from connection fees charged to new developments, redevelopments, and expansions of existing land uses. The connection fee is a capital facilities fee used to provide additional conveyance, treatment, and disposal facilities (i.e., capital facilities) required by new users connecting to the LACSD's sewerage system or by existing users who significantly increase the quantity or strength of their wastewater discharge. The Connection Fee Program ensures that all users pay their fair share for any necessary expansion of the system. LACSD establishes discharge limits for wastewater discharges within its service areas to prevent discharge of substances to LACSD sewers that would exceed the treatment capacities or otherwise damage LACSD water reclamation facilities (LACSD 2020b). The discharge limits enable water reclamation facilities to maintain their effluents within Los Angeles RWQCB wastewater discharge requirements.

*Clearwater Program Master Facilities Plan*

The Sanitation Districts of LACSD prepared the Clearwater Program Master Facilities Plan in November 2012 to identify a recommended plan that will meet the wastewater management needs of the Joint Outfall System through the year 2050. The Joint Outfall System is a regional, interconnected system of wastewater conveyance and treatment facilities within and under the jurisdiction of the 17 Sanitation Districts that participate in the Joint Outfall Agreement. The Clearwater Program Master Facilities Plan provides past, current, and projected water and wastewater volumes and evaluates the needs of the system. The plan also provides a guiding plan with programs to implement the recommended system improvements.

*Los Angeles County Wastewater Ordinance*

The Los Angeles County Wastewater Ordinance, adopted on April 1, 1972 and amended on July 1, 1998. The ordinance, among other things, regulates sewer construction and provides for the approval of plans for sewer construction and implements Federal and State pollution control regulations.

*Los Angeles County Connection Fee Ordinance and Program*

Capital improvements to LACSDs' water reclamation plants are funded from connection fees charged to new developments, redevelopments, and expansions of existing land uses. The connection fee is a capital facilities fee used to provide additional conveyance, treatment, and disposal facilities (i.e., capital facilities) required by new users connecting to the LACSDs' sewerage system or by existing users that significantly increase the quantity or strength of their wastewater discharge. The purpose of the Ordinance is to impose fees for the privilege of connecting facilities to the sewerage system or for the privilege of increasing the strength or quantity of wastewater discharged into connected facilities, and to provide for the collection of those fees. Revenue derived under the ordinance is used for expansion of the LACSDs' capital facilities and to fund loans as provided for in the ordinance.

### 3.15.2.3 Impact Assessment Methodology – Wastewater Collection, Conveyance, and Treatment

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For the purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on wastewater infrastructure if:

a) The project would require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; and/or

b) The project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Methodology

The proposed Project was evaluated for potential impacts to wastewater utilities based on data published by the LACSD and RWQCB, information provided by the City of Redondo Beach's

SECAP and RRP and the Sewer Capacity Study prepared for the proposed Project and peer reviewed by Wood Environment & Infrastructure Solutions, Inc. (see Appendix L). Projected wastewater generation was calculated using Wastewater Generation Factors from Exhibit M.2-22 of the City of Los Angeles CEQA Thresholds Guide (2006).

Projected wastewater utility demands for the proposed Project were compared with the capacity available for allocation within Redondo Beach. Potential impacts resulting from the proposed Project were compared with criteria from the Los Angeles RWQCB, CEQA, and Appendix G to assess their significance. Impacts associated with trenching for sewer utilities are discussed in Section 3.6, *Geology and Soils.*

#### 3.15.2.4 Project Impacts and Mitigation Measures – Wastewater Collection, Conveyance, and Treatment

Impact Description (UT-3)

*a) The project would require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.*

**UT-3 Implementation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in an increase in operational wastewater generation at the Project site as compared to existing conditions. Environmental effects associated with the construction of wastewater facilities would be *less than significant*.**

*Construction*

During construction of the proposed Project, existing uses at the Beach Cities Health Center and the attached Maintenance Building would remain in place until the completion of the RCFE Building, after which they would be re-located, therefore, existing wastewater generation would remain throughout construction. During construction, portable toilets would be provided by a private waste management company for use by construction workers and the waste would be disposed of off-site. Additionally, given the depth to groundwater, it is not anticipated that groundwater would be encountered during construction; therefore, the construction area would not need to be dewatered and no groundwater would be extracted or discharged to the existing sewer system. Therefore, construction activities would not generate wastewater flows and would not, along with existing and projected wastewater flows, approach the existing capacity of the JWPCP.

The facilities developed under the proposed Project would connect to the City of Redondo Beach's sewer system with new connections to the 8-inch sewer line along Diamond Street and a new connection the 8-inch sewer main along Beryl Street (refer to Figure 3.15-2). (Neither the existing facilities nor the proposed facilities on the campus would discharge wastewater to the City of Torrance sewer system.) Construction impacts would primarily involve trenching on-site to install the new sewer connections. Prior to ground disturbance, all proposed work associated with the sewer connections would be subject to review and approval by the Redondo Beach Department of Public Works. All appropriate permits (e.g., public right-of-way permits associated with connections to off-site sewer system) would be obtained, as necessary. The construction contractor would be required to notify Redondo Beach Department of Public Works in advance of ground disturbance activities to existing avoid disruption of sewer service to off-site properties. Compliance with all required permit requirements required by the Redondo Beach Department of Public Works would ensure that temporary impacts on sewer capacity and wastewater infrastructure during construction activities would be *less than significant.*

*Operation*

The Sewer Capacity Study prepared for the proposed Project determined that the existing buildings on the Project site generate a peak daily demand of 68,925 gpd, which flows into the 8-inch local sewer main in North Prospect Avenue and away from the Project site to the southeast (John Labib & Associates 2020b). The existing sewer main capacity is 668,593 gpd (John Labib & Associates 2020b). The existing uses at the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) and Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) would remain, and would continue to generate a combined average of approximately 24,925 gpd (refer to Table 3.15-10).

Phase 1 of the proposed Project would decrease wastewater generation at the Project site compared to existing conditions. Using wastewater generation factors from the City of Los Angeles CEQA Thresholds Guide (2006), John Labib & Associates (2020) determined~~,~~ the projected daily peak demand during Phase 1 would be approximately 62,606 gpd (see Table 3.15-11). Therefore, the implementation of Phase 1 of the proposed Project would decrease existing wastewater generation by approximately 6,319 gpd.

**Table 3.15-11. Projected Wastewater Generation for Phase 1 of the Proposed Project**

| Proposed Use | Wastewater Generation Factor | Size | Peak Daily Wastewater Generation (gpd) |
|---|---|---|---|
| ***Assisted Living*** | | | |
| Studio Unit | 80 gpd per DU | 37 units | 2,960 |
| Single-Bedroom Unit | 120 gpd per DU | 100 units | 12,000 |
| Two-Bedroom Unit | 160 gpd per DU | 20 units | 3,200 |
| Lobbies/Lounges | 80 gpd per 1,000 sf | 84,000 sf | 6,720 |
| ***Memory Care*** | | | |
| Two-Bedroom Unit | 160 gpd per DU | 60 units | 9,600 |
| Lobbies/Lounges | 80 gpd per 1,000 sf | 24,500 sf | 1,960 |
| ***PACE Medical Care Service*** | | | |
| Medical Office | 250 gpd per 1,000 sf | 14,000 sf | 3,500 |
| ***Community Services*** | | | |
| Office | 150 gpd per 1,000 sf | 6,270 sf | 941 |
| 510 and 520 North Prospect Avenue to remain (refer to Table 3.15-10) | | | 24,925 |
| Average Daily Demand | | | 62,606 |

Notes: DU = dwelling unit
Wastewater Generation Factors are based on sewer flow estimates for each use from Exhibit M.2-22 of the *Los Angeles CEQA Thresholds Guide (2006)*.
Source: John Labib & Associates 2020b; see Appendix L.

The implementation of Phase 2 of the proposed Project would increase wastewater generation at the Project site compared to Phase 1 and existing conditions~~,~~. Using wastewater generation factors from the City of Los Angeles CEQA Thresholds Guide (2006), the projected daily peak demand of the Phase 2 would be approximately 116,286 gpd (see Table 3.15-12). Therefore, Phase 2 of the proposed Project would increase the amount of wastewater currently transported by the sewer system by approximately 47,361 gpd from existing conditions.

Sewer lines have a flow capacity based on the diameter and slope of the pipe. To ensure that wastewater flows would be adequately accommodated, sewer lines are reviewed based on the guidelines for sewer design and operations from the Los Angeles Bureau of Engineering Manual – Part F. According to this guidance, sewer lines should be sized so the depth of the Peak Dry Weather Flow (PDWF), projected for the design period, shall be no more than 50 percent of the pipe diameter (d/D = 0.5 where d = depth of flow and D = pipe diameter). This design screening criterion of d/D = 0.5 for both PDWF and Peak Wet Weather Flow (PWWF) is used to assess whether future upgrades are needed to the City sewer system.

**Table 3.15-12. Projected Wastewater Generation for Phase 2 of the Proposed Project**

| Proposed Use | Wastewater Generation Factor | Size | Peak Daily Wastewater Generation (gpd) |
|---|---|---|---|
| ***Wellness Pavilion*** | | | |
| Lobbies/Lounges | 80 gpd per 1,000 sf | 12,863 sf | 1,029 |
| Restaurant | 30 gpd per seat | 290 seats | 8,700 |
| Office | 150 gpd per 1,000 sf | 7,077 sf | 1,062 |
| Library | 80 gpd per 1,000 sf | 5,000 sf | 400 |
| ***Aquatic Center*** | | | |
| Health Club/Spa | 800 gpd per 1,000 sf | 27,015 sf | 21,612 |
| Lobbies/Lounges | 80 gpd per 1,000 sf | 500 sf | 40 |
| Office | 150 gpd per 1,000 sf | 1,813 sf | 272 |
| ***Center for Health and Fitness*** | | | |
| Health Club/Spa | 800 gpd per 1,000 sf | 20,000 sf | 16,000 |
| ***Youth Wellness Center*** | | | |
| Office | 150 gpd per 1,000 sf | 9,100 sf | 1,365 |
| Phase 1 Average Daily Demand (refer to Table 3.15-11) | | | 37,681 |
| 510 and 520 North Prospect Avenue to remain (refer to Table 3.15-10) | | | 24,925 |
| Daily Demand | | | 116,286 |

Notes: Wastewater Generation Factors are based on sewer flow estimates for each use from Exhibit M.2-22 of the City of Los Angeles CEQA Thresholds Guide (2006).
Due to the programmatic nature of the Phase 2 development program, the provided water use factors for the Aquatics Center represent estimates based on similar uses. Health Club/Spa represent fitness centers that have both fitness equipment as well as indoor and outdoor pools.
Source: John Labib & Associates 2020b; see Appendix L.

The Sewer Capacity Study prepared by John Labib & Associates (2020b) analyzed the capacity of the 8-inch local main along Diamond Street to convey the increased wastewater flow associated with the proposed Project. The Sewer Capacity Study concluded, after calculating the proposed sewer flow, the existing 8-inch sewer line along Diamond Street would adequately accommodate the proposed sewer flow without upgrades. As shown in Table 3.15-13, under the proposed peak flows would increase from 68,925 gpd to 116,285 gpd, representing net change of 47,361 or 69 percent increase from existing conditions. However, even with the increase in sewage flow associated with the proposed Project, proposed flows would remain below a 50 percent flow depth to diameter ratio. Therefore, the proposed Project and would not exceed existing infrastructure capacity (John Labib & Associates 2020b). .

**Table 3.15-13. Wastewater Conveyance for the Proposed Project**

| | Peak Flow (gpd) |
|---|---|
| Existing | 68,925 |
| Proposed | 116,286 |
| Net Change | 47,361 |
| Existing Sewer Capacity | 2,100,000 |

Source: John Labib & Associates 2020b; see Appendix L.

The proposed Project wastewater would continue to flow from the local sewer line along Diamond Street to the LACSD South Bay Cities Main Trunk Sewer, located in Gertruda Avenue at Catalina Avenue. The LACSD's 20-inch diameter lined trunk sewer has a capacity of 2.4 mgd and conveyed a peak flow of 0.3 mgd when last measured in 2015 (LACSD 2020b). As such, the LACSD main trunk sewer has a remaining sewer capacity of approximately 2.1 mgd and the increase in sewage flow of 0.047 mgd associated with the proposed Project would not exceed the LACSD sewer capacity. Therefore, implementation of the proposed Project would result in a *less than significant* impact on existing wastewater infrastructure.

Impact Description (UT-4)

*b) The project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

**UT-4 Implementation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in an overall increase in wastewater generation at the Project site; however, the proposed Project would not result in an exceedance of the Joint Water Pollution Control Plant's (JWPCP's) wastewater treatment capacity. Impacts would be *less than significant*.**

As described in Section 3.15.2.1, *Environmental Setting – Wastewater Collection, Conveyance, and Treatment* wastewater is collected through the City of Redondo Beach's sewer system, flows into the LACSD interceptors, and is conveyed to the JWPCP. The JWPCP receives approximately 261.1 mgd of wastewater, and has a maximum capacity of approximately 400 mgd processed through full secondary treatment (LACSD 2015, 2020a). As described in Impact UT-3, the proposed Project would generate an increase in the average daily amount of wastewater by approximately 47,361 gpd during the implementation of Phase 2 (refer to Table 3.15-12). Given that the JWPCP has approximately 139 mgd of additional capacity, the increased wastewater flow

from the operation of the proposed Project would be less than 1 percent of the remaining capacity of the JWPCP. As a result, the JWPCP would have sufficient capacity to accommodate the increased wastewater generated by the proposed Project and would not require any upgrades to increase capacity due to the proposed Project. Therefore, impacts related to wastewater treatment capacity would be *less than significant*.

Cumulative Impacts – Wastewater Collection, Conveyance, and Treatment

A cumulative impact related to wastewater infrastructure would result if the potential impacts associated with the proposed Project, when combined with other past, present, and future projects (refer to Table 3.0-1), would require construction of new or expanded wastewater infrastructure, the construction of which would cause significant environmental effects or if there is inadequate capacity to serve the projected demand in addition to the wastewater treatment provider's existing commitments.

*Wastewater Conveyance System*

As described in Impact UT-3, the implementation of the proposed Project would result in a minor increase to the existing wastewater flows in the 8-inch sewer main and gravity main along Diamond Street (refer to Table 3.15-11 and Table 3.15-12). This increase in wastewater flow from the proposed Project would result in a maximum flow of approximately 1.59 inches, which is well below the current capacity of the line (see Appendix L).

Wastewater flows from the Project site would flow to Diamond Street for conveyance to LACSD's South Bay Cities Main Trunk Sewer, located in Gertruda Avenue at Catalina Avenue. As with all wastewater in the City of Redondo Beach, the wastewater flows from the Project site would be conveyed to the JWPCP. Cumulative projects within the cities of Redondo Beach, Torrance, and Hermosa Beach could create additional wastewater flows. Cumulative development may necessitate future upgrades to maintain adequate service capacity for existing and future development within Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach. However, required development fees for the proposed Project would support improvements and upgrades to capital facilities needed to maintain wastewater conveyance systems to an adequate service capacity. Construction of new sewer lines would require excavation, removal of older mains, removal of existing manholes, and installation of the new manholes and lines located within existing paved roads and public rights-of-way. This would involve typical short-term construction impacts, such as air emissions, noise, and disruption of pedestrian, bicycle, and vehicle traffic flows. However, as with the proposed Project, individual projects would be subject to City review

and approval, including environmental review to ensure that replacement or construction of new sewer mains would be mitigated to a less than significant level, as necessary.

The proposed Project's contribution to cumulative wastewater generation demand would be incremental in comparison to existing and future planned wastewater capacities of local wastewater treatment providers. Compliance of the proposed Project and future development projects with regulatory requirements that regulate wastewater discharge, such as the Los Angeles County Wastewater Ordinance, Los Angeles RWQCB wastewater treatment requirements, and local municipal codes would assist in ensuring that wastewater generation is minimized and wastewater demand is adequately served on a cumulative basis. If cumulative development projects exceed the capacity of the wastewater infrastructure, developers would be required to reduce water consumption and wastewater flow on a project-specific basis, including implementation of BMPs for water conservation and efficiency. Therefore, capacity of wastewater conveyance systems would be maintained and the proposed Project would not have a considerable cumulative impact on regional wastewater treatment.

*Wastewater Treatment*

LACSD manages the JWPCP, which serves Redondo Beach and portions of the greater Los Angeles area. LACSD's Clearwater Program Master Facilities Plan addresses wastewater disposal in the service area, including Redondo Beach, through the year 2050. The JWPCP facility provides primary and secondary treatment for approximately 261.1 mgd, and has a total permitted capacity of 400 mgd (LACSD 2015, 2020a). Based on current long-term estimates of population density and sewer demand, projected average annual wastewater flows for the JWPCP are 359 mgd in 2050 (LACSD 2012). Therefore, the proposed Project's estimated generation of 0.1 mgd (116,286 gpd) (including the existing uses at 510 and 520 North Prospect Avenue) would not have a considerable contribution to cumulative impacts on regional wastewater treatment.

### 3.15.3 Solid Waste Management Services

#### 3.15.3.1 Environmental Setting – Solid Waste Management Services

<u>Solid Waste Management System</u>

Solid waste services for Redondo Beach and the Project site are provided under an exclusive franchise agreement with Athens Services, a commercial vendor providing solid waste haul and disposal service throughout Southern California (City of Redondo Beach 2020b). Athens Services provides residential and commercial solid waste collection and recycling services throughout

Redondo Beach and manages several Materials Recovery Facilities (MRFs) located in the Los Angeles County area.

Pursuant to its contract with the City of Redondo Beach, Athens Services is required to collect refuse, recyclables, and organics throughout the City through expanded recycling programs and curbside compost collection. Solid waste collected from all residential uses in Redondo Beach is disposed of at the Southeast Resource Recovery Facility. Solid waste collected from commercial and municipal uses in the Redondo Beach is hauled to one of Athens Services MRFs located in either the City of Industry or Sun Valley, where it is sorted and recycled. Solid waste is sorted and recycled at these facilities to ensure compliance with the State mandated 75 percent waste diversion rate under Assembly Bill (AB) 341 as well as the City of Redondo Beach's 75 percent diversion contract with Athens Services. Green waste is transported to American Organics in Victorville. Once sorted, solid waste materials that are not able to be recycled are transported to either the Chiquita Canyon Landfill or San Timoteo Landfill (see Table 3.15-14).

**Table 3.15-14. City of Redondo Beach Disposal and Estimated Remaining Disposal Capacity (tons)**

| Landfill | 2018 City Disposal | | Permitted Daily Capacity (tpd) | Additional Remaining Capacity (tons)* | Remaining Life (years) |
|---|---|---|---|---|---|
| | Tons Per Day | Tons Per Year | | | |
| Chiquita Canyon Landfill | 0.73 | 268 | 6,000 | 12,001,395 | 39 |
| Mid Valley Sanitary Landfill | 26.23 | 9,575 | 7,500 | 37,000,000 | 14 |
| San Timoteo Sanitary Landfill | 9.77 | 3,565 | 2,000 | 7,000,000 | 24 |
| Victorville Sanitary Landfill | 0.74 | 270 | 3,000 | 55,061,069 | 29 |
| Southeast Resources Recovery Facility | 53 | 16,390 | 2,240 | N/A | N/A |
| **Total** | **90.47** | **29,800** | **20,740** | **111,062,464** | **N/A** |

Notes: *As of December 31, 2018. Permitted daily capacity and additional remaining capacity for the Victorville Sanitary Landfill are from December 31, 2016 and therefore may be slightly inflated.
Source: Jesse Reyes 2020; County of Los Angeles Department of Public Works 2019; County of San Bernardino 2018.

Los Angeles County periodically evaluates demand for landfill capacity through the preparation of the County Integrated Waste Management Plan Annual Reports. Of the 10 Class III landfills that serve Los Angeles County, the following four landfills serve the City of Redondo Beach: Chiquita Canyon, Mid Valley, San Timoteo, and Victorville landfills.[3] These landfills have a combined remaining capacity of approximately 111,062,464 tons (refer to Table 3.15-14; County of Los Angeles Department of Public Works 2019; County of San Bernardino 2018). Mid Valley

[3] Class III landfills are landfills that are permitted to accept non-hazardous municipal solid wastes.

Landfill serves the City of Redondo Beach's waste disposal needs more than any other Class III landfill, and has a remaining disposal capacity of approximately 37,000,000 tons.

*Construction and Demolition Waste*

Construction and demolition (C&D) debris is generated when new structures are built and existing structures and hardscape are renovated or demolished, and results in the generation of solid waste. C&D can be composed of various materials, including concrete, asphalt, brick, glass, wood, metals, gypsum wallboard, and roofing. Materials that comprise C&D debris may also include land clearing debris, trees, stumps, soil, and rock from clearing construction sites. Construction waste typically consists of trim scraps of construction materials associated with the construction of new buildings and roadways such as wood sheetrock, masonry, and roofing materials.

C&D debris is typically disposed of at inert landfills instead of sanitary landfills, due to lower disposal costs or tipping fees. According to the County of Los Angeles Integrated Waste Management Plan 2018 Annual Report, the Azusa Land Reclamation Facility is the only permitted inert waste landfill in Los Angeles County that has a full solid waste permit. The remaining capacity of this landfill is 57.72 million tons or 46.17 million cubic yards (cy) as of the end of 2018 (County of Los Angeles Department of Public Works 2019). Given the permitted remaining capacity rate of 1,148 tons per day (tpd) in 2018, it is estimated that this capacity would be exhausted in 2046 (County of Los Angeles Department of Public Works 2019). Victorville Landfill in San Bernardino County, which serves the City of Redondo Beach, also accepts inert debris and has a remaining capacity of 55,061,069 tons as of the end of 2016 (County of San Bernardino 2018).

*Project Site*

Solid waste currently generated at the Project site includes waste associated with the Advanced Imaging Building (i.e., 510 North Prospect Avenue), Beach Cities Health Center (i.e., 514 North Prospect Avenue), and Providence Little Company of Mary Medical Institute Building (i.e., 520 North Prospect Avenue), including medical and office uses, such as medical supplies, food and beverage containers, paper products, and other miscellaneous trash. Solid waste generation was estimated based on the existing number of Memory Care residential units and employees for each land use type. The Project site currently generates approximately 330.22 tons of solid waste per year (Table 3.15-15). Based on the City of Redondo Beach's current diversion rate of 75 percent, approximately 247.67 tons of solid waste generated at the Project site per year are diverted from landfills by recycling or composting, and approximately 82.56 tons of solid waste per year are sent to landfills.

**Table 3.15-15. Existing Solid Waste Generation at the Project Site**

| Existing Uses | | Size | Solid Waste Generation Rate | Solid Waste (tons/year) |
|---|---|---|---|---|
| Providence Little Company of Mary Medical Institute Building | Medical and Health | 18 employees | 0.74 tons/employee/year | 13.32 |
| Beach Cities Advanced Imaging Building | Medical and Health | 8 employees | 0.74 tons/employee/year | 5.92 |
| Beach Cities Health Center | Medical and Health | 75 employees | 0.74 tons/employee/year | 55.5 |
| | Services | 88 employees | 2.31 tons/employee/year | 203.28 |
| | Memory Care | 60 units | 0.87 tons/unit/year | 52.2 |
| **Total** | | | | **330.22** |

Notes: Service/administrative uses were combined and waste generation rates were calculated using the most conservative Services generation rate of 2.31 tons/employee/year.
Number of employees represent estimates based on responses from Tenant Surveys created and distributed to Office Managers in support of the proposed Project.
Source: CalRecycle 2015.

### 3.15.3.2 Regulatory Setting – Solid Waste Management Services

State Policies and Regulations

*California Integrated Waste Management Act*

The California Integrated Waste Management Act (CIWMA) of 1989 (AB 939; California Public Resources Code, Section 40000 *et seq.*) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board and local agencies in implementation, in order of priority: 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. The Act required each county to establish a task force to coordinate the development of countywide siting elements and citywide Source Reduction and Recycling Elements (SRREs). The Act also required each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan.

*Senate Bill 1016*

SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing the measurement of waste reduction from a diversion rate to a disposal-based indicator – the per capita disposal rate. The purpose of the per capita disposal measurement system is to make the process of goal measurement as established by AB 939 simpler, timelier, and more accurate. Beginning with reporting year 2007 jurisdiction annual reports, diversion rates will no longer be measured. With the passage of SB 1016, only per capita disposal rates are measured. For 2007 and subsequent years, CalRecycle

compares reported disposal tons to population to calculate per capita disposal expressed in pounds/person/day.

*Short Lived Climate Pollutants Bill of 2016 (Senate Bill 1383)*

SB 1383 requires the California Air Resources Board (CARB) to approve and begin implementing a comprehensive strategy no later than January 1, 2018 to reduce emissions of short lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. It also establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle, in consultation with CARB, is responsible for implementation of regulations to achieve these targets. SB 1383 authorizes local jurisdictions to charge and collect fees to recover the local jurisdiction's costs incurred in complying with the regulations. It also requires CalRecycle, in consultation with CARB, to analyze the progress that the waste sector, State government, and local governments have made in achieving the specified targets for reducing organic waste in landfills no later than July 1, 2020. Depending on the outcome of that analysis, CalRecycle is authorized to amend the regulations to include incentives or additional requirements.

*Assembly Bill 341*

AB 341 established a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020. Additionally, this law required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 builds on the existing AB 939 requirement that every jurisdiction divert at least 50 percent of its waste. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012. AB 341 requires any business (including schools and government facilities) that generates 4 cy or more of waste per week, and multifamily buildings with five or more units to arrange for recycling services.

City of Redondo Beach Local Policies and Regulations

*Redondo Beach General Plan Solid Waste Management and Recycling Element*

Objective 7.2: Increase the range and amount of solid waste that is recycled throughout the community, in accordance with all applicable state and local requirements, while achieving the resultant environmental and financial benefits and advantages of such activities.

Policy 7.2.3 The City of Redondo Beach (principally through the Department of Public Works) shall continue to encourage, support, and monitor the efforts and activities of the City's Environmental and Utilities Commission relative to integrated waste management activities. This body was appointed by the City Council to develop and implement the City of Redondo Beach Solid Waste Management Plan, as mandated by the State Legislature in Assembly Bill 939.

Policy 7.2.4 In the interim, the City should continue to proactively encourage, engender, and monitor its existing *"curbside"* recycling plan, neighborhood and group recycling plans and efforts, recycling by larger property owners and commercial and industrial businesses to increase the amount of participation and range of materials that are presently being recycled.

Policy 7.2.5 The City of Redondo Beach shall, as feasible and appropriate, require that all new or remodeled multi-family residential, commercial, and industrial developments develop and submit a formal *"recycling plan,"* designating where and through which means materials will be stored for recycling purposes. The City Department of Public Works shall assist the City Community Development Department in reviewing these plans.

*Redondo Beach Municipal Code*

The RBMC includes several provisions regarding the city's solid waste generation and disposal.

Section 5-2.704 – Submission of a Hazardous Waste Management Plan. Requires an applicant for a demolition permit to submit a waste management plan for City approval. The waste management plan must show that at least 50

percent of all construction and demolition material generated by the project will be diverted or that an exemption has been approved. Of the 50 percent diversion rate, no more than 25 percent can be achieved through the recycling or reuse of inert materials unless the applicant can demonstrate that there are not sufficient structural materials for recycling or that a 25 percent diversion of total waste through non-inert materials is not feasible.

Section 9-12.502 – Standards for Utilities. Requires all new and replacement water supply and sanitary sewage systems be designed and located to avoid or eliminate impairment or contamination to onsite waste disposal systems during flooding.

### 3.15.3.3 Impact Assessment Methodology – Solid Waste Management Services

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on solid waste if:

a) The project would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or

b) The project would not comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

Methodology

The proposed Project was evaluated for impacts to solid waste facilities based on data published in the County of Los Angeles Countywide Integrated Waste Management Plan 2018 Annual Report and personal communication with the Redondo Beach Department of Public Works and Athens Services. Based on these sources, this analysis assesses the existing capacity of landfills that serve Athens Services and the City of Redondo Beach, any planned improvements to or changes to landfill capacity and projected increases in solid waste generation associated with land use changes anticipated to occur by 2030.

Impacts to solid waste disposal would be considered a significant impact if solid waste generated by the proposed Project exceeds the capacity of landfills and other solid waste facilities where

such waste would be disposed or if the proposed Project would adversely affect the achievement of State or local diversion requirements.

3.15.3.4 Project Impacts and Mitigation Measures – Solid Waste Management Services

Impact Description (UT-5)

*a) The project would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.*

**UT-5 The implementation of the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not result in the generation of solid waste during construction or operation that would exceed the existing capacity of existing landfills serving Redondo Beach. Therefore, impacts would be *less than significant.***

*Construction*

As described in Section 2.5.1.6, *Construction Activities,* the proposed Project would involve the demolition of the existing Beach Cities Health Center and northern surface parking lot during Phase 1 construction and the existing above ground parking garage and Phase 1 parking lot during Phase 2 construction. These demolition activities would result in the generation of substantial amounts of concrete and asphalt as well as other debris including structural steel, wood, glass, flooring, and utility material such as pipes and cables. The proposed construction activities would generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The proposed Project would comply with the Redondo ~~BeaConstruction~~Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during construction and demolition from landfills. The construction and demolition waste would be delivered to certified construction and demolition waste processors within the region where it would be recycled, as feasible. The Countywide Integrated Waste Management Plan 2018 Annual Report concludes that there is current capacity of 57.72 million tons or 46.17 million cy available throughout the County for the disposal of inert waste. Additionally, the City of Redondo Beach is served by Victorville Sanitary Landfill in San Bernardino County, which also receives construction and demolition debris waste and has a current capacity of 55,061,069 tons as of the end of 2016 (County of San Bernardino 2018). The C&D waste associated with the proposed Project, including

approximately 65,250 tons of demolition debris (e.g., asphalt and construction) would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, the proposed Project would not create a need for additional solid waste disposal facilities to adequately handle Project construction-generated inert waste and impacts would be *less than significant.*

*Operations*

The proposed Project would generate municipal solid waste that would be typical of those generated by a mixed-use project. The proposed Project would result in a minor increase in municipal solid waste generation relative to existing conditions. To determine if there would be sufficient landfill capacity to accommodate solid waste generated by the proposed Project, solid waste generation was estimated based on the number of residential units and projected employees for each land use type. The estimated ~~potential increase in~~ solid waste generation under the proposed Project is approximately 663.1 tons per year (see Table 3.15-16) (CalRecycle 2015). Assuming the existing Athens Services diversion rate of 75 percent, this would result in up to 497.38 tons per year of waste that would need to be disposed in one or both landfills serving the City of Redondo Beach.

**Table 3.15-16. Estimated Solid Waste Generated by the Proposed Project**

| Proposed Uses | Size | Solid Waste Generation Rate | Solid Waste (tons/year) |
|---|---|---|---|
| Assisted Living and Memory Care | 217 units | 0.87 tons/unit/year | 188.8 |
| Caregiver and Medical Technicians | 53 employees | 2.92 tons/employee/year | 154.7 |
| Services | 108 employees | 2.31 tons/employee/year | 249.5 |
| Restaurant | 24 employees | 2.92 tons/employee/year | 70.1 |
| **Total** | | | **663.1** |

Notes: Service/administrative uses were combined and waste generation rates were calculated using the most conservative Services generation rate of 2.31 tons/employee/year. Management, Administrative, support, and social services uses generate 1.44 tons/employee/year of solid waste.
Source: CalRecycle 2015.

As described in Section 3.15.3.1, *Environmental Setting – Solid Waste Management Services*, five solid waste disposal facilities currently serve the Redondo Beach, including four landfills and one refuse-to-energy facilities (refer to Table 3.15-14). The combined remaining capacity of the landfills is 111,062,464 tons (refer to Table 3.15-14; (County of Los Angeles Department of Public Works 2019; County of San Bernardino 2018). The combined maximum permitted daily capacity of these facilities is 20,740 tons, although only 10,013 tons are disposed in these facilities daily (48 percent of capacity). Therefore, the projected 663.1 tons per year of solid waste (approximately 1.8 tpd) would constitute 1 percent of the capacity of existing solid waste facilities, would therefore not exceed the existing capacity of solid waste facilities.

As explained above, the City of Redondo Beach has achieved significant waste reduction targets and strives for additional reductions in solid waste. Through its contract with Athens Services, the City of Redondo Beach has achieved a diversion rate of 75 percent. Under the proposed Project, the City of Redondo Beach would continue to implement to waste diversion strategies, thereby reducing expected waste generation from the proposed Project. Given the existing sufficient capacity of solid waste facilities and the City of Redondo Beach's continued efforts to reduce waste generation, this impact would be *less than significant*.

Impact Description (UT-6)

*b) The project would not comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.*

**UT-6 The proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would not result in generation of solid waste that would conflict with Federal, State, and local statutes and regulations related to solid waste. Due to existing local programs implementing State laws for diversion, would be *no impact*.**

As described in Impact U-5, the proposed Project would not conflict with the goals or requirements of AB 939, AB 341, Redondo Beach General Plan Solid Waste Management and Recycling Element, or the RBMC. As discussed in UT-5, the City of Redondo Beach has already achieved a diversion rate of 75 percent through its contract with Athens Services that is in excess of the requirements of AB 939 and AB 341 to achieve a 50 percent diversion by 2020. The City of Redondo Beach remains committed to continuing its existing waste reduction programs and minimization efforts, including curbside recycling, multi-family centralized recycling and commercial recycling, school recycling programs, and backyard and worm composting.

BCHD would comply with the Construction and Demolition Ordinance (RBMC Section 5-2.704) by submitting a waste management plan to the City of Redondo Beach and diverting at least 50 percent of construction and demolition debris from landfills. Additionally, proposed Project operations would include recyclable containers/bins that would be provided on-site to ensure that solid waste associated with the proposed Project would be recycled or reused to the greatest extent possible. Therefore, the proposed Project would comply with applicable State and local statutes and regulations related to solid waste, and there would be *no impact*.

Cumulative Impacts – Solid Waste Management Services

The operation of the proposed Project would contribute to cumulative solid waste generation that is sent to regional landfills and solid waste disposal facilities associated with future growth within the City of Redondo Beach and the region. As shown in Table 3.15-14, the combined maximum solid waste accepted daily throughput of the two solid waste facilities serving the City of Redondo Beach is 8,000 tons of solid waste per day, while the average daily amount disposed is 5,466 tons per day, resulting in an excess daily capacity of 2,534 tons of solid waste per day (refer to Table 3.15-14).

The projected 663.1 tons per year of solid waste (approximately 1.8 tpd) that would be generated following the completion of the proposed Project would represent a negligible increase, less than 1 percent, of the total daily permitted capacity of the two solid waste facilities that to serve the City of Redondo Beach, and would not contribute to a cumulative increase in waste disposal that would exceed the capacity of a landfill. Therefore, this additional waste would not result in a considerable contribution to cumulative impacts associated with landfill capacity. Additionally, the County periodically addresses landfill capacity through the preparation of Annual Reports. The preparation of each Annual Report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Compliance of the proposed Project and future development projects with findings and recommendations of these annual reports and regulatory requirements that promote diversion of solid waste, such as the California Integrated Waste Management Act, would also assist in ensuring that solid waste facilities have adequate capacity to serve solid waste generation on a cumulative basis. Therefore, the proposed Project *would not result in a substantial contribution to cumulative impacts* on solid waste facilities.

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# 4.0 OTHER CEQA CONSIDERATIONS

This section of the Environmental Impact Report (EIR) presents the evaluation of additional environmental impacts analyses required by the California Environmental Quality Act (CEQA) that are not discussed in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, including significant unavoidable effects, significant irreversible environmental changes, growth-inducing impacts (including removal of obstacles to growth), and environmental resource areas that would experience negligible or no environmental impacts. CEQA Guidelines Section 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation.

## 4.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. Where there are significant impacts, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Noise

All phases of construction associated with the proposed Project would involve the use of heavy construction equipment (e.g., cranes, bulldozers, excavators, etc.). Demolition and excavation would involve the use of haul trucks, and construction of the proposed buildings during Phase 1 and Phase 2 would require extensive concrete pours requiring additional truck trips. Construction activities would produce increased noise levels that would impact surrounding noise-sensitive receptors. Mitigation Measure (MM) NOI-1 would require the implementation of noise attenuation measures, including the use of noise barriers (i.e., sound walls) or noise blankets (i.e., sound absorbing materials). Compliance with existing local noise regulations along with the implementation of MM NOI-1 would reduce potential noise impacts. However, given the maximum roof heights of the proposed Residential Care for the Elderly (RCFE) Building (i.e., 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below) and other proposed building(s) under the Phase 2 development program (i.e., up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below), construction of noise barriers to a height necessary to break the line of sight from surrounding sensitive receptors would be infeasible. Therefore, *significant and unavoidable* noise impacts would occur for the duration of construction of both phases of the proposed Project.

## 4.2 REASONS THE PROJECT IS BEING PROPOSED NOTWITHSTANDING ITS SIGNIFICANT AND UNAVOIDABLE IMPACTS

In addition to identification of the significant and unavoidable impacts associated with the proposed Project, CEQA Guidelines Section 15126.2(c) requires a description of the reasons why a project is being proposed, notwithstanding significant and unavoidable impacts.

As previously described in Section 4.1, *Significant and Unavoidable Effects*, the proposed Project would result in significant and unavoidable off-site construction-related noise impacts. Compliance with existing local noise regulations along with the implementation of MM NOI-1 would reduce potential construction noise impacts; however, given the maximum roof heights of the proposed buildings of up to 103 feet above the existing campus ground level and 133.5 feet above the vacant Flagler Lot. The necessary noise barrier heights required to mitigate the noise from construction activities above 30 feet are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Compliance with existing local noise regulations along with the implementation of MM NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. However, *significant and unavoidable* noise impacts would occur throughout the duration of the proposed construction activities.

These construction-related noise impacts would occur within the hours permitted by the Redondo Beach Municipal Code (RBMC) Section 4-24 and the Torrance Municipal Code (TMC) 6-46. While construction related noise would exceed the Federal Transit Administration (FTA) noise thresholds, neither the RBMC nor the TMC set quantitative noise limits on construction equipment during these hours.

Notwithstanding the significant impacts associated with construction-related noise impacts, the proposed Project has been proposed by BCHD to achieve the objectives described in Section 2.4, *Project Objectives*. The proposed Project would address escalating building maintenance costs associated with the former South Bay Hospital Building (i.e., 514 North Prospect Avenue). These costs are anticipated to exceed the annual operational revenue of BCHD within the next 2 to 3 years and create an operational deficit if left unresolved. Additionally, the South Bay Hospital is over 60 years old, does not meet the current seismic requirements of the California Building Code (CBC), and presents a public safety hazard (Nabih Youssef and Associates Structural Engineers 2018). The proposed Project would provide a long-term solution to seismic safety hazards through the demolition and replacement of the South Bay Hospital (and Beach Cities Health Center) with new facilities that comply with the latest State and local building code standards and are capable of withstanding lateral ground movement from an earthquake.

## 4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) requires a discussion of "*significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified*."

Development of the proposed Project would result in the irreversible alteration of the built environment and the irreversible consumption of limited amounts of slowly renewable resources and non-renewable resources due to construction and operation. Construction associated with the proposed Project would involve the consumption of building materials and energy, including lumber and other forest products; raw materials such as steel; aggregate materials used in concrete and asphalt, such as sand and stone; water; petrochemical construction materials, such as plastic; and petroleum-based construction materials. In addition, fossil fuels would be consumed for construction of the proposed Project. The consumption of limited slowly renewable resources and nonrenewable resources would continue throughout the operational lifetime of the proposed Project because the proposed 157 Assisted Living units, 14,000 sf of space for PACE services, 6,270 sf of Community Services space, 37,150 sf of Wellness Pavilion space, 31,300 sf Aquatic Center, and 20,000 sf of Center for Health and Fitness would require resources such as water, petroleum, and natural gas.

Although the proposed Project would necessarily result in the consumption of such resources, the proposed Project would contribute to a land use pattern that would promote an overall reduction in resource consumption per capita. The proposed Project would provide a mix of compatible uses to activate the proposed pedestrian pathways and encourage walking by future residents, employees, and patrons of the site. The compatible mix of uses would also encourage campus visitors to participate in several programs at the Project site, which would reduce vehicle miles traveled (VMT). In addition, bicycle amenities would include lockers and showers for commercial employees who bike to work, ground level short-term visitor bicycle parking, long-term parking for employees, secured parking for residents, and residential elevators to facilitate convenient transport of bicycles within the Project site.

As required by the RBMC and the TMC, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11), and the Torrance Water Conservation and Water Supply Shortage and Sustainability Program requirements. Additionally, the proposed buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification and would be WELL Building Certified. The proposed Project would include a variety of conservation features, which would be finalized in a final design plans, including photovoltaic solar panels, solar hot water systems, and other renewable energy resources; LED lighting; solar swimming pool heating; retention and potential reuse of on-site stormwater pollution; and water efficiency features. The proposed Project would reduce waste with on-site recycling containers to support the City of Redondo Beach's recycling efforts. The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; electric vehicle (EV) charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. The proposed Project would also implement a transportation demand management (TDM) plan with trip reduction strategies, such as transit and carpool incentives for employees, to reduce single-occupancy vehicle trips to the Project site (refer to Section 3.14, *Transportation*). These additional sustainability features would further reduce new energy demand and the consumption of water and non-renewable fossil fuels.

Consumption of these resources would be relatively small in scale in comparison to the region and are not unique to the Project. Further, the consumption of resources would be consistent with regional and local growth forecasts in the area, and would occur in accordance with State and local goals and requirements. Additionally, because the Project site does not contain these resources, the Project would not directly impact or interrupt the production or delivery of such resources. The Project's irreversible changes to the environment would be *less than significant*.

## 4.4 GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(e) requires a discussion of ways in which a project could foster economic or population growth, either directly or indirectly, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A project may induce growth if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to population growth, taxes community service facilities to the extent that the construction of new facilities would be necessary, or encourages or facilitates other

activities that cause significant environmental effects. In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project results in the urbanization of land in a remote location (leapfrog development)
- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth inducing projects are in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encouraging premature or unplanned growth. However, in urban areas, growth inducing projects typically involve proposed plans or policies that alleviate barriers to growth or increase opportunities for development.

To comply with CEQA, an EIR must discuss the ways in which the proposed project could promote economic or population growth near the project area and how that growth would, in turn, affect the surrounding environment. Under CEQA, this growth is not to be considered "*necessarily detrimental, beneficial, or of little significance to the environment*" (CEQA Guidelines Section 15126.2[e]). Induced growth is considered a significant impact only if it affects (directly or indirectly) the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

<u>Population, Employment, and Housing Growth</u>

The proposed Project would develop 217 residential units, including replacement of 60 existing Memory Care units and development of 157 new Assisted Living units. The proposed Project is anticipated to increase the population within the Cities by approximately 177 residents (refer to Section 3.12, *Population and Housing*). Relative to the populations of Redondo Beach and Torrance, the expected net increase in residential population resulting from the proposed Project would be less than 1 percent and would not be considered substantially growth inducing (U.S. Census Bureau 2017).

The provision of new Assisted Living units is a primary objective of the proposed Project, consistent with the goals and policies within the Redondo Beach General Plan Housing Element

to promote new housing which meets the needs of seniors and the disabled such as Policies 3.1, 3.4, 3.5, and 5.2, (refer to Section 3.10, *Land Use and Planning* and Section 3.12, *Population and Housing*).

The proposed Project would generate short-term employment opportunities during construction, which would draw workers from the existing regional work force. Additionally, Phase 1 and Phase 2 of the proposed Project are expected to employ approximately 170 full-time equivalent employees. The proposed Project is expected to draw most workers from the existing regional workforce. Therefore, the proposed Project would not be considered growth inducing because it would not substantially affect long-term employment opportunities or require the construction of additional housing stock.

Potential impacts associated with population, employment, and housing anticipated to result from implementation of the proposed Project are further addressed in Section 4.4, *Effects Found Not to Be Significant*.

### 4.4.1 Removal of Obstacles to Growth

The proposed Project would be located within an urbanized area, which is well-served by existing infrastructure including streets, water system, sewer system, and electricity/natural gas service. Because the proposed Project constitutes redevelopment of a currently developed site within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, Project implementation would not remove an obstacle to growth.

The proposed Project would implement the policies of the Housing Elements of the Redondo Beach General Plan and Torrance General Plan. The siting of 157 new housing units (177 bed spaces) within 0.2 miles of the several bus stops along the Beach Cities Transit Line 102 would be consistent with Redondo Beach General Plan Housing Element (e.g., Policy 3.~~3~~2) goals and policies (refer to Section 3.10, *Land Use and Planning*) to increase housing opportunities near existing transit. The creation of 157 Assisted Living units is also consistent with the Redondo Beach General Plan Housing Element (e.g., Policy 5.2), which aims to enhance existing housing stock and expand housing opportunities that meet the special needs of elderly and disabled residents. The proposed Project would not induce additional growth other than what was already anticipated in the RTP/SCS and the Redondo Beach General Plan Housing Element and would not have growth inducing impacts.

## 4.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Through the scoping process, BCHD determined that the proposed Project would have *no impact* on: Agriculture and Forestry Resources; Mineral Resources; Recreation; and Wildfire.

Agriculture and Forestry Resources

The proposed Project would not have the potential for significant impacts associated with important agricultural or forestry resources. The Project site and surrounding areas are urbanized and do not contain any developed agricultural or forestry resources. The proposed Project would not change any land use designations affecting such resources and would not indirectly affect such resources. Therefore, there would be *no impacts* to these resource areas.

Mineral Resources

The proposed Project would not have the potential for significant impacts associated with important mineral resources. No mineral extraction operations occur on the site or in the nearby vicinity. Additionally, the Project site is not designated as an existing mineral resource extraction area by the State of California. Given that the Project site is located within a highly urbanized area of the Cities and has been previously disturbed by development, the potential for mineral resources to occur onsite is low (City of Torrance 2010). Therefore, construction and operation of the proposed Project would not result in the loss of availability of a mineral resource or mineral resource recovery site and *no impacts* would be expected.

Recreation

The City of Redondo Beach has 32 regional, community, neighborhood parks and parkettes that total over 130 acres and range in size from 0.07 acres (i.e., Matthews Parkette) to 20.6 acres (i.e., Dominguez Park) (City of Redondo Beach 2008). Similarly, the City of Torrance Community Services Department operates and manages over 40 parks and recreation facilities, libraries, and open spaces for residents of Torrance and the South Bay. Parks in Torrance range in size from 0.1 acre (i.e., John F. Kennedy and Keller Memorial Squares) to 52 acres (i.e., Columbia Park) (City of Torrance 2010). The cities also provide and maintain stretches of sandy beach, off-leash dog parks, bike and walking paths, lawn areas, and other recreational opportunities for residents, employees, and visitors. Recreational areas near the Project site include the Dominguez Park

(northeast of Beryl Street and Flagler Lane), Sunnyglen Park (approximately 1,190 feet southwest), and Entradero Park (approximately 1,390 feet east).

Redondo Beach's park inventory of more than 150 acres currently provides approximately 2.3 acres of parkland per 1,000 residents, and Torrance's park inventory of more than 355 acres provides approximately 2.44 acres of parkland per 1,000 residents, well below the Los Angeles County average of 3.3 acres per 1,000 residents (County of Los Angeles and County of Los Angeles Department of Parks & Recreation 2016). The proposed Project would provide approximately 125,890 sf of open space during Phase 1 and approximately 114,830 sf of open space during Phase 2 of the proposed Project, including a central lawn for public events such as outdoor movie nights, sensory gardens, a flexible use platform for fitness classes, landscaped pedestrian pathways, ~~two outdoor dining terraces,~~ a rooftop garden, and a Demonstration Garden. The proposed Project would also include a tree-lined promenade (Main Street) that could support farmers' markets and health fair expositions and a porch along the southern façade of the RCFE Building. Landscaped private open space (i.e., backyard garden lounge) is also included along the northern exterior of the RCFE building. The proposed Project also includes construction of a 31,300-sf Aquatic Center. Although this would not be considered a formal recreational amenity, public enjoyment of these facilities may substitute for some of the recreational demand for other recreational facilities throughout the City.

Because the proposed Project would not substantially increase demand on recreational facilities, potential impacts to recreational resources would be considered *less than significant.* Therefore, no further analysis of this issue is required.

Wildfire

The Project site is in a highly urbanized area and entirely within a Local Responsibility Area (LRA), approximately 3.3 miles from the nearest designated High or Very High Fire Hazard Severity Zone (FHSZ) associated with the Palos Verdes Estates. Redevelopment of the Project site would not exacerbate wildfire risks. The proposed Project would not involve installation of any infrastructure such as high-tension electricity lines that would exacerbate wildfire risk and would not increase public exposure to wildfires (i.e., placing residential uses in areas of high wildfire risk). Although the Project site is located on a significant slope, Project implementation would comply with all recommendations in the Geotechnical Study Report (refer to Section 3.6, *Geology and Soils*) and would employ low-impact development (LID) drainage systems on-site (refer to Section 3.9, *Hydrology and Water Quality*). Therefore, the proposed Project would not result in increased structural or population hazards associated with post-fire slope instability or drainage alterations. The Project site is accessible from multiple emergency response routes and would not

change or block an existing evacuation route since it is proposed within an established collection of parcels.

The Redondo Beach Fire Department (RBFD), which currently serves the Project site, has an average response time for medical emergencies of 5 minutes below the 6-minute objective established by the National Fire Protection Association (NFPA). The proposed Project would comply with all applicable Fire Code requirements (RBMC Title 3 Chapter 4 and TMC Division 8 Chapter 5) and the 500-foot maximum distance between existing fire hydrants would remain. Further, the 2020 Sewer Capacity Study prepared by John Labib & Associates for the Project indicates there is sufficient water pressure in the Project vicinity to support the Project (refer to Section 3.15, *Utilities and Service Systems*; see Appendix L). Therefore, there would be *no impacts* and issues involving wildfires are not analyzed further in this EIR.

Other Topics with No Impacts

Additional topics within environmental issue areas that would not result in potentially significant impacts were eliminated from further assessment in the EIR through the IS. The resource sections and topics not discussed further in the EIR include:

- Damage to scenic resources along a State-designated scenic highway (Section I, *Aesthetics* of the Initial Study [IS]): There are no designated State scenic highways or other designated scenic resources near the Project site; the nearest designated highway is the Mulholland Highway, located approximately 20 miles to the northwest.
- Impacts to species identified as a candidate, sensitive, or special status species (Section II, *Biological Resources* of the IS): The Project site is completely developed and nearly 90-percent paved and special status species are unlikely to occur, and the Biological Resources Survey completed for the Project site concluded that the site does not provide suitable habitat for any candidate, sensitive, or special status species in local or regional plans, policies, or regulations.
- Impacts to riparian habitat or other sensitive natural community (Section II, *Biological Resources* of the IS): No riparian habitat or other sensitive natural communities exist on or adjacent to the Project site.
- Impacts to State or federally protected wetlands (Section II, *Biological Resources* of the IS): The Project site is completely developed and there are no potential wetlands located on the Project site or in the nearby vicinity.
- Conflict with an adopted local, regional, or State Habitat Conservation Plan (Section II, *Biological Resources* of the IS): The Project site is not subject to an adopted Habitat

Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.

- Conflict with or obstruction of a State or local plan for renewable energy or energy efficiency (Section VI, *Energy* of the IS): The proposed Project would not displace any existing renewable energy facilities, would include the installation of solar electric and solar hot water systems as well as a stormwater capture system, and would comply with energy efficiency standards in the Building Code.
- Adverse effects including risk of loss, injury, or death related to rupture of a known earthquake fault (Section VII, *Geology and Soil* of the IS): There are no known active faults on or adjacent to the Proposed site and the proposed Project is not located within an Alquist-Priolo Earthquake Zone.
- Impacts related to soils incapable of adequately supporting septic tanks or alternative wastewater disposal facilities where sewers are not available (Section VII, *Geology and Soils* of the IS): The Project site and surrounding area is served by an existing sewer system; septic tanks would not be installed for the proposed Project.
- Safety hazards or excessive noise for people residing or working in a project area located within an airport land use plan or within 2 miles of an airport (Section IX, *Hazards and Hazardous Materials* of the IS): The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would not subject workers, clients, or visitors of the Project site to substantial hazards related to aircraft operating to or from the Hawthorne Municipal Airport or Los Angeles International Airport (LAX).
- Redirection of flood flows (Section X, *Hydrology and Water Quality* of the IS): There are no streams or rivers that traverse the Project site, and the proposed Project would not result in an impediment or alteration of flood flows.
- Release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone (Section X, *Hydrology and Water Quality* of the IS): The Project site is located outside of 100-year and 500-year flood zones and the tsunami inundation zone, and is not located near inland water bodies.
- Physical division of an established community (Section XI, *Land Use and Planning* of the IS): Development would be consistent with existing land uses and would not remove or divide any residential units.
- Exposure of people residing or working in the project area to excessive noise levels for projects located within the vicinity of a private airstrip or an airport land use plan (Section XIII, *Noise and Vibration* of the IS): The Project site is not located in the vicinity of a

private airstrip or Airport Influence Area for the Hawthorne Municipal Airport or and LAX.

- Displacement of existing people or housing (Section XIV, *Population and Housing* of the IS): The proposed Project would occur within the existing campus and would not remove or displace any housing or residential areas.
- Impacts associated with the need for or provision of new or physically altered schools (Section XV, *Public Services* of the IS): The proposed Project includes the development of 157 new Assisted Living units for use by the elderly and would not result in an increase in the number of students to the Redondo Beach Unified School District.
- Impacts associated with the need for or provision of new or physically altered parks (Section XV, *Public Services* of the IS): Implementation of the proposed Project would increase recreational space and result in a beneficial impact to recreational facilities in Redondo Beach.
- Impacts associated with the need for or provision of new or physically altered libraries (Section XV, *Public Services* of the IS): The robust library system in Redondo Beach would be able to accommodate the modest increase in population under the proposed Project.

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# 5.0 ALTERNATIVES

## 5.1 INTRODUCTION

This section of the Environmental Impact Report (EIR) evaluates alternatives to the Phase 1 preliminary site development plan and Phase 2 development program under the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) and analyzes the comparative environmental impacts associated with each alternative.

The California Environmental Quality Act (CEQA) Guidelines state that an "*EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives*" (CEQA Guidelines Section 15126.6[a]).

The CEQA Guidelines further state that "*the range of alternatives required in an EIR is governed by a 'rule of reason'*" that requires the EIR to set forth only those alternatives necessary to permit fully informed decision making. The alternatives shall be limited to ones that would avoid or substantially reduce any of the significant and unavoidable effects of the proposed Project. Of those alternatives, the EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic project objectives (CEQA Guidelines Section 15126.6[f]). The EIR must also identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process (CEQA Guidelines Section 15126.6[c]).

Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6[a]). In defining the feasibility of alternatives, the CEQA Guidelines state that "*among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site*" (CEQA Guidelines Section 15126.6[f][1]). The CEQA Guidelines also require the analysis of a No Project Alternative (CEQA Guidelines Section 15126.6[e][1]). Based on the alternatives analyzed, the lead agency must identify an environmentally superior alternative (CEQA Guidelines Sections 15091, 15126.6[e][2]). The lead agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible (CEQA Guidelines Section 15126.6[a], [c], and [f]).

The EIR should include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. The alternatives analyzed in this EIR have been prepared at a sufficient level of detail to permit their consideration for adoption by the BCHD Board of Directors.

The alternatives analysis for this EIR is presented in the following four parts. Section 5.2, *Project Objectives* below describes the objectives of the proposed Project. Section 5.3, *Summary of Potentially Significant Impacts* summarizes the potentially significant impacts of the proposed Project from information presented in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*. Section 5.4, *Alternatives Considered but Rejected from Further Analysis* identifies alternatives considered but rejected for further analysis. Section 5.0, *Alternatives Analysis* describes the alternatives selected for full evaluation, and discusses potential impacts under each of these alternatives. Section 0, *Identification of the Environmentally Superior Alternative* concludes with the identification of an environmentally superior alternative, which is the alternative that generates the fewest significant.

## 5.2 PROJECT OBJECTIVES

As discussed in Section 2.4, *Project Objectives*, BCHD developed three major *"Project Pillars,"* which were presented to the Board of Directors during a public meeting on June 17, 2020. The Project Objectives are based on these three Project Pillars:

<u>Health</u>

- Build a center of excellence focusing on wellness, prevention, and research.
- Leverage the campus to expand community health programs and services.

<u>Livability</u>

- Focus on emerging technologies, innovation, and accessibility.
- Create an intergenerational hub of well-being, using Blue Zones Project principles.

<u>Community</u>

- Actively engage the community and pursue partnerships.
- Grow a continuum of programs, services, and facilities to help older adults age in their community.

Based on these Project Pillars, BCHD developed six Project Objectives:

- Eliminate seismic safety and other hazards of the former South Bay Hospital Building (i.e., 514 North Prospect Avenue).
- Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services.
- Provide sufficient public open space to accommodate programs that meet community health needs.
- Address the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces.
- Redevelop the Project site to create a modern campus with public open space and facilities designed to meet the future health needs of residents, including a Community Wellness Pavilion with meeting spaces for public gatherings and interactive education.
- Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs.

## 5.3 SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS

The proposed Project would result in significant and unavoidable impacts associated with construction noise levels (refer to Section 3.11, *Noise*). In addition, the proposed Project would result in impacts that are either *less than significant* or *less than significant with mitigation*, which are related to areas of community concern that were identified during community meetings held between 2017 and 2020 as well as agency and public comment letters received on the Notice of Preparation (NOP) (see Appendix A). These areas of community concern include potential impacts to visual resources as a result of building height, construction-related air emissions, erosion during excavation and grading, existing soil contamination and hazardous materials, vehicular access, and transportation (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.6, *Geology and Soils*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; and 3.14, *Transportation*, respectively). While this EIR concludes that impacts to these environmental issue areas are not anticipated to be significant, these impacts, in addition to the significant and unavoidable construction-related noise impact, were used as screening criteria to determine appropriate alternatives that could avoid or substantially reduce the environmental impacts identified for the proposed Project (see Section 5.4, *Alternatives Considered but Discarded* and Section 5.5, *Alternatives Analysis*). Refer to Section 1.8, *Areas of Known Public Controversy* for a more detailed discussion environmental issues known to be of public concern.

Aesthetics and Visual Resources

As described further in Section 3.1, *Aesthetics and Visual Resources*, the existing Project site is developed with the Beach Cities Health Center and the attached maintenance building, two medical office buildings, a parking structure, and surface parking lots. The tallest building on-site is the Beach Cities Health Center, which is 5 stories tall with a rooftop projection (i.e., elevator shaft) reaching up to a height of 76 feet above the campus ground level. The proposed Residential Care for the Elderly (RCFE) Building included in the Phase 1 preliminary site development plan would have a maximum roof height of approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below, including rooftop projections for permitted elements (e.g., elevator shafts, stairs, photovoltaic solar panels, etc.). While there are no designated scenic vistas or scenic view corridors in the vicinity of the Project site identified by the City of Redondo Beach or City of Torrance, the highpoint of 190$^{th}$ Street at Flagler Lane (i.e., Representative View 6) provides wide-ranging panoramic views of Redondo Beach to the south, including the ridgeline of the Palos Verdes hills. Under the proposed Project, the rooftop of the proposed 6-story RCFE Building would substantially interrupt the ridgeline of the Palos Verdes hills as seen from that public viewpoint. However, implementation of Mitigation Measure (MM) VIS-1 would reduce the height of the building such that it would no longer interrupt this ridgeline. With implementation of MM VIS-1, impacts to this important scenic vista would be *less than significant with mitigation*.

Air Quality

As described in Section 3.2, *Air Quality*, peak daily construction emissions during Phase 1 and Phase 2 would be well below South Coast Air Quality Management District (SCAQMD) thresholds, and therefore would be *less than significant*. However, on-site construction-related emissions would exceed the SCAQMD localized significance thresholds (LSTs) for respirable particulate matter ($PM_{10}$) and fine particulate matter ($PM_{2.5}$) as they affect off-site receptors. MM AQ-1 would require watering of exposed surfaces three times daily achieving a fugitive dust reduction of 74 percent and prohibiting demolition when wind speed is greater than 25 miles per hour (mph), which would achieve a fugitive dust reduction of 98 percent. Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be *less than significant with mitigation*.

Similarly, construction activities associated with the proposed Project would generate diesel particulate matter (DPM). However, MM AQ-1 requires the use of U.S. Environmental Protection Agency (USEPA) Tier 4 engines on all construction equipment, except crushing equipment, which

would reduce DPM emissions from combustion by 79 to 94 percent. With the use of Tier 4 engines, DPM emissions anticipated during the construction of Phase 1 would not exceed SCAQMD thresholds for cancer risk, and impacts to sensitive receptors due to temporary, localized construction DPM emissions would be *less than significant with mitigation*.

Biological Resources

As described in Section 3.3, *Biological Resources*, the proposed Project would result in the removal of landscaped trees, shrubs, and other non-native vegetation that may provide nesting and roosting habitat. MM BIO-1 would require avoidance of construction activities during nesting season to the extent practicable. If construction during nesting season cannot be avoided, pre-construction nesting bird surveys would be completed prior to vegetation removal. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be *less than significant with mitigation*.

Cultural Resources and Tribal Cultural Resources

Under the proposed Project, major earthwork would involve demolition, grading, and excavation of the previously disturbed Project site during both Phase 1 and Phase 2. Ground disturbing activities could uncover previously unknown archaeological deposits that qualify as archeological resources as defined CEQA Guidelines Section 15064.5 and tribal cultural resources, as defined in Public Resources Code Section 21074. Nevertheless, MM CUL-1a and -1b requires Native American Monitoring and the development of an Archaeological Resources Monitoring Plan. A Native American tribal monitor and qualified archaeologist shall be required during ground disturbing activities during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The Archaeological Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary. Implementation of these measures would ensure that any potential impacts associated with Phase 1 and Phase 2 of the proposed Project would remain *less than significant with mitigation*.

Geology and Soils

Construction of the proposed Project would involve the excavation of approximately 20,000 cubic yards (cy) of soil during implementation of the Phase 1 preliminary site development plan and 11,000 cy of soil during construction associated with the Phase 2 development program. Additionally, grading would be required to backfill the basement associated with the Beach Cities Health Center and to level the other areas of the Project site. While construction activities would be temporary – lasting for a period of 29 months during Phase 1 and approximately 28 months during Phase 2 – excavation and grading associated with the proposed Project would result in exposed soil and the potential for erosion caused by wind and/or stormwater runoff. The proposed Project would be required to implement erosion control best management practices (BMPs) in accordance with a Stormwater Pollution Prevention Plan (SWPPP) in order to meet the requirements of the Construction General Permit. Additionally, BCHD would be required to prepare and implement Standard Urban Stormwater Mitigation Plan (SUSMP) to address soil erosion and urban runoff. Further, compliance with all earthwork and site grading, design, and construction recommendations, including implementation of a monitoring program as recommended in the Geotechnical Report prepared for the proposed Project, as required by MM GEO-1, would reduce the risk of potential impacts associated with geologic hazards to less than significant. Under MM GEO-2a, a qualified paleontologist would develop a worker awareness program which would include education on appropriate procedures to enact should paleontological resources be discovered during development, further detailed in MM GEO-2b. With the implementation of BMPs in accordance with the SWPPP, and the SUSMP, ~~and~~ low impact development (LID) requirements, current California Building Code requirements, MM GEO-1, MM GEO-2a, and MM GEO 2b, potential impacts ~~to geology and soil resources, including paleontological resources~~ ~~associated with erosion or the loss of topsoil~~ to geology and soil resources, including paleontological resources would be *less than significant*.

Hazards and Hazardous Materials

Due to the age of the existing buildings on-site it is assumed that asbestos-containing material (ACM) and lead-based paint (LBP) are present in the buildings proposed for demolition under the Phase 1 preliminary site development plan and the Phase 2 development program (refer to Section 3.8, *Hazards and Hazardous Materials*). Additionally, the transformers and florescent light ballasts on-site may contain polychlorinated biphenyls (PCBs) and mold could also potentially be present. If not properly abated, the accidental release of ACM, LBP, PCBs, and/or mold could pose a hazard to the environment and public health. However, implementation of MM HAZ-1 and compliance with existing mandatory regulations and BMPs related to the treatment, handling, and

disposal of ACM, LBP, PCBs, and mold, would ensure that impacts associated with the proposed Project would be *less than significant with mitigation*.

As previously described, construction of the proposed Project would involve the excavation of substantial amounts of soil and additional earthwork associated with trenching and grading. Soil disturbance during excavation, trenching, and grading at the Project site would result in the disturbance of potentially contaminated soil (refer to Section 3.8, *Hazards and Hazardous Materials*). The implementation of MM HAZ-2a through -2d would ensure volatile organic compounds (VOCs) and contaminated soils are properly detected, removed, and handled during ground disturbing activities. Therefore, the risk of an accidental release of hazardous materials into the environment during construction of the proposed Project would be *less than significant with mitigation*.

A previously abandoned and plugged oil and gas well is located on the vacant Flagler Lot. Soil samples taken from the lot detected Total Petroleum Hydrocarbons (TPH) levels well below the DTSC and USEPA residential screening levels. As such, the abandoned well is not a potential hazard to the environment or public health. Nonetheless, as required under MM HAZ-3, prior to demolition or ground-disturbing activities on the vacant Flagler Lot, BCHD shall enroll in the California Geologic Energy Management Division's (CalGEM's) Well Review Program and adhere to all recommendations provided by CalGEM, through implementation of MM HAZ-3, impacts would be *less than significant with mitigation.*

Land Use

As described in Section 3.10, *Land Use and Planning*, the proposed one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may be potentially inconsistent with Torrance Municipal Code (TMC) Section 92.30.8, which prohibits site access to commercial or industrial properties from local streets when access from a major or secondary arterial road is available. The purpose of this policy is to avoid vehicle traffic from commercial or industrial uses through residential streets within Torrance. The proposed one-way and pick-up/drop-off zone exit would be limited to left-turn only onto northbound Flagler Lane and would prohibit vehicle traffic onto southbound Flagler Lane towards the Torrance neighborhood to the east of the Project site. Similarly, the proposed service area and loading dock entry/exit would provide right-turn in and left-turn out access to avoid cut-through traffic within the Torrance neighborhood. This service entrance would be limited to service vehicles and delivery vehicles only and would not be used by staff, residents, participants, or other visitors to the BCHD campus. Nevertheless, Flagler Lane, which is designated as a local street in

the Torrance General Plan Circulation and Infrastructure Element. Since vehicular access to the Project site is available from North Prospect Avenue and Beryl Street, which are both identified as secondary arterial streets by the Redondo Beach General Plan Circulation Element (refer to Section 3.14, *Transportation*), the proposed access along Flagler Lane may be potentially inconsistent with TMC Section 92.30.8. (The applicability of this policy remains unclear given that Beryl Street is located within Redondo Beach and the vacant Flagler Lot has been zoned as C-2 [Commercial] by the City of Redondo Beach.) Nevertheless, as described in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation* the development of this proposed driveway would not result in any significant environmental impacts with regarding to air emissions, roadway noise, or geometric roadway hazards. While development of the proposed access points the within the City of Torrance right-of-way may potentially conflict with TMC Section 92.30.8, it would not cause a significant environmental impact. Therefore, impacts related to land use and planning would be *less with significant*.

Cut-through traffic within residential neighborhoods and nearby schools was identified as a concern raised by the City of Torrance and the Torrance residents during the public scoping period. It should also be noted that the City of Torrance is considering the removal of the southbound traffic along Flagler Lane between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the proposed subterranean service area and loading dock under the proposed Project.

Noise

All phases of construction associated with the proposed Project would involve the use of heavy construction equipment (e.g., cranes, bulldozers, excavators, etc.). Additionally, demolition and excavation would include the use of haul trucks and construction of the structures would require the use of concrete trucks. Construction activities would produce increased noise levels that would impact surrounding noise-sensitive receptors. MM NOI-1 would require the implementation of noise attenuation measures, including the use of noise barriers (i.e., sound wall) on the campus to encompass the development footprint associated with Phase 1 and Phase 2 construction. Compliance with existing local noise regulations along with the implementation of MM NOI-1 would reduce potential noise impacts. However, given the maximum roof heights of the proposed RCFE Building (i.e., 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below) and other proposed building(s) under the Phase 2 development program (i.e., up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below),

construction of noise barriers to a height necessary to break the line of sight from surrounding sensitive receptors would be infeasible. With implementation of a noise barrier, sensitive receptors would not be directly impacted by construction noise until development reached a height that exceeded the noise barrier. However, as development would exceed the noise barrier, noise levels would exceed the Federal Transit Administration's (FTA's) residential criterion (8-hour $L_{eq}$ of 80 dBA or 30-day average $L_{dn}$ of 75 dBA). Therefore, *significant and unavoidable* noise impacts would occur during portions of the proposed construction – including for the Phase 1 preliminary site development plan and the Phase 2 development program.

To further reduce the noise levels resulting from construction of the proposed Project for off-site residential uses, recommended mitigation measure MM NOI-2 and MM NOI-3a through 3d would be implemented. Under MM NOI-2, haul and delivery truck operations would enter and exit the Project site utilizing the lane farthest from residences along the given haul route Implementation of MM NOI-3a would eliminate nighttime noise impacts associated with heavy-duty delivery trucks by limiting delivery operations to daytime operating hours (7:00 a.m. to 4:00 p.m.) and would reduce daytime noise impacts associated with heavy-duty delivery trucks by prohibiting idling longer than 5 minutes. Implementation of MM NOI-3b would substantially reduce operational noise associated with outdoor fitness classes and community events by requiring a qualified acoustical engineer ensure that event set ups would meet the acceptable exterior noise criteria of 50 to 55 dBA consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2. Implementation of MM NOI-3c would ensure Aquatic Center operations close by 10:00 p.m. Implementation of MM NOI-2, MM NOI-3a, -3b, and -3c, would further ensure impacts associated with proposed Project operations would be *less than significant*.

Transportation

Construction activities associated with Phase 1 of the proposed Project would generate up to approximately 1,825 haul truck trips for export of demolished asphalt and excavated soil, and 2,000 haul truck trips for export of demolition debris. Additionally, construction of the proposed RCFE Building would require approximately 1,237 truck trips for concrete delivery. Backfill of the Beach Cities Health Center basement would require approximately 875 truck trips for import of clean soil (refer to Section 2.5.1.3, *Construction Activities*). Construction activities associated with the Phase 2 development program would require approximately 1,660 trips associated with export of demolition debris and excavated soil and approximately 2,149 trips associated with concrete and steel deliveries (refer to Section 2.5.2.4, *Construction Activities*). Construction-related haul truck trips and worker vehicle trips would result in additional trips per day on the surrounding street network – including Pacific Coast Highway and Interstate (I-) 405 – throughout

the construction period, which would increase vehicle miles traveled (VMT), disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian mobility and safety. However, construction-related increases in traffic would be intermittent throughout the construction period associated with the Phase 1 preliminary site development plan and the Phase 2 development program, and would be temporary in nature. Haul trucks would exit the I-405 freeway on 190th Street or Hawthorne Avenue to 190th Street and reach the site using Del Amo Street to North Prospect Avenue to avoid residential streets to the maximum extent feasible. MM T-2 would reduce this impact by requiring preparation and implementation of a Construction Traffic and Access Management Plan, which would include provisional measures to reduce construction-related traffic and maintain public safety. With the implementation of MM T-2, construction-related transportation impacts would be reduced to *less than significant with mitigation*.

Implementation of Phase 1 is estimated to reduce existing trip generation by approximately 1,919 daily trips, 234 AM peak hour trips, and 158 PM peak hour trips. Therefore, Phase 1 of the proposed Project would reduce VMT. However, following the development of under Phase 2, the proposed Project would result in an increase in daily trip generation associated with the Aquatics Center and the relocation of the Center for Health and Fitness (CHF) back to the campus. The net trip generation from Phase 2 of the proposed Project is expected to be 376 additional daily trips, with 37 fewer AM peak hour trips and 28 fewer PM peak hour trips (refer to Table 3.14-7 in Section 3.14, *Transportation*). While the implementation of the Phase 2 development program is expected to generate an increase in daily trips and associated VMT, BCHD generates a shorter average trip length than typical uses in the South Bay Cities Council of Governments (SBCCOG) subregion by nature of its service area. As described in Table 3.14-11, the Southern California Association of Governments (SCAG) Regional Travel Demand model determined that home-based work VMT generated within the Project Transportation Analysis Zone (TAZ) does not exceed the threshold of 16.8 percent below the regional average, and impacts related to home-based work VMT under the proposed Project are considered to be *less than significant*. However, the TAZ home-based VMT per capita would exceed the threshold of 16.8 percent below the regional average. Therefore, based on the SCAG model, implementation of proposed Project could result in a potentially significant impact associated with home-based VMT. However, the proposed Assisted Living units would generate vehicle trips and VMT at a lower level than typical residential uses contained in the SCAG model forecast as explained under Impact T-2 in Section 3.14, *Transportation*. Further, the proposed Project would implement several transportation-related sustainability features that are not accounted for in the SCAG Regional Travel Demand

model estimation of home-based VMT (e.g., shared vans for the Assisted Living, Memory Care, and Program of All-Inclusive Care for the Elderly [PACE] service to transport several participants at once, bicycle sharing program, etc.). Therefore, impacts with regard to Project-related operational VMT would be *less than significant* (refer to Section 3.14, *Transportation*). While the proposed Project would not generate VMT that would result in a significant transportation impact, MM T-1 is recommended to provide additional information regarding the proposed Transportation Demand Management (TDM) plan consistent with the requirements of RBMC Section 10-2.2406. Implementation of the TDM plan would further reduce VMT associated with the proposed Project. Further, MM T-3 would relocate the existing Beach Cities Transit Line 102 northbound bus stop from its current position on eastbound Beryl Street to the south side of Beryl Street between the proposed one-way driveway entrance to the west and the intersection with Flagler Lane to the east.MM T-3 is also recommended to reduce operational impacts associated with sight distance and vehicle-bus conflicts at the proposed one-way driveway along Beryl Street.

## 5.4 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

As previously described, CEQA Guidelines Section 15126.6(c) requires that an EIR disclose alternatives that were considered and rejected for further analysis, and provide a brief explanation as to why such alternatives were eliminated from detailed consideration. As required by the CEQA Guidelines, the selection of alternatives for the proposed Project included a screening process to determine which alternatives could avoid or substantially reduce the environmental impacts associated with the proposed Project while also feasibly meeting the Project Objectives. The following alternatives were considered but eliminated from further analysis due to infeasibility or inconsistency with Project Objectives.

Upgrade the Beach Cities Health Center (No Seismic Retrofit)

This alternative would involve interior renovation of the Beach Cities Health Center, including demolition of interior walls, upgrades to existing electrical and plumbing systems, and reconfiguration of interior space to better accommodate potential tenants. This alternative would not include retrofits to address seismic-related structural deficiencies and potential public safety hazards due to the infeasible financial cost of such retrofits. However, the interior renovation of the Beach Cities Health Center would address other existing maintenance issues (e.g., outdated electrical and plumbing systems) and would provide space configurations that would be better suited for potential tenants. Upgrade of the Beach Cities Health Center would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. The financial investment required to renovate the Beach Cities Health

Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. Therefore, this alternative would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD. Upgrade of the Beach Cities Health Center would not meet any of the Project Objectives, including eliminating seismic safety hazards of the Beach Cities Health Center or providing public open space to accommodate community health programs.

Demolish the Beach Cities Health Center and Redevelop within the Center of the BCHD Campus

BCHD considered an alternative approach to redeveloping the existing campus by demolishing the existing Beach Cities Health Center before constructing the proposed RCFE Building. Under this alternative BCHD considered three conceptual site plan layouts. Two of these conceptual site plan layouts involve the positioning of the proposed RCFE Building in a similar location along the northern perimeter of the campus behind the Redondo Village Shopping Center. However, under both of these conceptual site plan layouts, portions of the proposed RCFE Building would extend into the original footprint of the Beach Cities Health Center. The third conceptual site plan alternative considered repositioning the RCFE Building into the central area of the campus with the open space located along the northern perimeter of the campus behind the Redondo Village Shopping Center.

Each of the three conceptual site plan layouts would require tradeoffs in the internal circulation and the size and utility of the open space. Only one of these conceptual site plan layouts (i.e., locating the proposed RCFE Building within the center of the campus) would measurably decrease the frontage of the proposed RCFE Building along the eastern border of the campus. However, each of these conceptual site plans would result in a longer duration for construction activities due to a stop-start nature of construction. Under the proposed Project there would be some overlap in construction and demolition activities, whereas under these conceptual site plan layouts demolition would need to be completed prior to the construction of the proposed RCFE Building. It is estimated that the start-stop nature of construction activities under this alternative would result in an additional 6 months of construction during Phase 1. Additionally, as described in Section 2.4, *Project Objectives*, the continued operation of the Beach Cities Health Center is necessary to ensure revenue for programs and services provided by BCHD as well as funding for the completion of the development under Phase 1. The demolition of the Beach Cities Health Center under this alternative would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the proposed demolition and construction. This would be financially infeasible for BCHD and would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD.

Development on Alternate Site

*The property at 1100 North Harbor Drive, which supports the AES Redondo Beach Power Plant, was initially considered as an alternative site for the proposed BCHD Healthy Living Campus, but was removed from consideration due to the incompatible zoning (P-GP) at the site.*

Alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities were considered. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities.

1100 North Harbor Drive, Redondo Beach is currently occupied by AES Redondo Beach LLC, which plans to continue operation of the site as a natural gas-fired power plant through 2021. Although AES Redondo Beach LLC finalized the sale of the site to a private developer in March 2020, the new owner of the site is currently considering future redevelopment options with the City of Redondo Beach and California Coastal Commission. The site is large enough (approximately 51 acres) to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan. The site is also located along Beach Cities Transit Line 102, and in close proximity to bicycle and pedestrian facilities as well as the Redondo Beach Pier, which is a major commercial center. However, the site is zoned as P-GP (Generating Plant), which would allow for recreational facilities but would not permit hospitals, medical offices and health-related facilities, or residential care facilities. The site could also present additional constraints related to soil contamination from previous operations. All other Public or Institutional sites within the City of Redondo Beach are developed with public schools, public parks, or plant nurseries. BCHD could apply for a zoning change; pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote.

Alternative sites within Hermosa Beach would require a PF (Public Facility) land use designation to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan. Existing properties designated PF within Hermosa Beach are developed with public schools (e.g., Hermosa Valley School, Hermosa View Elementary School), public parks (e.g., Valley Park), public service facilities (e.g., Hermosa Beach City Hall, Hermosa Beach Police Department, Los Angeles County Fire Department Station 100), community facilities (e.g., Hermosa Beach Community Center, Hermosa Beach Historical Society, Hermosa Beach Farmers Market) or public parking that provides coastal access. There are no undeveloped or underdeveloped sites designated as PF within Hermosa Beach, which are also large enough to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan.

*Development of the proposed Healthy Living Campus at 3621 Bell Avenue and 3601 Bell Avenue in Manhattan Beach could be constrained by hazardous materials contamination from existing operations at the National Guard Armory.*

Similarly, a majority of the properties designated Public Facilities within Manhattan Beach are developed with public schools (e.g., Mira Costa High School, Meadows Elementary School, Manhattan Beach Middle School), public service facilities (e.g., Manhattan Beach City Hall, Manhattan Beach Police Department, Manhattan Beach Fire Department Station 1, Manhattan Beach Library), community facilities (e.g., Joslyn Community Center) and public parking. One Public Facilities site, which includes the properties at 3621 Bell Avenue and 3601 Bell Avenue, comprises a large site (approximately 11 acres) within northern Manhattan Beach. These properties are currently developed with the Manhattan Beach Public Works Yard and National Guard Armory, respectively, and are not currently available for purchase. Another site south of Sand Dune Park and north of Grandview Elementary School is an undeveloped Public Facilities site within Manhattan Beach. However, this site comprises less than 3 acres and therefore, is not large enough to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan.

Development at alternate sites within the Beach Cities may also be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project, including impacts related

to aesthetics, criteria pollutant and greenhouse gas (GHG) emissions, geology and soils, hazardous materials, noise, and transportation. Additionally, none of the potential alternate sites within the Beach Cities are under ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. Therefore, alternative locations in the Beach Cities were determined not to be feasible for development of the proposed BCHD Healthy Living Campus Master Plan.

Development of Hospital, Medical Office, or Assisted Living

Under this alternative, BCHD would demolish the existing Beach Cities Health Center to proactively address seismic-related structural deficiencies and potential public safety hazards. Following demolition of the Beach Cities Health Center, BCHD would redevelop the existing campus to support one of the following alternative uses: a new hospital, purpose-built medical offices, or assisted living units. Each of these alternative uses would involve construction activities, including demolition, grading, soil hauling, materials delivery, and development of new facilities. Additionally, given the trip-making characteristics of these uses, some alternative uses may result in an increase in operational impacts (e.g., an increase in daily trips and VMT). Development of any one of these alternative uses would allow for smaller building space and reduced building heights as compared to the buildings included as part of the proposed Project (i.e., 6-story RCFE building in Phase 1 and Phase 2 parking structure with up to 8.5 above ground levels). Therefore, all of the alternate uses considered for the campus would result in less severe impacts to public views than those described under Phase 1 and Phase 2 of the proposed Project.

- **Hospital.** The Beach Cities Health Center was originally constructed in 1958 as the publicly owned South Bay Hospital, providing hospital beds, surgery rooms, and emergency operating areas. However, in 1998 the South Bay Hospital closed due to competition with nearby privately owned hospitals, such as Torrance Memorial Medical Center and Little Company of Mary. These hospitals continue to exist today (Little Company of Mary is now Providence Little Company of Mary Medical Center) as well as others (e.g., Providence Medical Institute in Redondo Beach and Torrance Memorial Urgent Care in Manhattan Beach). The existing hospitals in the region continue to meet the existing demand; therefore, there is currently no long-term need or demand for an additional hospital serving the Beach Cities.
- **Medical Office Building.** The campus currently provides dedicated medical office space within the Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building. Leasing such spaces to tenants is a major source of BCHD revenues that in turn support existing BCHD programs

and services. This alternative would include demolition of the existing Beach Cities Health Center and replacement with one or several medical office buildings. These offices would generate additional revenue for BCHD, which would be potentially sufficient funding to replace revenue that would be lost from discontinued leases within the Beach Cities Health Center. However, there is increased competition from purpose-built medical office space provided elsewhere, notably in close proximity to active hospitals in the region. As such, provision of additional medical office space may not be economically viable. Further, medical offices are one of the primary vehicle trip generators on the existing campus. Redevelopment of the campus with new purpose-built medical office space would result in potentially significant transportation-related impacts to the surrounding roadway network. Under this alternative, existing programs and services located within the Beach Cities Health Center would not be relocated or reconstructed on-site. Discontinuation of these programs and services would not support BCHD's mission of enhancing community health and wellbeing for all residents of Beach Cities and nearby South Bay communities. This alternative would not support project objectives relating to enhancing public open space, addressing the growing need for community integrated assisted living facilities, and providing for the future health needs of the community.

- **Assisted Living.** Redeveloping the campus to support additional Assisted Living units was also considered. An Assisted Living and Memory Care Market Feasibility Study was prepared in 2019 in support of the proposed Project (MDS Research Company, Inc. 2019). The Market Feasibility Study assessed the practicality of relocating 60 Silverado Memory Care units and developing 157 new Assisted Living units based on senior demographics in the local areas, population of income qualifying households in the primary market area, and occupancy rates of competitor senior residential housing options. These options include independent living communities (i.e., Brookdale South Bay, Seasons Senior Apartments, etc.), stand-alone assisted living / residential care communities (i.e., Canterbury Retirement Community, Palos Verdes Villa, etc.), and Alzheimer's / memory care facilities (i.e., Well Brook Senior Living, Sunrise of Hermosa Beach, etc.) The study also took into consideration future planned senior residential housing options (i.e., Kensington, which began operation in the Summer of 2019). Given the existing competitor senior housing options in the area and given the current and projected senior demographic populations in the Redondo Beach area, the study concluded there is sufficient size and depth of the qualified target market to introduce 157 new Assisted Living units. Under this alternative, the Project site would be redeveloped with a greater number of Assisted Living units that surpasses the quantity assessed in the market feasibility study. This alternative

may not be economically viable due to existing and planned competitor senior residential housing options in the vicinity. Further, this alternative would not include the Youth Wellness Center, Aquatics Center, CHF, Blue Zone café with a Demonstration Kitchen, or associated programs, reducing BCHD's capacity to meet its mission of enhancing community health through partnerships, programs, and services for all residents of Beach Cities and nearby cities. Without these programs and services, Project Objectives to provide intergenerational programs, shared gathering spaces, and facilities integrated with the broader community, as well as to meet future community health needs, would not be met.

## 5.5 ALTERNATIVES ANALYSIS

This section discusses alternatives to the proposed Project that were carried forward for detailed analysis, including the No Project Alternative, pursuant to CEQA Guidelines Section 15126.6(e). Each of these considers the ability of a particular alternative to substantially reduce or eliminate one or more of the significant environmental impacts associated with the proposed Project (refer to Section 5.3, *Summary of Potentially Significant Impacts*), while still meeting most of the basic Project Objectives. These alternatives include:

- Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)
- Alternative 2 – Sale and Redevelopment of the BCHD Campus
- Alternative 3 – Revised Access and Circulation
- Alternative 4 – Phase 1 Preliminary Site Development Plan Only
- Alternative 5 – Relocate CHF Permanently and Reduced Parking Structure
- Alternative 6 – Reduced Height Alternative

### 5.5.1 Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)

Pursuant to CEQA Guidelines Section 15126.6(e)(2), the No Project Alternative analysis shall discuss the existing conditions at the time the NOP is published. The No Project Alternative is compared to the impacts described for the proposed Project, which in this case includes the Phase 1 preliminary site development plan and the more general Phase 2 development program, collectively intended to address building maintenance issues, seismic safety, and better support public health programs and services provided by BCHD. Under the No Project Alternative, the proposed BCHD Healthy Living Campus Master Plan would not be implemented and the existing campus would not be redeveloped. Additionally, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue.

The No Project Alternative assumes that the existing facilities on the campus – including the Beach Cities Health Center (514 North Prospect Avenue), Beach Cities Advanced Imaging Building (510 North Prospect Avenue), and the Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) – would continue to be used to provide for BCHD programs and services as well as tenant operations. This would include the continued operation of Community Services, CHF, Beach Cities Silverado Memory Care Community, and other tenant operations (e.g., outpatient medical office) in the Beach Cities Health Center. Additionally, tenant operations (e.g., outpatient medical office) would continue in the Beach Cities Advanced Imaging Building and the Providence Little Company of Mary Medical Institute Building. BCHD would continue to provide building maintenance as required. However, as described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

*Local Bond Measure and Seismic Retrofit*

Under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit, which would be exempt from CEQA (e.g., CEQA Guidelines Section 15302[a]). Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. However, the success of a local bond measure is speculative, particularly given the history of recent bond measure initiatives in the South Bay. For example, despite having relatively low school taxes, Hermosa Beach voters rejected local bond measures in 2008, 2010, and 2014, the latter of which was a $54 million bond that would have

increased property taxes by $29.50 per $100,000 in assessed valuation. A $59 million bond was eventually passed in 2016 with 59 percent of the vote. BCHD would not be able to continue to provide community health and wellness programs and services over a period of multiple election cycles with multiple campaigns at securing bond funding.

*Demolition and Creation of Limited Open Space*

If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities, as described further below.

Demolition of the Beach Cities Health Center would occur as described for the Phase 1 preliminary site development plan (refer to Section 2.5.1.6, *Construction Activities*). Following the vacation of the building, demolition of the Beach Cities Health Center would occur over a 1-month period. Demolition activities would generate approximately 32,000 cy of demolition debris – including structural steel, wood, glass, flooring, and utility material such as pipes and cables – which would be exported from the Project site in approximately 2,000 haul truck trips. Following the completion of demolition activities, the existing basement would be filled with approximately 14,000 cy of soil imported to the Project site in 875 truck trips over a period of 1 month.

Demolition would require the use of standard construction equipment, including an excavator, bulldozers, backhoes, and excavators to break up and remove existing asphalt, concrete, and building materials. A high-reach excavator would be used along with a variety of attachments (e.g., shears, crushers, and hydraulic hammers) to dismantle the structure to avoid flying debris and minimize dust and noise. Haul trucks would be used to export large amounts of debris to a mixed construction and demolition (C&D) debris recycling facility approved by the City of Redondo Beach pursuant to a Construction & Demolition Waste Management Plan. Where needed, any existing hazardous materials found during the demolished buildings (i.e., ACM, LBP, PCBs) or soil vapor contamination (i.e., tetrachloroethylene [PCE]) would be properly handled and disposed of in accordance with regulatory requirements.

When necessary, the existing Beach Cities Advanced Imaging Building would also be demolished following the end of existing tenant leases. The demolition of the Beach Cities Advanced Imaging Building would occur over a 3-month period and would involve the export of 8,550 cy of demolition debris. Demolition debris would be exported off-site in 972 haul truck trips.

Following the completion of demolition activities, the footprint of the existing buildings would be graded and redeveloped with landscaped turf and limited hardscaping. Given the funding limitations associated with the No Project Alternative and the need for BCHD to minimize costs associated with future maintenance activities, no restrooms or other park-like facilities (e.g., slides, recreational fields, etc.) would be constructed under the No Project Alternative and this area of the Project site would be used as a passive open space. (However, given the zoning designation of P-CF, it is unclear whether Redondo Beach would seek to require such facilities as a part of Planning Commission Design Review.) BCHD would fund limited long-term operational maintenance activities necessary for the landscaped turf and would use this area for community health and wellness services and programs (e.g., fitness classes, etc.) and other outdoor events, as feasible. However, given that the open space would not be surrounded by complementary uses (e.g., Assisted Living, Aquatics Center, CHF, etc.), its utility for these purposes would be much more limited than the open space described for the proposed Project. Additionally, with the reduction in revenue associated with the No Project Alternative, the capacity of BCHD to provide community health and wellness programs and services would be substantially reduced.

The medical offices in the Providence Little Company of Mary Medical Institute Building would remain along with the existing surface parking lots and the ground parking structure at 512 North Prospect Avenue.

The impacts associate with the No Project Alternative are described below and are presented in comparison with the impacts associated with the proposed Project, which are described in detail in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*.

Aesthetics and Visual Resources

Implementation of the No Project Alternative would result in the continued use of the Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building until building maintenance becomes financially infeasible over the next 2 to 3 years. At this point, BCHD would not renew or would terminate its leases with existing tenants and would begin demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, as needed.

Following the completion of demolition activities, the existing development of the campus would be substantially reduced in terms of its existing density. The central area of the campus (i.e., the existing footprint of the Beach Cities Health Center) would be flat and would allow for views across the Project site from North Prospect Avenue (e.g., Representative View 5). Similarly, the footprint of the Beach Cities Advanced Imaging Building would also be flat; however, views

across this area of the Project site from Flagler Lane and Flagler Alley (e.g., Representative View 2) would remain limited due to the existing topography. Following the completion of demolition activities, the remaining facilities would include the Providence Little Company of Mary Medical Institute Building as well as the parking structure at 512 North Prospect Avenue. The existing surface parking lots and subterranean parking garage would also remain. These remaining facilities at the campus would be relatively inconsistent with one another visually and would not form a campus-type environment. Additionally, the vacant Flagler Lot would remain undeveloped and would continue to be leased as a staging area for nearby construction projects. Therefore, existing views of this area from Beryl Street and Flagler Lane would continue to be characterized by exposed gravel and dirt and construction staging equipment.

Air Quality

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. However, with the exception of demolition, limited grading, and installation of landscaped turf and limited hardscaping, no additional construction activities would be required. Therefore, criteria air pollutant emissions associated with this alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Following the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building stationary source emissions (e.g., heating, ventilation, and air conditioning [HVAC]) from these buildings would be eliminated. Additionally, the daily vehicle trips associated with these buildings would also be eliminated. Stationary source emissions at the Project site would be limited to those from the Providence Little Company of Mary Medical Institute Building, and mobile source emissions would be limited to operational vehicle trips associated with the medical office building and landscaped open space. Therefore, operational emissions associated with the campus would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Biological Resources

Implementation of the No Project Alternative would involve the removal of landscaping adjacent to the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building during demolition. However, the No Project Alternative would not require the removal of any of

the landscaped trees along the eastern boundary of the Project site. Therefore, there would be a minor reduction in the potential for disturbance of nesting birds and other urban wildlife as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Cultural Resources and Tribal Cultural Resource

Under the No Project Alternative, construction activities would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. However, with the exception of limited grading and installation of turf landscaping and limited hardscaping, no additional ground disturbance would be required. Therefore, the potential for disturbance or other impacts to unknown buried cultural resources or tribal cultural resources would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Energy

The existing electricity, natural gas, and transportation energy demand associated with the campus would continue as described in Section 3.5.1, *Environmental Setting* until the leases with tenants are not renewed or are terminated within the next 2 to 3 years. However, with the exception of demolition, limited grading, and installation of turf landscaping and hardscaping, no additional construction activities would be required. As such, construction-related energy use would be temporary and negligible over the long-term.

Following the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, electricity, natural gas, and transportation energy demand from these buildings would be eliminated. Energy demand associated with the campus would be limited to the Providence Little Company of Mary Medical Institute Building. As described in Section 3.5.1, *Existing Setting*, the existing annual electricity demand of the Beach Cities Health Center alone is approximately 2,378,070 kilowatt-hours (kWh) and the existing annual natural gas demand of the Beach Cities Health Center is approximately 22,532 therms. Therefore, implementation of the No Project Alternative would substantially reduce the operational energy demand associated with the campus compared to existing conditions.

Geology and Soils

With the exception of demolition, limited grading, and installation of turf landscaping and limited hardscaping, the No Project Alternative would not involve additional ground disturbing activities

such as excavation or trenching. Therefore, the potential for soil erosion associated with this alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program.

Following the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, the central area of the campus (i.e., the existing footprint of the Beach Cities Health Center) would be landscaped with turf and there would be no exposed soils on the campus. However, the vacant Flagler Lot would remain undeveloped and would be characterized by exposed gravel and dirt with moderate slopes. Therefore, the potential for soil erosion at the vacant Flagler Lot would remain.

Greenhouse Gas Emissions and Climate Change

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. However, with the exception of demolition, limited grading, and installation of turf landscaping and limited hardscaping, no additional construction activities would be required. Therefore, GHG emissions associated with construction under this alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program.

Operationally, the GHG emissions associated with the campus would remain the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. Following the demolition of these buildings, GHG emissions from area, energy, waste, and water from these buildings would be eliminated. Additionally, the vehicle trips associated with these facilities would also be eliminated. Mobile source GHG emissions for this alternative would be limited to those operational vehicle trips associated with the Providence Little Company of Mary Medical Institute Building and limited open space turf landscaping. Therefore, operational emissions associated with the campus would be substantially reduced compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program. Implementation of the No Project Alternative would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs; however, the No Project Alternative would not include the sustainable design features described for the proposed Project, such as photovoltaic solar panels, solar hot water systems, and energy efficient HVAC systems, intended to reduce overall GHG impacts.

Hazards and Hazardous Materials

As previously described, the No Project Alternative would require the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. As described in Section 3.8, *Hazards and Hazardous Materials*, ACM, LBP, PCBs, and mold could potentially occur within the Beach Cities Health Center and other buildings on-site. Therefore, construction workers, employees, and visitors, and other members of the public could be exposed to these hazardous materials during demolition as well as hauling of demolition debris from Project site. Similar to the proposed Project, a comprehensive survey of ACM, LBP, PCBs, and mold would be conducted prior to and during the demolition activities and all demolition and hauling would occur in compliance with existing mandatory regulations and BMPs related to the treatment, handling, and disposal of ACM, LBP, PCBs and mold.

With the exception of demolition, limited grading, and installation of turf landscaping and limited hardscaping, no additional ground disturbing activities would be required. Therefore, the potential for impacts related to exposure of existing soil contaminants (i.e., PCE, benzene, and chloroform) would be substantially reduced compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program. Given the reduced scope and duration of construction activities, impacts associated with the temporary use of petroleum, oils, and lubricants for heavy construction equipment would also be substantially reduced. However, since no excavation or trenching would occur under the No Project Alternative, the existing concentrations of PCE, benzene, and chloroform beneath the Project site would not be removed and would remain as described in Section 3.8.1, *Environmental Setting*.

Hydrology and Water Quality

As previously described, the No Project Alternative would require the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. With the exception of demolition activities, minor grading, and installation of turf landscaping, no other ground disturbing construction activities (e.g., excavation, utilities trenching, etc.) would be required. Similar to the proposed Project, all stormwater generated during construction would continue to be directed to the existing storm drain system and all elements of this alternative would be required to comply with the Construction General Permit (SWRCB Order No. 2009-0006-Data Quality Assessment). Implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize

the potential for contributing polluted runoff. Therefore, construction-related impacts to water quality standards, waste discharge requirements, and the municipal storm drain system would be reduced compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Following demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, the No Project Alternative would redevelop the Project site with turf landscaping within the general footprint of these buildings. The existing surface parking lots on-site would remain. While installation of the turf landscaping would increase pervious area on-site as compared to existing conditions, the No Project Alternative would result in a smaller area of pervious surfaces as compared to the proposed Project. Additionally, the No Project Alternative would not involve construction of an infiltration system on-site, which would reduce runoff from the Project site as described for the proposed Project (refer to Section 3.9, *Hydrology and Water Quality*). Therefore, this alternative would not provide the same level of beneficial impacts as described for the proposed Project.

Land Use and Planning

BCHD would not renew, or would terminate, its leases with existing tenants and would begin demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, as needed. Following the completion of demolition activities, the existing footprints of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would be landscaped with turf. Implementation of the No Project Alternative would not conflict with applicable land use plans, policies, and regulations, including SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; Connect SoCal), Los Angeles County Metropolitan Transportation Authority's (Metro's) 2020 Long Range Transportation Plan (LRTP), South Bay Bicycle Master Plan, Redondo Beach and Torrance General Plans, and municipal code development standards.

Noise

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. However, with the exception of demolition, limited grading, and installation of turf landscaping and limited hardscaping, no additional construction activities would be required. Therefore, construction noise associated with this

alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program.

Following the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building, stationary source noise from these buildings would be eliminated. The vehicle trips associated with these facilities would also be eliminated. Therefore, operational noise at the Project site would be limited to parking lot and vehicle noise associated with vehicle trips to the Providence Little Company of Mary Medical Institute Building and open space landscaped turf area. Therefore, operational noise associated with the campus would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Population and Housing

As previously described, implementation of the No Project Alternative would require the demolition of the Beach Cities Health Center within the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. At this point, the population associated with these buildings would be eliminated and the total population at the campus would be limited to employees and medical patients at the Providence Little Company of Mary Medical Institute Building. Similar to the proposed Project, demolition activities and the installation of turf landscaping would generate a minor and temporary increase in employment; however, given the limited scope and duration of the demolition and landscaping activities under this alternative, the number of construction workers required would be reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program. Following the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, the No Project Alternative would not generate any new employment or population growth. Therefore, the No Project Alternative would result in a net reduction in population and employment as compared to existing conditions and would displace 60 Memory Care units (120 beds).

Public Services

The No Project Alternative would result in a long-term net reduction in population and employment as compared to existing conditions due to the eventual vacation and demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. As a result, implementation of the No Project Alternative would incrementally decrease the demand for fire protection emergency medical services (EMS) provided by Redondo Beach Fire Department

(RBFD) and as well as police protection services provided by the Redondo Beach Police Department (RBPD). Similar to the proposed Project, the No Project Alternative would not result in an increase enrollment within the Redondo Beach Union School District or the Torrance Union School District and would not result in an increased need for library services, resources, and facilities. Therefore, this alternative would have no potential to impact public schools, parks and recreational facilities, or libraries. Additionally, the development of publicly accessible passive open space would result in a beneficial impact to recreational facilities; however, unlike the proposed Project, this alternative would not provide active open space to accommodate programs that meet community health and wellness needs.

Transportation

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. However, with the exception of demolition, limited grading, and installation of turf landscaping and hardscaping, no additional construction activities would be required. Accordingly, construction-related haul truck trips would be limited to export of demolition debris associated with the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, import of clean backfill soil, and import of concrete for the hardscape improvements. Construction-related haul truck trips would be reduced from 9,544 total trips associated with Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*) to approximately 3,409 truck trips under the No Project Alternative (see Table 5.5-1).

**Table 5.5-1. Estimated Number of Haul Truck Trips Under the No Project Alternative**

| | Number of Haul Truck Trips |
|---|---|
| ***Export*** | |
| Beach Cities Health Center Demolition Debris | 2,000 |
| Beach Cities Advanced Imaging Building Demolition Debris | 534 |
| ***Import*** | |
| Soil for Backfill of Beach Cities Health Center Basement | 875 |
| **Total Number of Trips** | **3,409** |

Notes: The number of trips calculated for the export of demolition debris from the Beach Cities Advanced Imaging Building was calculated by applying the proportion of demolition debris from the Beach Cities Advanced Imaging Building to the total number of truck trips for export of demolition debris for both the Beach Cities Advanced Imaging Building and above ground parking garage. Export of demolition debris from the Beach Cities Advanced Imaging Building would constitute approximately 55 percent of the 972 total trips estimated for export of both the Beach Cities Advanced Imaging Building and above ground parking garage.

As previously described, the No Project Alternative would result in a long-term net reduction in population and employment as compared to existing conditions due to the eventual vacation and demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. Following demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building, operational vehicle trips associated with these buildings would be eliminated. Operational vehicle trips to the Project site would be limited to those associated with the Providence Little Company of Mary Medical Institute Building and passive open space on-site. Therefore, the No Project Alternative would substantially reduce the number of operational vehicle trips and associated VMT as compared to the proposed Project.

The No Project Alternative would result in no conflicts with transportation plans, policies, or regulations, no transportation design hazards, and no effects on emergency access to the Project site.

Utilities and Service Systems

Implementation of the No Project Alternative would require the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. At that point, BCHD would not renew, or would terminate, its leases with existing tenants and would begin demolition of the facilities, as needed. Construction-related impacts associated with the No Project Alternative would include temporary water use for dust control, equipment cleaning, and re-compaction and grading activities and disposal of demolition debris. Temporary impacts related to construction would occur for a period of at least 1 month during the demolition of the Beach Cities Health Center and at least 3 months for the Beach Cities Advanced Imaging Building. Given the limited scope and duration of construction for the No Project Alternative, construction-related impacts to utilities would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Following the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building, water demand, wastewater generation, and solid waste generation from these buildings would be eliminated. Accordingly, the No Project Alternative would substantially reduce demand on existing utilities at the campus as compared to existing conditions as well as the proposed Project (see Table 5.5-2).

**Table 5.5-2. Estimated Project Site Water Demand Comparison for Existing, No Project Alternative, and Proposed Project Conditions**

| | Water Demand (gal/year) | Wastewater Generation (gpd) | Solid Waste Generation (tons/year) |
|---|---|---|---|
| Existing Project Site | 39,231,667 | 68,925 | 330.22 |
| Proposed Project | 56,426,355 | 116,286 | 660.51 |
| No Project Alternative | 8,868,944 | 11,925 | 13.32 |

Notes: gal/year = gallons per year; gpd = gallons per day
Water demand for the No Project Alternative includes water demand of the Providence Little Company of Mary Medical Institute Building and irrigation demand for the turf landscaping. Water demand estimates for irrigation demand are based on the water generation factor used for the proposed Project (Redondo Beach Water Front Project Water Supply Assessment). The area of landscaping was conservatively assumed as equal to the floor area of the Beach Cities Health Center (i.e., 158,000 sf).
The Proposed Project represents total buildout of the Phase 2 development program.
Source: John Labib & Associates 2020 (see Appendix H).

Achievement of Project Objectives

The implementation of the No Project Alternative would eventually eliminate seismic safety and other hazards on the campus (Project Objective 1). However, continued operation and eventual demolition of the Beach Cities Health Center would not generate revenue through mission-derived services to support the current level of BCHD programs and services (Project Objective 2), create a modern campus designed to meet the future health needs of residents (Project Objective 5), or address growing future community health needs (Project Objective 6). Rather, the implementation of the No Project Alternative would result in an approximately $2 million reduction in annual funding due to the elimination of tenant-generated revenues from tenants solely within the Beach Cities Health Center. Therefore, the implementation of the No Project Alternative would require a substantial reduction in the level of BCHD programs and services, and would not meet BCHD's mission to *"enhance community health through partnerships, programs, and services for people who live and work in Hermosa Beach, Manhattan Beach, and Redondo Beach."* Further, the No Project Alternative would eliminate the revenue-generating uses that would allow BCHD to provide intergenerational programs and shared gathering spaces (Project Objective 4). While implementation of the No Project Alternative would redevelop the footprint of the Beach Cities Health Center with simple turf landscaping and limit hardscaping following building demolition, this area would not provide sufficient active open space to accommodate programs that meet community health program and service needs (Project Objective 3). Overall, the No Project Alternative would achieve only one of the Project Objectives.

### 5.5.2 Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus

The demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to

provide community health and wellness services, undermining its mission as a California Healthcare District. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017, which states:

> *"It is the policy of the Board of Directors of the Beach Cities Health District ("District") to establish guidelines that will insure that the District maintains an Unrestricted Fund Balance generated from rent proceeds, taxes and investment income in an amount sufficient to insure sources of funding for operating the District Services focused on preventive health-related services and programs provided to the three beach cities, including the publicly-owned health facilities known as the Center for Health & Fitness and Adventure Plex. In addition for prudent long term management of District assets, it is further the policy of the Board of Directors to maintain a Committed Fund Balance to be used for continued capital investments in the District."*

Under this alternative BCHD would not renew, or would terminate, existing leases with tenants occupying the Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building. BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities the existing campus, but would instead divest itself of the existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide community health and wellness programs and services. As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis* it is not anticipated that BCHD would be able to find a property that would allow for the complete off-site development of the proposed Healthy Living Campus; however, BCHD could make investments in smaller properties ~~to~~ that could support some of these uses. Following the sale of the campus, its future redevelopment remains highly speculative. The range of potential likely development scenarios is discussed below.

Given the land use designation and zoning (P-CF) of the existing campus, permitted future uses for the site include recreational facilities and open space and accessory use/structures (e.g., storage shed, maintenance building, concession stands, etc.) pursuant to RBMC Section 10-2.1110. It is highly unlikely that the campus would be developed as a recreational facility unless it is acquired by the City of Redondo Beach or the City of Torrance. Other uses permitted on the campus subject to approval of a Conditional Use Permit (CUP) by the City of Redondo Beach include but are not

limited to public buildings in recreation areas, agricultural and horticultural uses, child day care centers, community centers, cultural institutions, government offices and maintenance facilities, public gymnasiums and athletic clubs, and performance art facilities. Building setbacks, heights, and densities (i.e., floor area ratio [FAR]) in the P-CF zone are unrestricted, but are subject to Planning Commission Design Review (RBMC Section 10-2.1116).

The vacant Flagler Lot, zoned C-2 (Commercial), would permit commercial uses such as animal feed and supplies, artist's studios, banks and savings and loans, commercial printing, food and beverage sales, maintenance and repair services, recycling collection facilities, restaurants, and government offices. Other uses permitted on the vacant Flagler Lot subject to approval of a CUP by the City of Redondo Beach include but are not limited to ambulance services, bars and cocktail lounges, body art studios, building material sales, business and trade schools, hotels and motels, laboratories, liquor stores, massage businesses, mortuaries, vehicle sales and services, churches, adult day care centers, and senior housing (RBMC Section 10-2.620). Building heights on C-2 properties are restricted to two stories (30 feet) or less and the FAR shall not exceed 0.5 (RBMC Section 10-2.622).

Alternatively, a developer could apply for a zoning change for the campus and/or the vacant Flagler Lot. However, pursuant to Measure DD, which was approved in 2008, any such zoning changes by the City of Redondo Beach would require a public vote. If the zoning change were to be successful, the campus and/or the vacant Flagler Lot could be redeveloped as mixed-used multi-family housing that would help the City of Redondo Beach to meet the SCAG's allocation of 1,397 housing units within the City for the 2014-2021 Regional Housing Needs Assessment (RHNA) planned period (refer to Section 3.12, *Population and Housing*).

Construction and Operational Impacts

Given the speculative nature of the redevelopment under this alternative, potential environmental impacts are described generally and qualitatively as compared to the proposed Project. Future development involving discretionary actions by the City of Redondo Beach would require the preparation of a CEQA-compliant environmental document that would analyze the construction-related and operational impacts of the redevelopment.

Given the age and seismic safety hazards as well as the configuration of the Beach Cities Health Center (former South Bay Hospital originally developed in 1958), it can reasonably be assumed that this building would be demolished following sale of the campus. Demolition of the Beach Cities Health Center would likely occur as described for the Phase 1 preliminary site development plan (refer to Section 2.5.1.6, *Construction Activities*). Demolition activities would occur over a

1-month period and would generate approximately 32,000 cy of demolition debris – including structural steel, wood, glass, flooring, and utility material such as pipes and cables – which would be exported from the Project site in approximately 2,000 haul truck trips. Following the completion of demolition activities, the existing basement would be filled with approximately 14,000 cy of soil imported to the Project site in 875 truck trips over a period of 1 month.

Depending on the whether the campus is subdivided prior to its sale, the demolition of the Beach Cities Advanced Imaging Building and Providence Little Company of Mary Medical Institute Building may also be desired or required to support redevelopment.

Demolition activities would require the use of typical construction equipment, including an excavator, bulldozers, backhoes, and excavators to break up and remove existing asphalt, concrete, and building materials. A high-reach excavator would be used along with a variety of attachments (e.g., shears, crushers, and hydraulic hammers) to dismantle the structure to avoid flying debris and minimize dust and noise. Haul trucks would be used to export large amounts of debris to a mixed C&D debris recycling facility approved by the City of Redondo Beach pursuant to a Construction & Demolition Waste Management Plan. Where needed, any existing hazardous materials found during the demolished buildings (i.e., ACM, LBP, PCBs) or soil vapor contamination (i.e., PCE) would be properly handled and disposed of in accordance with regulatory requirements.

Following the completion of demolition activities, the scale and duration of construction activities under this alternative would be dependent upon a specific proposal for redevelopment. For example, if one or both of the parcels were rezoned for residential use, a mixed-use housing development may result in shorter buildings with a larger developed footprint (i.e., reduced open space as compared to the proposed Project). Alternatively, a mixed-use housing development could result in buildings that are taller than what is currently proposed under the Phase 1 preliminary site development plan as well as the Phase 2 development program. Regardless, based on the size of the Project site, it is reasonable to assume that construction activities would occur for a period of between 1 and 3 years, and potentially more depending on the height and density of development. Therefore, construction-related impacts to criteria air pollutant and GHG emissions, noise, and construction traffic associated with this alternative would generally be comparable with the impacts described for the proposed Project. This alternative would also result in ground disturbance involving potential soil erosion and impacts due to soil vapor contamination and hazardous materials at the Project site.

Depending upon the type of uses that would be developed on the campus and the vacant Flagler Lot (e.g., mixed-use housing), this alternative could also result in substantial increases in operational impacts associated with criteria air pollutant and GHG emissions, noise, and VMT, and increased demand for public services (e.g., police and fire protection, parks, libraries), and utilities (e.g., water, wastewater, etc.).

Relationship of Alternative to Project Objectives

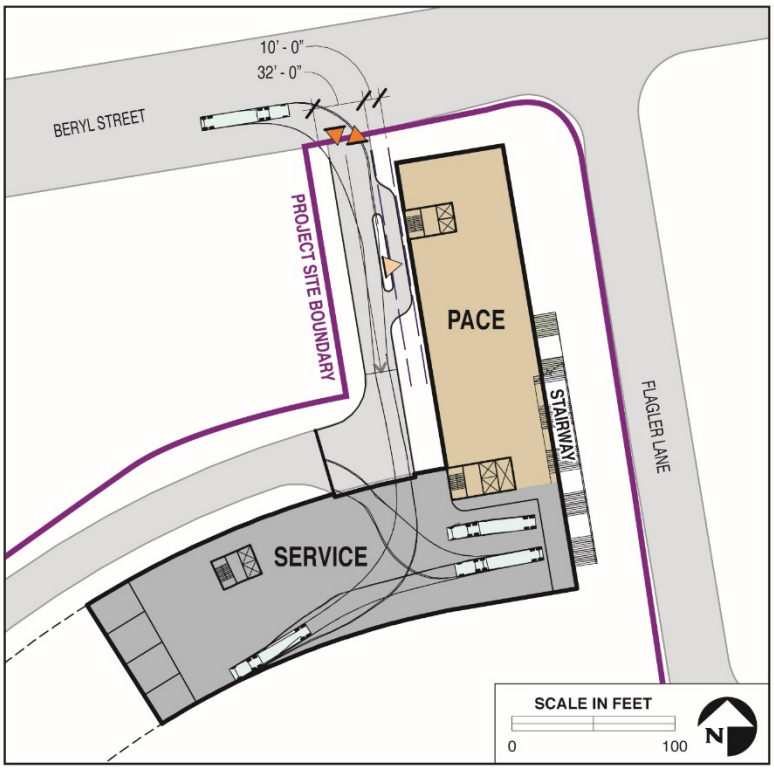
Implementation of this alternative would not include any of BCHD's existing programs and services (e.g., Community Services, CHF, and Memory Care) or community programs and services included in the proposed Project (e.g., Assisted Living, Youth Wellness Center, Wellness Pavilion, Aquatics Center). Therefore, this alternative use would not support Project Objectives to provide intergenerational programs, shared gathering spaces, and facilities integrated with the broader community, or BCHD's mission to meet future community health needs.

Although BCHD owns or leases other small properties within the Beach Cities, the Beach Cities Health Center is BCHD's largest block of medical office building space and provides a substantial portion of BCHD's overall revenue used for community health and wellness program and services. While the one-time influx of capital would be used by BCHD to invest in another property or properties off-site to generate funds required to provide community health and wellness services, closure of the Beach Cities Health Center would eliminate a significant portion BCHD's annual funding for community health and wellness services and many of these programs and services would be reduced or eliminated. Implementation of this alternative would not support BCHD's mission to *"enhance community health through partnerships, programs, and services focused on people who live and work in Redondo Beach, Hermosa Beach, and Manhattan Beach, but with many services available to residents from nearby cities and throughout the South Bay."* Further, this alternative would not involve the addition of public open space to accommodate programs that meet community health needs, provide Assisted Living units with intergenerational programs and shared gathering spaces, create a modern campus that meets the future health needs of residents, or generate sufficient revenue to continue the current level of BCHD programs and services. Therefore, this alternative only meets one of the Project Objectives and generally does not meet BCHD's mission as a California Health District.

### 5.5.3 Alternative 3 – Revised Access and Circulation

The Revised Access and Circulation Alternative (Alternative 3) would involve implementation of the development of the proposed BCHD Healthy Living Campus Master Plan in two phases, with the same uses described in the Phase 1 preliminary site development Plan and the more general

Phase 2 development program. However, this alternative would include a revised access and circulation design in Phase 1 to address concerns raised by the City of Torrance and the residents of the Torrance neighborhood to the east of the Project site related to the proposed vehicle access along Flagler Lane. For example, as described in Section 3.10, *Land Use and Planning*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. The City of Torrance is also considering the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. Accordingly, this alternative reconfigures the proposed entries/exits along Flagler Lane.

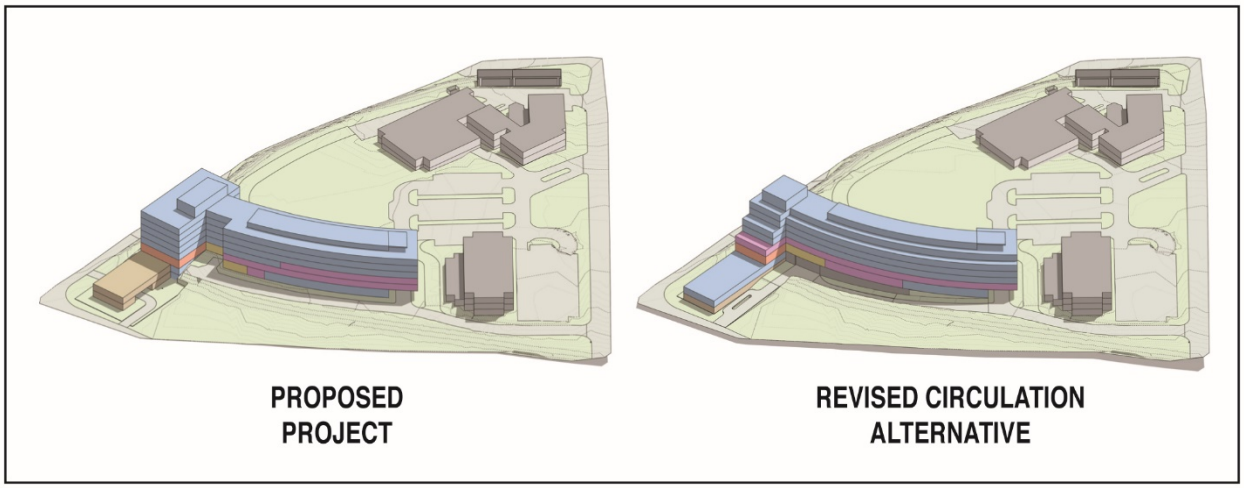



Under Alternative 3, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane would be removed and the one-way driveway would be reconfigured. Under Alternative 3, the one-way driveway and passenger pick-up/drop-off zone would be located immediately adjacent to the west of the RCFE Building. Access to the subterranean service area and loading dock beneath the RCFE Building would also be provided immediately adjacent to the west of the RCFE Building. Vehicles picking up or dropping off at the RCFE Building or service vehicles exiting the RCFE Building would continue along a new, paved, internal access road that follows the northern perimeter of the Project site. Vehicles traveling along this one-way perimeter road would continue straight and exit the Project site onto northbound North Prospect Avenue (see Figure 5-1).

The primary entrance to the campus (i.e., the entrance access to long-term parking on campus) would continue to be provided off of North Prospect Avenue. The main entrance to the campus would be located at the signalized driveway intersection with North Prospect Avenue, approximately 275 feet to the northwest of the intersection of North Prospect Avenue & Diamond Street. This main entrance would continue to provide access to the surface parking lot and subterranean parking garage serving the Providence Little Company of Mary Medical Institute Building. The main entrance would also provide access to the new surface parking lot located within the footprint of the existing Beach Cities Health Center. A secondary driveway would be located approximately 100 feet northwest of the intersection of North Prospect Avenue and Diamond Street, and would provide access to the parking structure located at 512 North Prospect Avenue (see Figure 5-1).

As described for the proposed Project, Alternative 3 would provide 157 Assisted Living units and 60 replacement Memory Care units. The RCFE Building would also include space for PACE, Community Services, and the Youth Wellness Center as generally described for the proposed Project. However, the configuration of the new vehicle entrance and northern perimeter road would displace the proposed grass-crete secondary emergency access to the north of the RCFE Building resulting in an overall reduction in ground level open space.

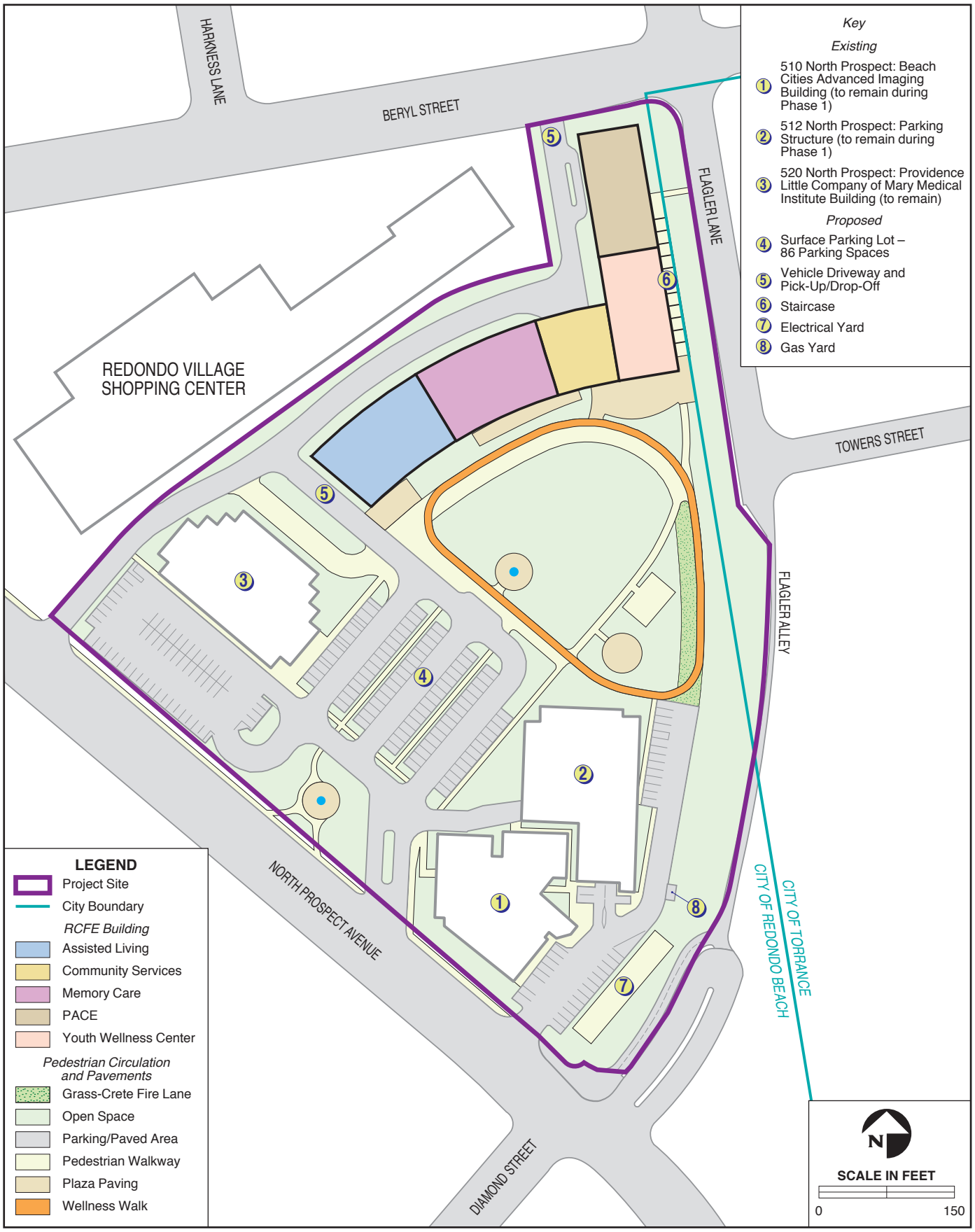
While the maximum roof height of the RCFE Building would remain the same as for the proposed Project (i.e., approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below), the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As such, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to further minimize the RCFE Building's perceived height from the pedestrian perspective at street level.




The Phase 2 development program would be the same as the proposed Project. Construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). The proposed programs and operational activities also would be the same as those described for Phase 1 and Phase 2 of the proposed Project.

Aesthetics and Visual Resources

Under Phase 1 of Alternative 3, impacts to aesthetics and visual resources would be similar, but reduced compared to those described for the proposed Project. For example, the maximum roof height of the RCFE Building in Phase 1 would remain at 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below as described for the proposed Project. However, the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As a result, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the RCFE Building's perceived height from the pedestrian perspective at street level (e.g., Representative View 3). However, given that the maximum roof height of the RCFE Building, Alternative 3 would still result in potentially significant impacts resulting from the interruption of views of the ridgeline of the Palos Verdes hills from the highpoint of 190$^{th}$ Street & Flagler Lane (i.e., Representative View 6). As described for the proposed Project, MM VIS-1 would require a reduction in the height of the RCFE Building such that it would no longer interrupt this ridgeline. Therefore, impacts to this scenic vista would be *less than significant with mitigation*, as described for the proposed Project.




wood.

**Revised Circulation Alternative**

**FIGURE 5-1**

Implementation of the Phase 2 development program under Alternative 3 would be the same as Phase 2 of the proposed Project. As described for the proposed Project, the heights of the proposed building(s) under the Phase 2 development program would be up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below, depending upon the final site plan. Following implementation of the Phase 2 development program, views across the Project site from North Prospect Avenue (i.e., Representative View 2) would be obstructed by the proposed building(s) and parking structure. However, as with the proposed Project, the proposed development would meet the development standards described in Redondo Beach General Plan and municipal code. Therefore, similar to the proposed Project, impacts to existing visual character and quality of the site and surrounding areas under Alternative 3 would be *less than significant*.

Alternative 3 would remove the one-way driveway exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane as described under the proposed Project. Rather than exit onto Flagler Lane, the proposed one-way driveway under Alternative 3 would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Therefore, Alternative 3 would eliminate vehicle traffic onto Flagler Lane and would completely eliminate the less than significant light impacts from vehicle headlights shining towards the Torrance neighborhood east of Flagler Lane.

Given that the maximum roof heights of the proposed buildings under Alternative 3 would remain the same as for the proposed Project, impacts to shade and shadow would remain similar. The step backs on the proposed RCFE Building would incrementally reduce shading on the Torrance neighborhood to the east, Towers Elementary School, and the multi-family residences north of Beryl Street. As with the proposed Project, implementation of the Phase 1 preliminary site development plan and the Phase 2 development program under this alternative would incrementally increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, this shading would occur only in the evenings (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter). Therefore, impacts to shading from Alternative 3 would be *less than significant*.

<u>Air Quality</u>

*Construction Emissions*

Construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Therefore, construction-related impacts to air quality would also be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section

3.2, *Air Quality*). For example, peak daily construction emissions would remain below the SCAQMD thresholds of significance as described for the proposed Project. Similar to the proposed Project, on-site construction emissions would exceed LSTs for $PM_{10}$ and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph, and would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD LSTs (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*. Additionally, as described for the proposed Project, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions from combustion by 79 to 94 percent. With the use of Tier 4 engines, DPM emissions anticipated during Phase 1 construction of Alternative 3 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 3 would be the same as those described for the proposed Project and would be *less than significant with mitigation*.

*Operational Emissions*

The proposed programs and operational activities would be the same as those described for Phase 1 and Phase 2 of the proposed Project. Additionally, operational vehicle trips and VMT anticipated under Alternative 3 would be the same as those described for the proposed Project. Therefore, operational emissions generated by Alternative 3 – including vehicle trips, electricity and natural gas consumption, and landscaping maintenance – would be to the same as those described for Phase 1 and Phase 2 of the proposed Project. Under Alternative 3, operational air pollutant emissions would continue to be below the SCAQMD mass daily thresholds and LSTs for all air pollutants. Additionally, operation of proposed development under Alternative 3 would not release substantial amounts of toxic air contaminants (TACs), and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from off-site. Therefore, under Alternative 3, operational air pollutant emissions would be the same as the proposed Project, and would be *less than significant*.

As discussed in Section 3.2, *Air Quality*, the proposed Project would contribute to cumulative traffic in the area and would increase carbon monoxide (CO) levels at nearby intersections, but would not exceed CO thresholds. Similar to the proposed Project, increases in CO emissions associated with this alternative would not cause an exceedance of the Federal or State CO standards and CO hotspot impacts would be *less than significant*.

Additionally, this alternative would include the same uses as described for the proposed Project and would also not result in objectionable odor impacts. Therefore, similar to the proposed Project, impacts related to odors under Alternative 3 would be *less than significant*.

Biological Resources

As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Accordingly, implementation of Alternative 3 would result in the removal of existing landscaped trees, shrubs, and other ground cover that may provide nesting and roosting habitat for migratory birds, including Cooper's hawk (*Accipiter cooperii*). Vegetation removal during Phase 1 development would include landscaped trees along Diamond Street, Flagler Alley, and Flagler Lane within the jurisdiction of the City of Torrance as well as in the northern area of the Project site to provide space for the proposed footprint of the proposed RCFE Building. Implementation of the Phase 2 development program would also require the removal of vegetation within the interior of the existing campus. All vegetation removal would occur in compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1 and Phase 2 of Alternative 3. The proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant* as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 3 would result in the same impacts to historical resources as described for the proposed Project. Phase 1 of Alternative 3 would involve the demolition of the existing Beach Cities Health Center and the attached maintenance building, which are both historic-period structures that are more than 50 years old; however, the Historical Resources Assessment prepared for the campus in 2018 determined that these buildings did not meet any of the

criteria for listing as a historic resource in the California Register of Historical Resources (CRHR) or designation as a local landmark under the Redondo Beach Historic Ordinance (Ord. No. 2554) (refer to Section 3.4, *Cultural Resources and Tribal Cultural Resources*). The other existing structures on the Project site were constructed in 1976 and 1989 and because they are less than 50 years old they are not eligible for listing on the CRHR. Therefore, the demolition of the Beach Cities Health Center and the attached maintenance building under Alternative 3 would not result in a significant impact to historic built resources under the criteria set forth in CEQA Section 15064.5b(3). Further, as described for the proposed Project, implementation of Alternative 3 would not physically damage or substantially change the existing land use or historic context of any historic structures, including the Morell House and the Queen Anne House located 0.12 miles to the north of the Project site. Therefore, potential impacts to historic structures associated with the Phase 1 preliminary site development plan and Phase 2 development program of Alternative 3 would be *less than significant*, as described for the proposed Project.

Potential impacts to previously unidentified archaeological and paleontological resources, human remains, and tribal cultural resources under this alternative would also be similar to those under the proposed Project. Construction activities, including ground disturbing activities (e.g., excavation, trenching, grading, etc.), under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). For example, Phase 1 would begin with the demolition of the existing surface parking lot and associated perimeter circulation road located at the northern edge of the Project site. Subsequent construction of the RCFE Building in Phase 1 would begin with a 26-foot-deep excavation for the subterranean service area and loading dock. Phase 1 construction would also include extensive trenching for installation of utilities, grading to level the site, and demolition of the Beach Cities Health Center and the attached maintenance building. Ground disturbing construction activities associated with the Phase 2 development program would include demolition of the existing above ground parking structure and Beach Cities Advanced Imaging Building, excavation of approximately 11,000 cy of soil, and grading. Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 in Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1a and -1b ~~and~~ as well as MM CUL-2 would also apply to this alternative and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown archaeological resources, human remains, and tribal cultural resources to *less than significant with mitigation*.

Energy

As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). As such, construction of Alternative 3 would require the same amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for the proposed Project. Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Energy use during construction would generally not result in a substantial increase in on-site electricity consumption and would be substantially less than the ongoing energy use on-site under existing conditions at the campus. Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. Similar to the proposed Project, Alternative 3 would require approximately 1,910,839 gallons of construction fuel, which would represent a very small fraction – less than 1 percent – of Los Angeles County's total annual fuel consumption. Overall energy impacts related to construction of Alternative 3 would be *less than significant*, as described for the proposed Project.

While operation of Alternative 3 would result in the daily consumption of vehicle fuel for trips, Alternative 3 would support sustainable mobility options by locating residential, medical office, office, gym, and restaurant land uses at an infill location close to existing off-site commercial, retail, and recreation (e.g., Dominguez Park) destinations as described for the proposed Project. Additionally, the Project site is close to several stops along Beach Cities Transit Line 102 and would include bicycle parking spaces, lockers, and showers to encourage employees and visitors to use alternative modes of transportation such as bicycling. Therefore, Alternative 3 would not cause wasteful, inefficient, or unnecessary use of transportation energy and impacts would be *less than significant*, as described for the proposed Project.

As described for the proposed Project, operation of Alternative 3 would decrease electricity demand following buildout of the Phase 1 preliminary site development plan and permanently increase the electricity demand following buildout of the Phase 2 development program as compared to existing conditions. The natural gas demand for operation of Alternative 3 would also increase as compared to existing conditions. However, Alternative 3 would incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, energy-efficient HVAC systems, high-performance

insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). New buildings would also meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment of Alternative 3 to renewable energy supplies and ensures that operation of Alternative 3 would not use energy in a wasteful or inefficient manner and impacts would be *less than significant*, as described for the proposed Project.

Similar to the proposed Project, Alternative 3 would support the energy conservation and GHG reduction goals and policies established in the Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as the Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 3 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

Geology and Soils

Impacts related to geological resources and paleontological resources under Alternative 3 would be the same as those described under the proposed Project as geological impacts are generally site-specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section, 3.6, *Geology and Soils*. As with the proposed Project, implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the Uniform Building Code (UBC), California Building Code (CBC), RBMC, and TMC would address geologic hazards under this alternative. As with the proposed Project, mitigation and compliance with regulatory conditions would reduce impacts to geology and soils under Alternative 3 to *less than significant with mitigation*.

Additionally, given that this alternative would result in the same area and depth of ground disturbance as the proposed Project, impacts to paleontological resources would be the same (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited

in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources under this alternative would be *less than significant with mitigation*, as described for the proposed Project.

Greenhouse Gas Emissions and Climate Change

Impacts related to GHG emissions and climate change under Alternative 3 would be the same as those described for the proposed Project. Given that the construction activities and the proposed programs and operational activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project, GHG emissions anticipated under Alternative 3 would be the same as those estimated for the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions and Climate Change*). Further, because this alternative would include the uses as well as the same sustainability features as the proposed Project, impacts related to conflicts with plans and policies related to reduction in GHG emissions would be the same as those identified in Impact GHG-1 for the proposed Project and would be *less than significant*.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 3 would be the same as those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition and excavation. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation of the Phase 1 preliminary site development plan and demolition of above ground parking garage and potentially the Beach Cities Advanced Imaging Building during implementation of the Phase 2 development program (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). As described for the proposed Project, Alternative 3 would provide a subterranean service area and loading dock below the Project site in Phase 1 as well as the potential for subterranean parking depending upon the Phase 2 development program option. As such, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform) would be similar (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Overall, impacts with regard to hazards and hazardous materials under this alternative would be similar to those described under the proposed Project. As such, MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols following discovery of contamination, soils management plan, soil vapor monitoring,

and enrollment in the California Geologic Energy Management Division's (CalGEM's) Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*, as describe for the proposed Project.

Hydrology and Water Quality

*Construction*

Construction-related impacts related to hydrology and water quality under Alternative 3 would be the same as those described for the proposed Project. As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). As with the proposed Project, construction of Alternative 3 would involve major earthwork, including excavation and shoring for subterranean levels, grading, and trenching for utilities, which would disturb the underlying soils and expose them to potential erosion and sediment transport into adjacent storm drain inlets – particularly during storm events or during on-site watering. This stormwater runoff could also contain eroded C&D debris and associated hazardous materials that would potentially further degrade surface water quality in the vicinity of the Project site, including the Santa Monica Bay. Potential adverse effects on water quality associated with Alternative 3 would be reduced through compliance with the requirements of the Construction General Permit (SWRCB Order No. 2009-0006-Data Quality Assessment). Implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of Alternative 3. Therefore, construction-related impacts to water quality would be *less than significant*, as described for the proposed Project.

Similar to the proposed Project, Alternative 3 would include excavation to a maximum depth of 26 feet below ground surface (bgs) for the subterranean service area and loading dock of the RCFE Building during Phase 1 as well as the subterranean levels of the proposed parking structure depending upon the Phase 2 development program option. Given that the depth to groundwater at the Project site is greater than 61.5 feet bgs, dewatering activities would not be required. Additionally, construction activities associated with Alternative 3 (e.g., equipment cleaning, dust control, and production of concrete) would not substantially deplete groundwater supplies as water demand would be nominal and less than the existing water demand occurring on-site. Therefore, construction impacts to groundwater levels would be *less than significant*, as described for the proposed Project.

*Operation*

As described for the proposed Project, implementation of Alternative 3 would improve water quality and groundwater recharge by reducing the volume of runoff and improving infiltration at the Project site. Alternative 3 would develop impervious surfaces that are relatively similar in type to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). Alternative 3 would require the construction of a paved perimeter access road, which would displace the proposed grass-crete and incrementally increase impervious surfaces compared to the proposed Project (refer to Figure 5-1). Nevertheless, Alternative 3 would still result in a net reduction in the total amount impervious surface area compared to existing conditions and would reduce the potential for pollutants to become exposed during storm events. The reduction in the amount of impervious surfaces on-site and compliance with all applicable State and local regulations, such as the Redondo Beach Stormwater Management and Discharge Control Ordinance, would ensure that operational impacts to water quality would be *less than significant.* Further, implementation of Alternative 3 would improve groundwater recharge at the Project site and there would be *no impact* to groundwater quality, as described for the proposed Project.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 3 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85$^{th}$ percentile storm into the groundwater. The existing storm drain infrastructure discharging to the City of Torrance municipal storm drain system at the storm drain line beneath Flagler Lane would be abandoned in place. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of Alternative 3. Therefore, as described for the proposed Project, Alternative 3 would have a *less than significant* impact on drainage capacity in the vicinity of the Project site.

Similar to the proposed Project, Alternative 3 would be required to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Alternative 3 would also implement BMPs, such as sediment and erosion controls, to prevent polluted discharge or runoff that would adversely affect water quality. Therefore, through compliance with the NPDES program, Alternative 3 would be consistent with the California Ocean Plan (Ocean Plan) and the Water Quality Control Plan for the Los Angeles Basin (Basin Plan). Additionally, Alternative 3 would support objectives of the Groundwater Basin Master Plan (GBMP) by increasing the area of impervious surfaces and associated infiltration on the Project site. Since Alternative 3 would generate the same amount of water demand as the proposed Project,

implementation of Alternative 3 would not increase water demand to a level beyond what can be adequately met by existing and future water supplies as described for the proposed Project. Therefore, Alternative 3 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 Urban Water Management Plan [UWMP]) and impacts would be *less than significant*.

Land Use and Planning

As previously described, Alternative 3 would include an alternative access and circulation design in Phase 1, which would remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane. This would remove the need for a grading or building permit from the City of Torrance. (Landscape plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Under Alternative 3, the one-way driveway would be reconfigured with entry provided via a right-turn along Beryl Street, located immediately adjacent to the west of the RCFE Building. Rather than exit onto Flagler Lane, the proposed one-way driveway would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. As described in Section 3.10, *Land Use and Planning*, TMC Section 92.30.8 prohibits site access to commercial properties from local streets when access from an arterial road is available. Additionally, the City of Torrance is also considering the potential removal of the southbound traffic along Flagler Lane between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. Implementation of Alternative 3 would remove vehicle access from Flagler Lane within the City of Torrance and therefore, would be consistent with TMC Section 92.30.8. Alternative 3 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 3 would be *less than significant*.

Noise

*Construction*

Under Alternative 3, impacts related to construction noise would be the same as those described for the proposed Project. The maximum roof height of the RCFE Building in Phase 1 would 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below, as described for the proposed Project. Additionally, the proposed building(s) under the Phase 2 development program would be up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below, depending upon final site plan. As described for the proposed Project,

construction activities would result in increased noise levels that would impact surrounding noise-sensitive receptors. The necessary noise barrier heights required to mitigate the noise from construction activities above 30 feet are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Compliance with existing local noise regulations along with the implementation of MM NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. However, *significant and unavoidable* noise impacts would occur throughout the duration of the proposed construction activities.

Similar to the proposed Project, ground-borne vibration would be generated from the use of heavy construction equipment at the Project site, which could potentially expose existing sensitive land uses in the vicinity to excessive vibration. However, vibration levels as described for the proposed Project, these impacts would be *less than significant*.

*Operation*

Under Alternative 3, impacts related to operational vehicle noise would be similar to, but less severe than under the proposed Project. Under this alternative, the one-way driveway and pick-up/drop-off loading zone would be located immediately adjacent to the west of the RCFE Building and would be reconfigured, with entry provided via a right-turn along Beryl Street. Rather than exit onto Flagler Lane, the proposed one-way driveway under Alternative 3 would lead to a drop-off/pick-up zone as well as access to a subterranean service area and loading dock beneath the RCFE Building. As a result, Alternative 3 would further reduce less than significant operational noise levels at nearby sensitive receptors from vehicles exiting the one-way driveway onto Flagler Lane (refer to Impact NOI-3 in Section 3.11, *Noise*). Alternative 3 would also further reduce less than significant noise levels at nearby sensitive receptors from trash pick-up and delivery operations, including compacting operations and travel along Flagler Lane.

Long-term operational noise impacts from HVAC equipment, parking operations, and on-site noise activities associated with Alternative 3 (i.e., outdoor seating, fitness classes, amplified music, etc.) would be the same as those described for the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*). Therefore, impacts related to operational noise under Alternative 3 would be reduced compared to the proposed Project and *less than significant with mitigation*.

<u>Population and Housing</u>

Impacts related to population and housing under Alternative 3 would be the same as those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. As described for the proposed Project, Alternative 3 would provide 157 Assisted Living units and

60 replacement Memory Care units for a total of 217 residential units. Assuming 100 percent occupancy of the 157 new Assisted Living units (177 new permanent residents) and that none of the Assisted Living residents would come from the existing population of Redondo Beach, implementation of Alternative 3 would increase the population of the Redondo Beach by less than 1 percent (0.3 percent increase); therefore, the maximum population increase would be negligible. This minor increase in population would be consistent with and well within SCAG's growth projections. Increases in employment under Alternative 3 would also be similar to the proposed Project. Since the Project site is already served by existing roads and infrastructure, Alternative 3 would not require the creation of new roads or other infrastructure that would induce new development and population growth beyond this alternative. Local job availability would be expected to increase negligibly by approximately 170 jobs (0.5 percent), in line with SCAG growth projections. Employment opportunities would likely be filled by members of the local and regional labor force. Potential increases in the low- and moderate-income work force within Redondo Beach could incrementally increase demand for affordable housing within the City; however, it is expected that most employees would live in surrounding nearby cities and commute to Redondo Beach, as described for the proposed Project. This impact would be *less than significant* as there is sufficient regional housing availability to meet these demands.

Public Services

Under Alternative 3, impacts to demand for fire protection and EMS provided by RBFD as well as police protection services provided by RBPD would be the same as those described for the proposed Project under Impact PS-1 and Impact PS-2. Alternative 3 – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in an increase in residents, employees, and visitors at the campus, and could incrementally increase the demand for fire protection and EMS services provided by RBFD as well as other non-emergency services as compared to existing conditions at the Project site. However, as described for the proposed Project, the campus would generate a conservative estimate of 244 emergency calls per year, which would constitute approximately 3 percent of the total RBFD responses. Development under Alternative 3 would continue well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the RBFD. As described for the proposed Project, prior to the issuance of Certificates of Occupancy for the development under Phase 1 and Phase 2, BCHD would coordinate with the RBFD and the RBPD to prepare an Emergency Response Plan for the campus. Additionally, the addition of 177 Assisted Living residents to the campus would not substantially alter the existing ratio of police officers to residents. Therefore, environmental impacts resulting from increased demands for fire protection and EMS provided by RBFD as well

as police protection provided by RBPD for Phase 1 and Phase 2 of Alternative 3 would be *less than significant*.

Transportation

*Construction Traffic*

Construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Therefore, construction-related impacts to the transportation network would be the same as those described for Phase 1 and Phase 2 of the proposed Project. For example, as with the proposed Project, construction activities associated with Alternative 3 would result in approximately 5,927 haul truck trips during the 29-month Phase 1 construction period and approximately 3,809 haul truck trips during the 28-month Phase 2 construction period. Construction-related increases in VMT would occur intermittently and would be temporary and short-term in nature. Increased construction traffic on freeways and streets, particularly large haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, particularly on North Prospect Avenue and Beryl Street (refer to Impact T-3 in Section 3.14, *Transportation*). Implementation of MM T-2 would reduce impacts related to construction traffic, associated VMT, and public safety by requiring the preparation of a Construction Traffic and Access Management Plan (refer to Section 3.14, *Transportation*). Therefore, Alternative 3 impacts to transportation during construction would be the same as those described for the proposed Project and *less than significant with mitigation*, as described for the proposed Project.

*Operational Traffic*

Under Alternative 3, the one-way driveway and pick-up/drop-off zone would be reconfigured with entry provided via a right-turn along Beryl Street, located immediately adjacent to the west of the RCFE Building. Rather than exiting onto Flagler Lane, the proposed one-way driveway would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Vehicles traveling along this one-way perimeter road would continue straight and exit the Project site onto northbound North Prospect Avenue (refer to Figure 5-1). As with the proposed Project, implementation of Alternative 3 would generate an increase in vehicle entry into Flagler Lot provided via a right-turn along Beryl Street. The implementation of Alternative 3 could result in an increase in vehicle-bus conflicts associated with stopped buses at the Beach Cities Transit stop and vehicles turning right into the proposed one-way driveway (refer to Impact T-3 in Section

3.14, *Transportation*). Therefore, MM T-3 would require the existing Beach Cities Transit Line 102 bus stop be relocated to the east of the proposed one-way driveway entrance along Beryl Street to avoid the potential for safety hazards associated with transit.

Increased vehicle entry along eastbound Beryl Street could also block, delay, or increase traffic hazards associated with existing pedestrian and bicyclist traffic along the south side of Beryl Street. As described for the proposed Project, the proposed one-way driveway under Alternative 3 would be designed in accordance with applicable RBMC standards, and sight distances would be approved by the Redondo Beach Community Development Department during site plan approval.

As described in Section 3.14, *Transportation*, if the City of Torrance's temporary one-way closure of southbound traffic on Flagler Lane is successful and neighborhood residents support it, the one-way closure could become permanent. Implementation of a permanent closure of southbound traffic on Flagler Lane south of Beryl Street would preclude access for service and delivery vehicles to the subterranean proposed service area and loading dock under the proposed Project. Therefore, under the proposed Project service and delivery vehicles would be required to drive through the Torrance neighborhood to enter the service area and loading dock entrance, which would present a potential conflict associated with cut-through traffic. Under Alternative 3, the alternative access and circulation design would remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane. Service and delivery vehicles would be directed to the reconfigured one-way driveway off of Beryl Street. Therefore, service and delivery vehicles would not require access along Flagler Lane and implementation of the one-way closure of southbound traffic on Flagler Lane would not present a conflict with Alternative 3 associated with cut-through traffic.

*Implementation of MM T-3 would permanently relocate the existing Beach Cities Transit Line 102 bus stop located west of Flagler Lot to the east of the proposed one-way driveway along eastbound Beryl Street.*

Given that the proposed programs and operational activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project, operational vehicle trips and

VMT would also be the same as those described for Phase 1 and Phase 2 of the proposed Project. While not required to mitigate a significant impact, implementation of the recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project (refer to Section 3.14, *Transportation*).

Utilities and Service Systems

*Water Infrastructure and Supply*

As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). As such, construction-related impacts to water infrastructure and supply under Alternative 3 would also be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 3.15.1, *Water Infrastructure and Supply*). Construction-related impacts associated with Alternative 3 would include temporary water use for dust control, equipment cleaning, and re-compaction and grading activities and disposal of demolition debris. As described for the proposed Project, temporary impacts related to construction would occur for a period of approximately 29 months during implementation of the Phase 1 preliminary site plan and 28 months during implementation of the Phase 2 development program. Alternative 3 would connect to California Water Company's (Cal Water's) water supply system with a new 8-inch lateral installed within the Project site, which would connect to the proposed RCFE Building to the 8-inch water line along North Prospect Avenue adjacent to the northwest of the central driveway. No other water lines would be affected by Alternative 3. In addition to the proposed laterals, Alternative 3 may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water). As described for the proposed Project, all work associated with the proposed water lateral would be subject to review and approval by the Redondo Beach Department of Public Works. Alternative 3 impacts on water infrastructure from construction activities would be *less than significant*, as described for the proposed Project.

The existing water flow and pressure at the Project site is adequate to serve Alternative 3 in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water's potable water system has the infrastructure and the capacity to serve Alternative 3. Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the California Public Utilities Commission (CPUC) (Cal Water 2019).

Given that Alternative 3 would result in the same building square footage and uses as the proposed Project, Alternative 3 would be adequately served by Cal Water's existing water entitlements. Additionally, Alternative 3 may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water), as described for the proposed Project. Recycled water could be used for landscape irrigation and architectural water features, water for mechanical cooling towers, and water for toilet flushing in order to reduce overall water demand under Alternative 3. Therefore, Alternative 3 would be consistent with local policies and operational impacts on potable water use would be *less than significant*, as described for the proposed Project.

*Wastewater Collection, Conveyance, and Treatment*

Construction-related impacts to wastewater under Alternative 3 would also be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*). As described for the proposed Project, portable toilets would be provided by a private waste management company during C&D activities under Phase 1 and Phase 2 of Alternative 3, and all waste would be disposed of off-site. No groundwater is anticipated to be encountered and/or discharged to the existing sewer system during construction, including ground disturbing activities such as excavation. Therefore, construction activities would not generate wastewater flows and would not, along with existing and projected wastewater flows, approach the existing capacity of the Joint Water Pollution Control Plant (JWPCP).

Construction impacts would primarily involve trenching on-site to install the new sewer connections to the existing sewer lines along Diamond Street and Beryl Street. Prior to ground disturbance, all proposed work associated with the sewer connections would be subject to review and approval by the Redondo Beach Department of Public Works. (Neither the existing facilities nor the proposed facilities on the campus would discharge wastewater to the City of Torrance sewer system.) All appropriate permits would be obtained, and the construction contractor would be required to notify the Redondo Beach Public Works Department in advance of ground disturbance activities to avoid disruption of sewer service to off-site properties. Similar to the proposed Project, impacts on wastewater infrastructure from construction activities associated with Alternative 3 would be *less than significant.*

Given that Alternative 3 would result in the same building square footage and uses as the proposed Project, operation of Alternative 3 would generate the same amount of wastewater as the proposed Project. Therefore, development proposed under the Phase 1 preliminary site development plan would decrease wastewater generation at the Project site compared to existing conditions.

Implementation of the Phase 2 development program under Alternative 3 would increase wastewater generation at the Project site compared to Phase 1 and existing conditions. However, the Sewer Capacity Study prepared for the proposed Project concluded, after calculating the proposed sewer flow, the existing sewer lines along Diamond Street and Beryl Street could adequately accommodate the proposed sewer flow without upgrades. Additionally, the Los Angeles County Sanitation District (LACSD) South Bay Cities Main Trunk Sewer has adequate remaining capacity (2.1 million gallons per day [mgd]) to convey the increase in sewage flow of 47,361 gallons per day (gpd) (118,402.5 gpd peak flow) associated with Alternative 3. Therefore, implementation of Alternative 3 would result in a *less than significant* impact on existing wastewater infrastructure.

In addition, the JWPCP, which receives and treats wastewater from the Project site, has approximately 139 mgd of additional capacity and could adequately accommodate the increase in wastewater generation resulting from Alternative 3. Therefore, impacts related to wastewater treatment capacity would be *less than significant*, as described for the proposed Project.

*Solid Waste Management Services*

Similar to the proposed Project, Alternative 3 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. Given that Alternative 3 would develop the same building square footage and land uses as the proposed Project, the solid waste associated with Alternative 3 would be the same as that described for the proposed Project. The solid waste associated with Alternative 3 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 3 create a need for additional solid waste disposal facilities to adequately handle Project construction-generated inert waste and impacts would be *less than significant.*

<u>Relationship of Alternative to Project Objectives</u>

Alternative 3 would attain all of the Project Objectives. By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 3 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). As described for the proposed Project, Alternative 3 would integrate these Assisted Living and Memory Care facilities with the broader community through intergenerational

programs and shared gathering spaces within the other public health and wellness facilities on campus, such as the Aquatics Center and CHF (Project Objective 4). The proposed space for PACE, Community Services, and the Youth Wellness Center included in the Phase 1 preliminary site development plan as well as the Wellness Pavilion, Aquatics Center, and CHF included in the Phase 2 development program would support programs that address growing future community health needs (Project Objective 6). Redevelopment of the campus with the proposed RCFE Building in Phase 1 and proposed buildings(s) included in the Phase 2 development program would create a modern campus with facilities designed to meet the future health needs of residents (Project Objective 5). Although the configuration of the new vehicle entrance and northern perimeter road would eliminate the grass-crete as described for the proposed Project all other public open space (e.g., central lawn, Main Street promenade, sensory gardens, etc.) would be developed as described for the proposed Project. The public open space proposed for the interior of the Project site would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5).

### 5.5.4 Alternative 4 – Phase 1 Preliminary Site Development Plan Only

Alternative 4 would include the development described for the Phase 1 preliminary site development plan under the proposed Project; however, none of the uses under the Phase 2 development program (i.e., Wellness Pavilion, Aquatics Center, and CHF) would be developed on the campus.

Alternative 4 would include development of the RCFE Building including the 157 new Assisted Living units and 60 replacement Memory Care units as well as the PACE, Community Services, and Youth Wellness Center described under Section 2.5.1, *Phase 1 Preliminary Site Development Plan*. Following the development of the RCFE Building, demolition of the Beach Cities Health Center would also occur as described for the proposed Project. The maximum roof height of the RCFE Building would be the same as for the proposed Project (i.e., approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below). Given the potential inconsistency of the proposed Project with the TMC Section 92.30.8 and the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane, this alternative would also include the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Similar to Alternative 3, the alternative access and circulation design under this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. As such, this northern portion of the RCFE Building would incrementally decrease in floor area with each successive

level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level.

Given that none of the uses described under the Phase 2 development program (i.e., Wellness Pavilion, Aquatics Center, and CHF) would be developed on the campus, the CHF would remain off-site permanently. Additionally, the landscaped 40,725-sf landscape surface parking lot constructed within the footprint of the Beach Cities Health Center would remain in place. Alternative 4 would not involve the demolition of the Beach Cities Advanced Imaging Building or the parking structure located at 512 North Prospect Avenue and a new parking structure would not be constructed. As such, this alternative would provide more publicly accessible open space within the interior of the Project site.

Construction activities under Alternative 4 would be limited to those described under Section 2.5.1.6, *Construction Activities*. Therefore, this alternative would have only one phase of construction that would occur over a period of 29 months. Operational activities under Alternative 4 would be the same as those described for Phase 1 of the proposed Project.

Aesthetics and Visual Resources

Long-term impacts to aesthetics and visual resources would be the same as those described for Phase 1 under Alternative 3. The reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level. However, given that the maximum roof height of the RCFE Building in Phase 1 would remain as described for the proposed Project, Alternative 4 would still result in potentially significant impacts related to interruption of views of the Palos Verdes hills ridgeline from the highpoint at 190th Street & Flagler Lane (i.e., Representative View 6). As described for the proposed Project, MM VIS-1 would require a reduction in the height of the RCFE Building so that it would not interrupt the ridgeline. Therefore, impacts to this scenic vista from 190th Street would be *less than significant with mitigation*, as described for the proposed Project.

Under Alternative 4, construction and operational activities proposed under the Phase 2 development program would not occur. As such, under this alternative, views across the Project site and to the RCFE Building from North Prospect Avenue (i.e., Representative View 5) would not be obstructed. As with the proposed Project, the proposed development under Phase 1 would meet the development standards described in Redondo Beach General Plan and municipal code.

Therefore, similar to the proposed Project, impacts to existing visual character and the visual quality of the Project site and surrounding areas would be *less than significant*.

As with the proposed Project, the implementation of the Phase 1 preliminary site development plan under this alternative would incrementally increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, as with the proposed Project shading under this alternative would occur only in the evenings (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter). Therefore, impacts to shading from Alternative 4 would be *less than significant*, as described for the proposed Project. Additional shading impacts associated with the Phase 2 development program would be eliminated since this alternative would not include the construction of an Aquatic Center, Wellness Pavilion, CHF development, or the parking structure proposed under the Phase 2 development program (refer to Impact VIS-4 in Section 3.1, *Aesthetics and Visual Resources*).

Air Quality

*Construction Emissions*

Construction activities under Alternative 4 would be the same as those described for Phase 1 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). However, under this alternative, none of the construction activities described under the Phase 2 development program would occur.

Similar to the proposed Project, on-site construction emissions during Phase 1 would exceed LSTs for $PM_{10}$ and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph, reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD LSTs (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*, as described for the proposed Project. Additionally, as described for the proposed Project, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions from combustion by 79 to 94 percent. With the use of Tier 4 engines, DPM emissions anticipated during Phase 1 construction of Alternative 4 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 4 would be the same as those described for the Phase 1 proposed Project and would be *less than significant with mitigation*.

*Operational Emissions*

The proposed programs and operational activities would be the same as those described for Phase 1 of the proposed Project; however, the proposed programs and operational activities described for Phase 2 (i.e., Wellness Pavilion, Aquatics Center, CHF) would not occur under Alternative 4. Additionally, operational vehicle trips and VMT anticipated under Alternative 4 would be the same as those described for Phase 1 of the proposed Project. Therefore, operational emissions generated by Alternative 4 (including vehicle trips, electricity and natural gas consumption, and landscaping maintenance) would be similar to those described for Phase 1 of the proposed Project but those described under Phase 2 would not occur. Under Alternative 4, demolition of the existing Beach Cities Health Center without construction of the Wellness Pavilion, Aquatics Center, and CHF under Phase 2, operational air pollutant emissions would be substantially reduced compared to the proposed Project and existing conditions. Additionally, operation of proposed development under Alternative 4 would not release substantial amounts of TACs, and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from off-site. Therefore, under Alternative 4, operational air pollutant emissions would be substantially reduced as compared to the proposed Project, and would be *less than significant*.

Without the development of the proposed Aquatics Center and with the permanent relocation of CHF off-site, Alternative 4 would eliminate the net new vehicle trips generated by the proposed Project (refer to section 3.14, *Transportation*). As such, implementation of Alternative 4 would likely result in reduced CO levels at nearby intersections, and would not exceed CO thresholds as compared to existing conditions. Therefore, impacts related to odors under Alternative 4 would be *less than significant*.

Additionally, this alternative would include the same uses as the proposed Project and, as such, would also not result in objectionable odor impacts, similar to the proposed Project. Therefore, impacts related to odors under Alternative 4 would be *less than significant*.

Biological Resources

As previously described, construction activities under Alternative 4 would be the same as those described for the Phase 1 preliminary site development plan (refer to Section 2.5.1.6, *Construction Activities*), and construction activities described for the Phase 2 development program in Section 2.5.2.4, *Construction Activities* would not occur. Because Alternative 4 would not involve construction activities associated with the Phase 2 development, landscaped trees and shrubs located within the interior of the existing campus would remain, resulting in slightly reduced impacts to biological resources than would occur under the proposed Project. All vegetation

removal would occur in compliance with the MBTA and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1. The proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant*, as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 4 would result in the similar impacts to historical resources as described for the proposed Project. Similar to the proposed Project, Phase 1 of Alternative 4 would involve the demolition of the existing Beach Cities Health Center and the attached maintenance building, which are both historic-period structures that are more than 50 years old; however, the Historical Resources Assessment prepared for the campus in 2018 determined that these buildings did not meet any of the criteria for listing as a historic resource in CRHR or designation as a local landmark under the Redondo Beach Historic Ordinance (Ord. No. 2554) (refer to Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Therefore, the demolition of the Beach Cities Health Center and attached maintenance building under Alternative 4 would not result in a significant impact to historic built resources under the criteria set forth in CEQA Section 15064.5b(3). Further, as described for the proposed Project, implementation of Alternative 4 would not physically damage or substantially change the existing land use or historic context of any historic structures, including the Morell House and the Queen Anne House located 0.12 miles to the north of the Project site. Therefore, potential impacts to historic structures associated with the Phase 1 preliminary site development plan would be *less than significant*, as described for the proposed Project.

Potential impacts to previously unidentified archaeological resources, human remains, and tribal cultural resources under this alternative would be less than those described for the proposed Project. Construction activities, including ground disturbing activities (e.g., excavation, trenching, grading, etc.), under Alternative 4 would still include those described for Phase 1 and of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). For example, Phase 1 would

begin with the demolition of the existing surface parking lot and associated perimeter circulation road located at the northern edge of the Project site. Subsequent construction of the RCFE Building in Phase 1 would begin with a 26-foot-deep excavation for the subterranean service area and loading dock. Phase 1 construction would also include extensive trenching for installation of utilities, grading to level the site, and demolition of the Beach Cities Health Center and the attached maintenance building. However, under Alternative 4, none of the ground disturbing activities described for the Phase 2 development program would occur, including demolition of the existing above ground parking structure and Beach Cities Advanced Imaging Building, excavation of approximately 11,000 cy of soil, or grading. Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 in Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1a and -1b ~~and~~ as well as MM CUL-2 would also apply to this alternative during excavation and trenching activities proposed under the Phase 1 preliminary site development plan and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown archaeological resources, human remains, and tribal cultural resources to *less than significant with mitigation*, as described for the proposed Project.

Energy

Construction of Alternative 4 would require the same amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for Phase 1 (refer to Section 2.5.1.6, *Construction Activities*). Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Energy use during construction would generally not result in a substantial increase in on-site electricity consumption and would be substantially less than the ongoing energy use on-site under existing conditions at the campus. Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. However, under Alternative 4, without implementation of Phase 2, construction activities would require less diesel fuel than that required under the proposed Project. Alternative 4 would require approximately 887,767 gallons of construction fuel, or approximately 1,023,072 gallons less than what is required for construction of the proposed Project. Given that Alternative 4 would require substantially less construction fuel than the proposed Project, Alternative 4 construction fuel consumption would

represent an even smaller fraction – far less than 1 percent – of the Los Angeles County's total annual fuel consumption. This alternative would not result in the wasteful consumption of energy and overall impacts related to construction of Alternative 4 would be *less than significant*.

Operation of Alternative 4 would permanently reduce electricity demand as compared to existing settings. Following buildout of the Phase 1 preliminary site development plan, annual electricity demand of the site would be approximately 1,144,345 kWh per year, or 1,233,725 kWh per year less than existing conditions. The natural gas demand for operation of Alternative 4 would increase by 6,578 therms per year as compared to existing conditions, however, Alternative 4 would require 18,897 therms per year less than annual demand under the proposed Project. Nevertheless, Alternative 4 would still incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). The RCFE Building would also meet the equivalent of LEED Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment to renewable energy supplies and ensures that Alternative 4 would not use energy in a wasteful or inefficient manner and impacts would be *less than significant*, as described for the proposed Project.

As described in for *Air Quality*, without the development of the proposed Aquatics Center and with the permanent relocation of CHF off-site, Alternative 4 would eliminate the net new vehicle trips generated by the proposed Project (refer to section 3.14, *Transportation*). Therefore, the daily consumption of fuel for vehicle trips would be reduced compared to existing conditions.

Similar to the proposed Project, Alternative 4 would support the energy conservation and GHG reduction goals and policies established in the Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as the Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 4 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

<u>Geology and Soils</u>

Impacts related to geological resources and paleontological resources under Alternative 4 would be similar to those described under the proposed Project as geological impacts are generally site-

specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section 3.6, *Geology and Soils*. Under Alternative 4, construction activities would result in the same depth of ground disturbance (i.e., 26 feet); however, total area of ground disturbance would be slightly less than that described under the proposed Project. Under Alternative 4, a 26-foot-deep excavation near the central area of the campus and the export of approximately 30,250 cy of soil associated with the parking structure and service areas proposed under Phase 2 would not occur. As with the proposed Project, implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the UBC, CBC, RBMC, and TMC would address geologic hazards under this alternative. As with the proposed Project, mitigation and compliance with regulatory conditions would reduce impacts to geology and soils under Alternative 4 to *less than significant with mitigation*.

Impacts to paleontological resources would remain similar to the proposed Project (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources would be *less than significant with mitigation*, as described for the proposed Project.

Greenhouse Gas Emissions and Climate Change

Impacts related to GHG emissions and climate change under Alternative 4 would be less than those described for the proposed Project with the elimination of construction and operation associated with the Phase 2 development program. Given that the construction activities and the proposed programs and operational activities under Alternative 4 would be the same as those described for the Phase 1 preliminary site development plan of the proposed Project, GHG emissions anticipated under Alternative 4 would be the same as those estimated for Phase 1 of the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions and Climate Change*) and *less than significant*.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 4 would be similar to those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition, excavation, and grading. Accordingly, this alternative would

result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Additionally, as described for the proposed Project, Alternative 4 would provide a subterranean service area and loading dock creating the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform). MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols following discovery of contamination, soils management plan, soil vapor monitoring, and enrollment in the CalGEM's Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*, as described for the proposed Project. However, Alternative 4 would not include any additional excavation and grading associated with the parking structure proposed under Phase 2. Therefore, the potential for exposure to contaminated soils during Phase 2 would be slightly reduced compared to the proposed Project.

Hydrology and Water Quality

*Construction*

Impacts related to hydrology and water quality under Alternative 4 would be less than those described for the proposed Project with the elimination of the construction activities associated with the Phase 2 development program. Impacts to hydrology and water quality would be the same as those described for the Phase 1 preliminary site development plan of the proposed Project (refer to Section 3.9, *Hydrology and Water Quality*) and *less than significant*.

Similar to the proposed Project, Alternative ~~5~~4 would include excavation to a maximum depth of 26 feet bgs for the subterranean service area and loading dock of the RCFE Building during Phase 1 preliminary site development as well as the subterranean levels of the proposed parking structure depending upon the Phase 2 development program option. Therefore, construction impacts to groundwater levels under Alternative 4~~5~~ would be *less than significant*, as described for the proposed Project.

*Operation*

As described for the proposed Project, implementation of Alternative 4 would improve water quality and groundwater recharge from the existing setting by reducing the volume of runoff, reducing impervious surface area and improving infiltration at the Project site. However, the implementation of Alternative 4 would leave the campus with slightly more active green space,

landscaping, and grass-crete (refer to Figure 5-1) than the proposed Project, which would result in the development of additional impervious surfaces during Phase 2. As such, Alternative 4 would result in a net reduction in the total amount of impervious surface area compared to the proposed Project, which would reduce the potential for pollutants to become exposed during storm events. The reduction in the amount of impervious surfaces on-site and compliance with all applicable State and local regulations, such as the Redondo Beach Stormwater Management and Discharge Control Ordinance, would ensure that operational impacts to water quality would be *less than significant.* Further, implementation of Alternative 4 would improve groundwater recharge at the Project site and there would be *no impact* to groundwater quality as a result of Alternative 4.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 4 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85$^{th}$ percentile storm into the groundwater. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of Alternative 4. Additionally, given the reduction in impervious surface area relative to the proposed Project, Alternative 4 would reduce surface water flows and would have a *less than significant* impact on drainage capacity in the vicinity of the Project site.

As with the proposed Project, Alternative 4 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 UWMP) and impacts would be *less than significant*.

Land Use and Planning

Alternative 4 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Implementation of the alternative access and circulation design would remove vehicle access from Flagler Lane within Torrance and therefore, would be consistent with TMC Section 92.30.8. This would also remove the need for a grading or building permit from the City of Torrance. (Landscape plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Alternative 4 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 4 would be *less than significant*.

Noise

*Construction*

Under Alternative 4, the construction-related noise impacts described under 29-month duration of Phase 1 would be the same as those described for the proposed Project (refer to Impact NOI-1 in Section 3.11, *Noise*). However, Alternative 4 would eliminate construction noise and vibration impacts associated with the 28-month Phase 2 development program described for the proposed Project. Compliance with existing local noise regulations along with the implementation of MM NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. While the duration of construction noise would be reduced, noise levels would exceed FTA thresholds, and *significant and unavoidable* noise impacts would occur through implementation of proposed construction. Vibration levels from construction equipment and haul trips associated with BCHD development remain *less than significant* as described for the proposed Project.

*Operational*

As previously described, Alternative 4 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Under Alternative 4, the less than significant impacts related to operational vehicle noise would be further reduced as compared to the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*).

Because the existing parking structure at 512 North Prospect Avenue would remain in place, Alternative 4 would also eliminate noise impacts (e.g., engine idling, car alarms, screeching tires) associated with operation of the proposed 8.5-level parking structure in the Phase 2 development program of the proposed Project. Additionally, long-term operational outdoor noise impacts would likely be reduced given that the lack of the Wellness Pavilion, Aquatics Center, and CHF may reduce some of the programming involving amplified noise (e.g., outdoor fitness classes). Therefore, impacts related to operational noise under Alternative 4 would be slightly reduced compared to the proposed Project.

Population and Housing

Impacts related to population and housing under Alternative 4 would be slightly reduced as compared to those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. As described for the proposed Project, Alternative 4 would provide 157 Assisted Living units and 60 replacement Memory Care units for a total of 217 residential units,

creating a negligible increase in local population. The estimate increase in population would be minor and consistent with and well within SCAG's growth projections. Given that Alternative 4 would remove most of uses associated with the Beach Cities Health Center and would not have any of the uses described under the Phase 2 development program for the proposed Project, Alternative 4 is not expected to result in an increase in employment on-site. Therefore, employment under Alternative 4 would remain similar to existing conditions and would be reduced as compared to the proposed Project. Further, it is expected that most of Project employees would live in surrounding nearby cities and commute to Redondo Beach, as described for the proposed Project. This impact would be *less than significant* because there is sufficient regional housing availability to meet these demands.

Public Services

Under Alternative 4, impacts to demand for fire protection and EMS provided by RBFD as well as police protection services provided by RBPD would remain similar to those described for the proposed Project under Impact PS-1 through Impact PS-2. The increase in residents would be the same as that described under the proposed Project; however, Alternative 4 would result in fewer employees and a substantial reduction in visitors to the campus than described under the proposed Project. Therefore, Alternative 4 would slight reduce the demand for fire protection and EMS services provided by the RBFD as well as other non-emergency services as compared to existing conditions at the Project site. Therefore, Alternative 4 would not result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, and impacts under Alternative 4 would be *less than significant*.

Transportation

*Construction Traffic*

Under Alternative 4, construction-related transportation impacts described under 29-month duration of Phase 1 would be the same as those described for the proposed Project. However, Alternative 4 would eliminate construction-related impacts associated with the 28-month Phase 2 development program described for the proposed Project.

Construction activities associated with Alternative 4 would result in approximately 5,927 haul truck trips during the 29-month Phase 1 construction period. Increased construction traffic on freeways and streets, particularly large haul trucks and other heavy equipment (e.g., cement trucks

and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, particularly on North Prospect Avenue and Beryl Street (refer to Impact T-3 in Section 3.14, *Transportation*). However, as described for the proposed Project, the implementation of MM T-2 would reduce impacts related to construction traffic and public safety during Phase 1 by requiring the preparation of a Construction Traffic and Access Management Plan.

*Operational Traffic*

Alternative 4 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. The alternative access and circulation design would reconfigure the one-way driveway included in Phase 1 of the proposed Project to address concerns raised by the City of Torrance and the Torrance neighborhood residents related to vehicle access along Flagler Lane. Potential impacts associated with this alternative access and circulation design are described in detail for Alternative 3.

Given that Alternative 4 development would be limited to the Phase 1 preliminary site development plan, operational vehicle trips and VMT would be limited to those described for Phase 1 of the proposed Project. For example, Alternative 4 operations would reduce existing trip generation by approximately 1,919 daily vehicle trips as described for implementation of the Phase 1 preliminary site development plan (refer to Section 3.14, *Transportation*). While not required to mitigate a significant impact, implementation of recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project.

*The CHF is anticipated to be the largest contributor to vehicle trips to the Project site. However, under Alternative 4, relocation of the CHF off-site would be permanent and the Health and Wellness Pavilion and Aquatics Center proposed under the Project would not be constructed. As such, Alternative 4 would not create a new demand for parking space and traffic impacts would be substantially reduced under Alternative 4.*

Utilities and Service Systems

*Water Infrastructure and Supply*

As previously described, construction activities under Alternative 4 would be the same as those described for Phase 1 and eliminate all construction activities described under Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). As such, construction-related impacts to water infrastructure and supply under Alternative 4 would also be the same as those described for Phase 1 of the proposed Project (refer to Section 3.15.1, *Water Infrastructure and Supply*).

As described for the proposed Project, the existing water flow and pressure at the Project site would be adequate to serve the development under Alternative 4 in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the CPUC (Cal Water 2019). Given that under Alternative 4 the CHF and Aquatics Center proposed under the Phase 2 development program would not be developed, net water use would be reduced under Alternative 4 (see Table 5.5-3), and would be adequately served by Cal Water's existing water entitlements. Therefore, Alternative 4 would be consistent with local policies and operational impacts on potable water use would be *less than significant,* as described for the proposed Project.

**Table 5.5-3. Estimated Project Site Water Demand Comparison for Existing, Alternative 4, and Proposed Project Conditions**

| | Water Demand (gal/year) | Wastewater Generation (gpd) | Solid Waste Generation (tons/year) |
|---|---|---|---|
| Existing Project Site | 39,231,667 | 68,925 | 330.22 |
| Phase 1 Preliminary Site Development Plan Only Alternative | 45,822,139 | 62,606 | 466.27 |
| Proposed Project | 56,426,355 | 116,286 | 660.51 |

*Wastewater Collection, Conveyance, and Treatment*

As described earlier, construction-related impacts to wastewater infrastructure under Alternative 4 would also be the same as those described for Phase 1 (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*). Given that Alternative 4 would not include the Phase 2 development program described for the proposed Project, operation of Alternative 4 would generate substantially less wastewater than the proposed Project. Therefore, implementation of Alternative 4 would result in a *less than significant* impact on existing wastewater infrastructure.

*Solid Waste Management Services*

Similar to the proposed Project, Alternative 4 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. Given that Alternative 4 would not demolish the existing parking structure located at 512 North Prospect Avenue and would not develop the parking structure and other uses associated with the Phase 2 development program (i.e., Wellness Pavilion, Aquatics Center, and CHF), the solid waste associated with Alternative 4 would remain well below that described for the proposed Project and *less than significant*.

Relationship of Alternative to Project Objectives

By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 4 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 and continued operation of the Providence Little Company of Mary Medical Institute Building would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). Additionally, the campus would provide Assisted Living and Memory Care facilities with intergenerational programs and shared gathering spaces to integrate the housing with the broader community (Project Objective 4). Alternative 4 may implement the new vehicle entrance and northern perimeter road described under Alterative 2 and 4, eliminating the backyard garden lounge private open space dedicated for Assisted Living and Memory Care residents. Following demolition of the existing Beach Cities Health Center, the interior of the Project site would be converted to open space that would be sufficiently large to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education such as outdoor fitness classes and health fair expositions (Project Objectives 3). While the public open space proposed for the interior of the Project site would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5). While the RCFE Building would support PACE, Community Services, and the Youth Wellness Center, the community health and wellness benefits supported by the Wellness Pavilion and Aquatics Center would not be provided under this alternative. As such, the Assisted Living residents and PACE participants would not be able to enjoy special programming (e.g., aquatic aerobics and use of the heated therapy pool). Further, the CHF would be permanently relocated off-site, precluding programming for Assisted Living and Memory Care residents as well as PACE

participants. Without these programs and services, this alternative's ability to create a modern campus designed to meet the future health needs of residents (Project Objective 5), or address growing future community health needs (Project Objective 6) would be limited. Therefore, Alternative 4 would not meet Project Objectives 5 and 6 to the same extent as the proposed Project.

### 5.5.5 Alternative 5 – Relocate CHF Permanently and Reduced Parking Structure

Alternative 5 would include development of the RCFE Building including the 157 new Assisted Living units and 60 replacement Memory Care units as well as the PACE, Community Services, and Youth Wellness Center described under Section 2.5.1, *Phase 1 Preliminary Site Development Plan*. Following the development of the RCFE Building, demolition of the Beach Cities Health Center would also occur as described for the proposed Project. The maximum roof height of the RCFE Building would be the same as for the proposed Project (i.e., approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below). Given the potential inconsistency of the proposed Project with the TMC Section 92.30.8 and the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane, this alternative would also include the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Similar to Alternative 3, the alternative access and circulation design under this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. As such, this northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level.

Similar to the Phase 2 development program described for the proposed Project, Phase 2 of this alternative would begin with the demolition of the parking structure located at 512 North Prospect Avenue. Additionally, Phase 2 may also include the demolition of the Beach Cities Advanced Imaging Building and redevelopment with a 3-story, 50,000-sf, purpose-built medical office building, which would rise to a height of 45 feet, with a small parapet extending to 55 feet (refer to Section 2.5.2.3, *Example Site Plan Scenarios*). Additionally, this alternative would include the construction of a single building or multiple buildings supporting a 37,150-sf Wellness Pavilion and a 31,300-sf Aquatics Center. However, under this alternative, the CHF, which would be relocated prior to the beginning of construction activities during Phase 1, would remain off-site permanently and would not be relocated to the Project site. By eliminating one of the greatest contributors to parking demand from the Project site, Alternative 5 would substantially reduce the number of parking spaces required on-site during Phase 2 and the parking garage could be reduced

by approximately 200 spaces. This would result in a total height reduction of approximately 2 levels, or 30 feet.

Phase 1 construction activities under Alternative 5 would be the same as those described under Section 2.5.1.6, *Construction Activities* of this EIR. Phase 2 construction activities under Alternative 5 would be similar to those described for the proposed Project under Section 2.5.2.4, *Construction Activities*, but could be reduced in duration by between 4 to 6 months due to the elimination of the 20,000-sf CHF. Additionally, this alternative would eliminate the need for between 140 and 184 concrete truck trips as well as between 15 to 18 construction material (i.e., steel) delivery trips. With the exception of the CHF, which would remain off-site permanently, operational activities under Alternative 5 would be similar to those described for Phase 1 and Phase 2 of the proposed Project.

Aesthetics and Visual Resources

Under Phase 1 of Alternative 5, impacts to aesthetics and visual resources would be similar, but slightly reduced compared to those described for the proposed Project. For example, the maximum roof height of the RCFE Building in Phase 1 would remain at 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below as described for the proposed Project. However, the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As such, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level. However, given that the maximum roof height of the RCFE Building would remain as described for the proposed Project, Alternative 5 would result in potentially significant impacts related to interruption of views of the ridgeline of the Palos Verdes hills from the highpoint at 190th Street & Flagler Street (i.e., Representative View 6). As described for the proposed Project, MM VIS-1 would require a reduction in the height of the RCFE Building such that it would no longer interrupt the ridgeline of the Palos Verdes hills. Therefore, impacts to this scenic vista would be *less than significant with mitigation*.

Under Alternative 5, the CHF would be permanently relocated off-site prior to the beginning of construction activities during Phase 1, thereby eliminating one of the greatest contributors to parking demand from the Project site. As such, Alternative 5 would substantially reduce the number of parking spaces required on-site during Phase 2 and the proposed parking garage could

be reduced by approximately 200 spaces. This would result in a total height reduction of approximately 2 levels, or 30 feet. As with the proposed Project, the proposed development would meet the development standards described in Redondo Beach General Plan, zoning ordinance, and municipal code. Additionally, Planning Commission Design Review would ensure that the height and design of Alternative 5 would not degrade visual character and would ensure that light and views of the clear sky are adequately maintained. Therefore, similar to the proposed Project, Alternative 5 impacts to existing visual character and quality of the site and surrounding areas would be *less than significant*.

Since Alternative 5 would also implement the alternative access and circulation design described under Alternative 3, this alternative could remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane as described under the proposed Project. Rather than exit onto Flagler Lane, the proposed one-way driveway under Alternative 5 would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Therefore, Alternative 5 would further reduce impacts from vehicle headlights shining towards the Torrance neighborhood east of Flagler Lane. Impacts related to substantial new sources of light and glare from development under Alternative 5 would be incrementally reduced compared to those described for the proposed Project and *less than significant*.

Given that the maximum roof heights of the proposed RCFE under Alternative 5 would remain the same as for the proposed Project, impacts to shade and shadow would remain similar. The step backs on the proposed RCFE Building may incrementally reduce shading on the Torrance neighborhood to the east of the Project, Towers Elementary School, and the multi-family residences north of Beryl Street. Shading associated with the Phase 2 development program would vary depending on the development program option selected (refer to Section 2.5.2.3 *Development Options*). However, the reduced height of the parking structure under Alternative 5 would also incrementally reduce shading during Phase 2. As with the proposed Project, the implementation of the Phase 1 preliminary site development plan and the Phase 2 development program under this alternative would slightly increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, this shading would occur only in the evenings (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter). Therefore, impacts to shading from Alternative 5 would be *less than significant* as described for the proposed Project.

Air Quality

*Construction Emissions*

Construction activities under Alternative 5 would be the same as those described for Phase 1 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). However, the elimination of the 20,000 sf CHF and proposed under the Phase 2 development program would reduce the Phase 2 construction period by 4 to 6 months (refer to Section 2.5.2.4, *Construction Activities*). As such, under Alternative 5, construction-related impacts to air quality would be the same as those described for Phase 1 and slightly reduced from those described under Phase 2 of the proposed Project (refer to Section 3.2, *Air Quality*). Peak daily construction emissions would remain below the SCAQMD thresholds of significance as described for the proposed Project. Similar to the proposed Project, on-site construction emissions would exceed LSTs for $PM_{10}$ and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph, reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD LSTs (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*. As described for the proposed Project, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions from combustion by 79 to 94 percent. With the use of Tier 4 engines, DPM emissions anticipated during Phase 2 construction of Alternative 5 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 5 would be *less than significant with mitigation*, as described for the proposed Project.

*Operational Emissions*

Phase 1 operational activities associated with Alternative 5 would be the same as those described for Phase 1 of the proposed Project. Therefore, peak daily operational emissions associated with Phase 1 of this alternative would be the same as those described for the proposed Project under Impact AQ-4 in Section 3.2, *Air Quality*.

Given that the CHF would be permanently relocated off-site under Alternative 5, peak daily operational emissions associated with building operations and VMT generation would be slightly reduced relative to Phase 2 of the proposed Project. Since the CHF is projected to generate the majority of trips and VMT under the proposed Project, Alternative 5 would substantially reduce daily vehicle trips and VMT-related emissions as compared to the proposed Project. As such, implementation of Alternative 5 would likely result in reduced CO levels at nearby intersections,

and would not exceed CO thresholds as compared to existing conditions. Similar to the Project, increases in CO emissions associated with this alternative would not cause an exceedance of the Federal or State CO standards and CO hotspot impacts would be *less than significant*.

As described in Section 3.2, *Air Quality*, operation air emissions would continue to be below the SCAQMD mass daily thresholds and LSTs for all air pollutants. Additionally, operation of proposed development under Alternative 5 would not release substantial amounts of TACs, and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from offsite. Therefore, under Alternative 5, operational air pollutant emissions would be reduced as compared to the proposed Project, and would be *less than significant*.

Additionally, this alternative would include the same uses as the proposed Project and, as such, would also not result in objectionable odor impacts, similar to the proposed Project. Therefore, impacts related to odors under Alternative 5 would be *less than significant*, as described for the proposed Project.

Biological Resources

Construction activities under Alternative 5 would be the same as those described for the Phase 1 preliminary site development plan under Section 2.5.1.6, *Construction Activities*. Construction activities would be similar to those described for Phase 2, but could be reduced in duration by between 4 to 6 months due to the elimination of the 20,000-sf CHF. Nevertheless, implementation of the Phase 2 development program would still require the removal of landscaped trees and shrubs within the interior of the existing campus. As described for the proposed Project, all vegetation removal would occur in compliance with the MBTA and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1 and Phase 2 of Alternative 5. The proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant*, as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 5 would result in the same impacts to historical resources as described for the proposed Project. Additionally, potential impacts to previously unidentified archaeological resources, human remains, and tribal cultural resources under this alternative would also be similar to those under the proposed Project. Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 in Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1a and -1b as well as ~~and~~ MM CUL-2 would also apply to this alternative and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown archaeological resources, human remains, and tribal cultural resources to *less than significant with mitigation*.

Energy

*Construction*

Construction and operational activities under Alternative 5 would be the same as those described for Phase 1 of the proposed Project but slightly reduced under Phase 2 with the elimination of the 20,000 sf CHF. As such, Phase 1 construction of Alternative 5 would require the same amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for Phase 1 (refer to Section 2.5.1.6, *Construction Activities*). Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. However, with the elimination of the 20,000 sf CHF proposed under the Phase 2 development program, construction energy consumption would be slightly reduced from those described for the proposed Project. Overall energy impacts related to construction of Alternative 5 would be *less than significant*, as described for the proposed Project.

*Operation*

Operational activities under Alternative 5 would decrease electricity demand following buildout of the Phase 1 preliminary site development plan and permanently increase the electricity demand

following buildout of the Phase 2 development program as compared to existing conditions. However, because Alternative 5 would involve the permanent relocation of CHF off-site and would not include construction of a new 20,000-sf CHF building, the operational electricity consumption of Alternative 5 would be slightly reduced as compared to the proposed Project. Similarly, the natural gas demand for operation of Alternative 5 would increase from existing conditions but would be slightly reduced as compared to the proposed Project. Alternative 5 would incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, and energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). New buildings would also meet the equivalent of LEED Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment of Alternative 5 to renewable energy supplies and ensures that Alternative 5 would not use energy in a wasteful or inefficient manner. Similar to the proposed Project, Alternative 5 would support the energy conservation and GHG reduction goals and policies established in Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 5 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

Geology and Soils

Impacts related to geological resources and paleontological resources under Alternative 5 would remain similar to those described under the proposed Project as geological impacts are generally site-specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section 3.6, *Geology and Soils*. As with the proposed Project, implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the UBC, CBC, RBMC, and TMC would address geologic hazards under this alternative. Additionally, given that this alternative would result in the same depth of ground disturbance, as the proposed Project, impacts to paleontological resources would remain similar (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged

alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources would be *less than significant with mitigation*, as described for the proposed Project.

Greenhouse Gas Emissions and Climate Change

Construction activities and the proposed programs and operational activities under Alternative 5 would remain similar to those described for Phase 1. However, because duration of Phase 2 construction activities would be reduced by 4 to 6 months due to elimination of the 20,000-sf CHF, GHG related emissions during construction and operational activities under Alternative 5 would be slightly less than those described for Phase 2 of the proposed Project. Further, since this alternative would include the same uses and sustainability features as the proposed Project, impacts related to conflicts with plans and policies related to reduction in GHG emissions would be the same as those identified in Impact GHG-1 for the proposed Project and would be *less than significant*, as described for the proposed Project.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 5 would be similar to those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition and excavation. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation of the Phase 1 preliminary site development plan and demolition of above ground parking garage and potentially the Beach Cities Advanced Imaging Building during implementation of the Phase 2 development program (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). As described for the proposed Project, Alternative 5 would provide a subterranean service area and loading dock below the proposed RCFE Building in Phase 1 as well as the potential for subterranean parking levels and service areas depending upon the Phase 2 development program option. As such, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform) would be similar (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Overall, impacts with regard to hazards and hazardous materials under this alternative would be similar to those described under the proposed

Project. As such, MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols following discovery of contamination, soils management plan, soil vapor monitoring, and enrollment in the CalGEM's Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*, as described for the proposed Project.

Hydrology and Water Quality

*Construction*

Construction activities under Alternative 5 would be the same as those described for Phase 1 (refer to Section 2.5.1.6, *Construction Activities*). Construction activities under Phase 2 would be similar to those described under the proposed Project but the duration of the construction period would be 4 to 6 months less than due to the elimination of the 20,000-sf CHF. Therefore, construction-related impacts to water quality would be *less than significant*.

Similar to the proposed Project, Alternative 5 would include excavation to a maximum depth of 26 feet bgs for the subterranean service area and loading dock of the RCFE Building during Phase 1 preliminary site development as well as the subterranean levels of the proposed parking structure depending upon the Phase 2 development program option. Therefore, construction impacts to groundwater levels under Alternative 5 would be the same as those described for the proposed Project and *less than significant*.

*Operation*

As described for the proposed Project, implementation of Alternative 5 would improve water quality and groundwater recharge by reducing the volume of runoff and improving infiltration at the Project site. The reduction in the amount of impervious surfaces on-site and compliance with all applicable State and local regulations would ensure that operational impacts to water quality would be *less than significant.* Further, implementation of Alternative 5 would improve groundwater recharge at the Project site and as described for the proposed Project there would be *no impact* to groundwater quality as a result of Alternative 5.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 5 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85$^{th}$ percentile storm into the groundwater. The existing storm drain infrastructure discharging to the City of Torrance municipal storm drain system at the storm drain line beneath Flagler Lane would be abandoned in place. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to

the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of Alternative 5. Therefore, similar to the proposed Project, Alternative 5 would have a *less than significant* impact on drainage capacity in the vicinity of the Project site.

As with the proposed Project, Alternative 5 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 UWMP) and impacts would be *less than significant*.

Land Use and Planning

Alternative 5 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Implementation of the alternative access and circulation design would remove vehicle access from Flagler Lane within Torrance and therefore, would be consistent with TMC Section 92.30.8. This would also remove the need for a grading or building permit from the City of Torrance. (Landscape plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Alternative 5 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 5 would be *less than significant*.

Noise

*Construction*

Under Alternative 5, the construction-related noise impacts would be similar to those described for the proposed Project. However, since Alternative 5 would not include the construction of the 20,000-sf CHF, the Phase 2 construction period and associated noise impacts would be reduced by approximately 4 to 6 months. Nevertheless, the proposed building(s) under the Phase 2 development program would be up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below. Therefore, as described for the proposed Project, construction activities would produce increased noise levels that would impact surrounding noise-sensitive receptors, as the necessary noise barrier heights required to mitigate the construction noise are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Compliance with existing local noise regulations along with the implementation of MM NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. However, *significant and unavoidable* noise impacts would occur throughout the proposed construction. Vibration levels from construction equipment and haul trips

associated with BCHD development remain *less than significant* as described for the proposed Project.

*Operation*

As described earlier, Alternative 5 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Under Alternative 5, impacts related to operational vehicle noise would be similar to, but incrementally reduced as compared to the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*).

*Alternatives 3, 4, 5, and 6 would implement an alternative access and circulation scheme than described in the proposed Project. The reconfigured roadways would eliminate vehicle entry on to Flagler Lane, including trash pick-up and delivery operations and other traffic related noise, thereby reducing vehicle noise levels within the adjacent Torrance neighborhood.*

Because the CHF is projected to generate the majority of vehicle trips to the Project site under the proposed Project and Alternative 5 would permanently relocate the CHF off-site, Alternative 5 would reduce impacts from traffic-related noise. Alternative 5 would also reduce parking spaces developed on-site compared to the proposed Project. Additionally, long-term operational outdoor noise impacts would likely be reduced given that the lack of the CHF may reduce some of the programming involving amplified noise (e.g., outdoor fitness classes). Therefore, impacts related to operational noise under Alternative 5 would be incrementally reduced compared to the proposed Project and *less than significant with mitigation*.

<u>Population and Housing</u>

Impacts related to population and housing under Alternative 5 would remain similar to those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. However, increases in employment under Alternative 5 would be slightly reduced from the 170 new jobs expected under the proposed Project, since the CHF would be permanently located off-site. As described for the proposed Project, employment opportunities would likely be filled by members of the local and regional labor force. Potential increases in the low- and moderate-income work force within the Redondo Beach could incrementally increase demand for affordable housing within the City; however, it is expected that the majority of employees would live in surrounding

nearby cities and commute to Redondo Beach, as described for the proposed Project. This impact would be *less than significant* as there is sufficient regional housing availability to meet these demands.

Public Services

Under Alternative 5, impacts to demand for fire protection and EMS by the RBFD as well as police protection services provided by RBPD would remain similar to those described for the proposed Project under Impact PS-1 through Impact PS-2. Alternative 5 would result in an increase in residents, employees, and visitors at the campus, and could incrementally increase the demand for fire protection and EMS services RBFD as well as other non-emergency services as compared to existing conditions at the Project site. However, the number of employees and visitors would be slightly reduced given the removal of the 20,000-sf CHF from the Phase 2 development program. Therefore, Alternative 5 would not result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, and impacts under Alternative 5 would be *less than significant*.

Transportation

*Construction Traffic*

As previously described, construction activities under Alternative 5 would be the same as those described for Phase 1 and similar to those described for Phase 2 of the proposed Project, with slight reductions due to the elimination of the 20,000-sf CHF. As such, construction-related impacts on the transportation network would be the same as those described for Phase 1 but duration of Phase 2 of the proposed Project could be reduced in by 4 to 6 months due to the elimination of the 20,000-sf CHF. As with the proposed Project, construction activities associated with Alternative 5 would result in approximately 5,927 haul truck trips during the 29-month Phase 1 construction period; however, Alternative 5 would eliminate the need for between 140 and 184 concrete truck trips as well as between 15 to 18 construction material (i.e., steel) delivery trips during the Phase 2 construction period, requiring only 3,607 to 3,654 haul truck trips. Increased construction traffic on freeways and streets, particularly large haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, particularly on North Prospect Avenue and Beryl Street. Implementation of MM T-2 would reduce impacts related to construction traffic and public safety by requiring the preparation of a Construction Traffic and Access Management Plan.

*Operational Traffic*

Alternative 5 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. The alternative access and circulation design would reconfigure the one-way driveway included in Phase 1 of the proposed Project to address concerns raised by the City of Torrance and the Torrance neighborhood residents related to vehicle access along Flagler Lane. Potential impacts associated with this alternative access and circulation design are described in detail for Alternative 3.

Since the CHF is one of the primary trip generators on the existing campus, Alternative 5 would substantially reduce daily trip generation and VMT as compared to the proposed Project. Further, permanent relocation of the CHF would substantially reduce the number of parking spaces required on-site during Phase 2. While not required to mitigate a significant impact, implementation of recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project (refer to Section 3.14, *Transportation*).

Utilities and Service Systems

*Water Infrastructure and Supply*

As previously described, construction activities under Alternative 5 would be the same as those described for Phase 1 and Phase similar to those described 2 of the proposed Project, with slight reductions due to the elimination of the 20,000-sf CHF (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). The construction period for the Phase 2 development program would be reduced by 4 to 6 months from the proposed Project. Therefore, construction-related impacts to water infrastructure and supply under Alternative 5 would be slightly reduced compared to those described for the proposed Project (refer to Section 3.15.1, *Water Infrastructure and Supply*).

As described for the proposed Project, the existing water flow and pressure at the Project site is adequate to serve the development under Alternative 5 in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the CPUC (Cal Water 2019). As described in Section 3.15, *Utilities and Service Systems*, existing water entitlements would adequately meet water demand under the proposed Project. Because

Alternative 5 would permanently relocate the CHF off-site, annual water demand would be 55,243,495 gallons, or 1,182,860 gallons less than under the proposed Project (see Table 5.5-4). As such, Alternative 5 would be adequately served by Cal Water's existing water entitlements. Additionally, Alternative 5 may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water), as described for the proposed Project. Recycled water could be used for landscape irrigation and architectural water features, water for mechanical cooling towers, and water for toilet flushing in order to reduce overall water demand under Alternative 5. Therefore, Alternative 5 would be consistent with local policies and operational impacts on potable water use would be *less than significant*, as described for the proposed Project.

**Table 5.5-4. Estimated Project Site Water Demand Comparison for Existing, Alternative 5, and Proposed Project Conditions**

| | Water Demand (gal/year) | Wastewater Generation (gpd) | Solid Waste Generation (tons/year) |
|---|---|---|---|
| Existing Project Site | 39,231,667 | 68,925 | 330.22 |
| Relocate CHF Permanently Alternative | 55,243,495 | 100,286 | 600.00 |
| Proposed Project | 56,426,355 | 116,286 | 660.51 |

*Wastewater Collection, Conveyance, and Treatment*

Construction-related impacts to wastewater under Alternative 5 would be the same as those described for Phase 1 and similar to those described 2 of the proposed Project, with slight reductions due to the elimination of the 20,000-sf CHF (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*).

Given that Alternative 5 would result in 20,000 sf less building square footage as compared to the proposed Project due to the elimination of the on-site CHF, operation of Alternative 5 would generate slightly less wastewater as the proposed Project. Development proposed under the Phase 1 preliminary site development plan would incrementally decrease wastewater generation at the Project site as compared to existing conditions. Implementation of the Phase 2 development program under Alternative 5 would increase wastewater generation at the Project site as compared to Phase 1 and existing conditions but would decrease wastewater generation as compared to the proposed Project by 16,000 gpd. The Sewer Capacity Study prepared for the proposed Project concluded, after calculating the proposed sewer flow, the existing sewer lines could adequately accommodate the proposed sewer flow without upgrades. Additionally, the LACSD South Bay Cities Main Trunk Sewer has adequate remaining capacity (2.1 mgd) to convey the increase in

sewage flow of 31,361 gpd (118,402.5 gpd peak flow) associated with proposed Project. Therefore, implementation of Alternative 5 would result in a *less than significant* impact on existing wastewater infrastructure, as described for the proposed Project.

*Solid Waste Management Services*

Similar to the proposed Project, Alternative 5 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. The solid waste associated with Alternative 5 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, as described for the proposed Project, Alternative 5 would not create a need for additional solid waste disposal facilities to adequately Project construction-generated inert waste and impacts would be *less than significant.*

Relationship of Alternative to Project Objectives

Alternative 5 would attain all of the Project Objectives. By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 5 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). As described for the proposed Project, Alternative 5 would integrate these Assisted Living facilities with the broader community through intergenerational programs and shared gathering spaces within the other public health and wellness facilities on campus, such as the Aquatics Center and Youth Wellness Center (Project Objective 4). However, since the CHF would be permanently relocated off-site under Alternative 5, this alternative would not provide benefits related to space efficiency and overlapping programs. For example, the Aquatic Center and CHF programs would not benefit from having shared locker rooms and showers on-site as for the proposed Project. Additionally, the CHF would preclude programming for Assisted Living and Memory Care residents as well as PACE participants, such as health and fitness classes specially designed for older adults and senior citizens. Nonetheless, the proposed space for PACE, Community Services, and the Youth Wellness Center included in the Phase 1 preliminary site development plan as well as the Wellness Pavilion and Aquatics Center included in the Phase 2 development program would support programs that address growing future community health needs (Project Objective 6). Redevelopment of the campus with the proposed RCFE Building in

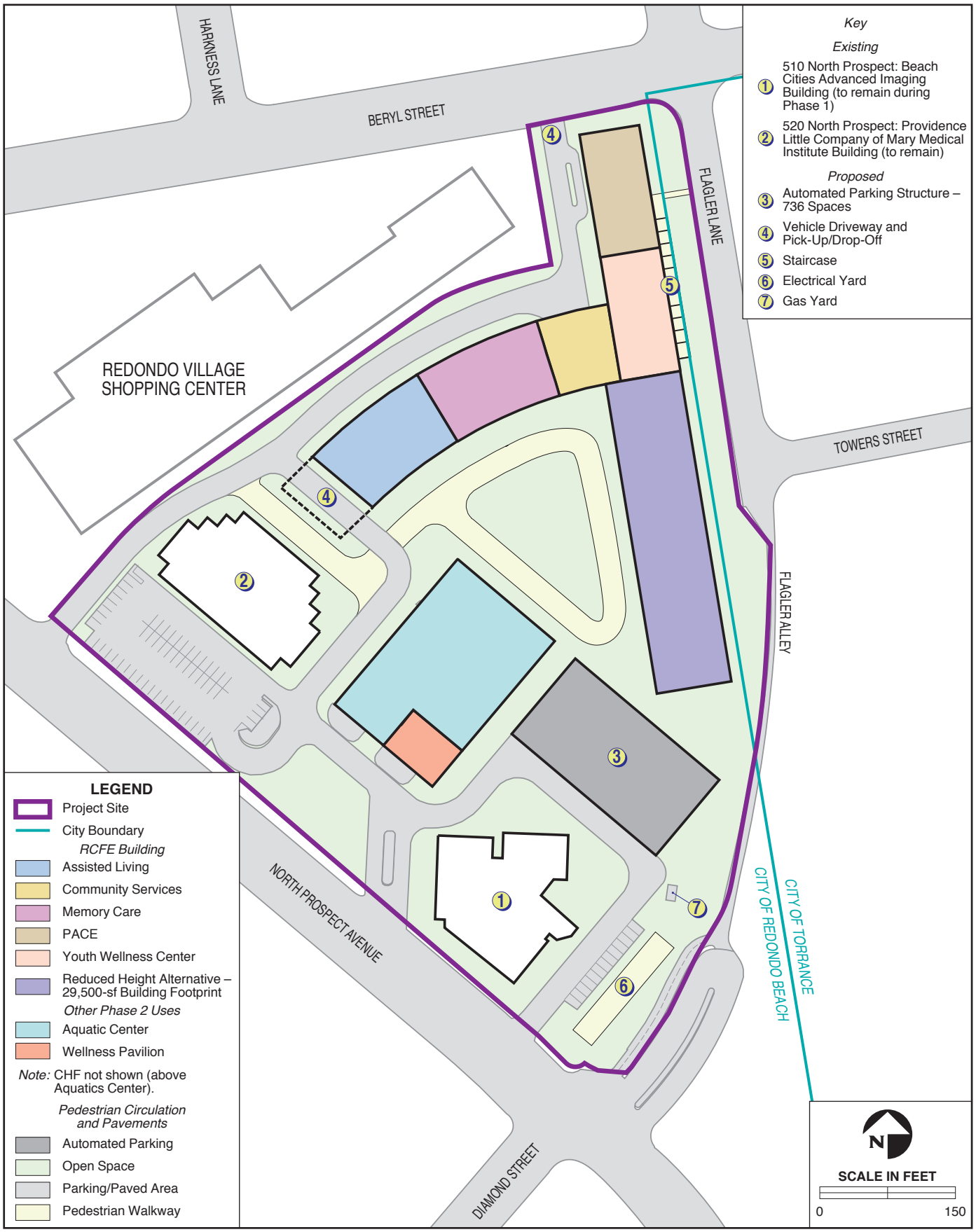
Phase 1 and proposed buildings(s) included in the Phase 2 development program would create a modern campus with facilities designed to meet the future health needs of residents (Project Objective 5). Public open space (e.g., central lawn, Main Street promenade, sensory gardens, etc.) and the new landscaping of this alternative would also be similar to that described for the proposed Project. All public open space (e.g., central lawn, Main Street promenade, sensory gardens, etc.) would be developed as described for the proposed Project. The public open space proposed for the interior of the Project site would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5).

### 5.5.6 Alternative 6 – Reduced Height Alternative

As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would result in potentially significant impacts related to interruption of views of the ridgeline of the Palos Verdes hills from the highpoint at 190th Street & Flagler Street (i.e., Representative View 6). MM VIS-1 would require a reduction in the height of the RCFE Building such that it would no longer interrupt the ridgeline of the Palos Verdes hills. Therefore, impacts to this scenic vista would be *less than significant with mitigation*. However, the financial feasibility of implementing MM VIS-1 is not certain at this time. A reduction in floor height would remove programmable revenue-generating space in the RCFE Building. Additionally, excavation to recess the building further below the ground surface would be costly.

Under Alternative 6, approximately 88,800 sf of building space would be removed from the top 2 stories of the RCFE Building to avoid the impact to scenic vistas. However, unlike MM VIS-1, this alternative would add this space back to the RCFE Building as an addition that wraps around the eastern perimeter of the campus (see Figure 5-2). Each floor of the building addition would allow for approximately 29,500 sf; therefore, the addition to the RCFE Building would require 3 stories to replace the 88,800 sf of building square footage removed from the upper levels of the RCFE Building.

As with the proposed Project, Alternative 6 would include development of the RCFE Building including the 157 new Assisted Living units and 60 replacement Memory Care units as well as the PACE, Community Services, and Youth Wellness Center described under Section 2.5.1, *Phase 1 Preliminary Site Development Plan*. The maximum roof height of the RCFE Building would be approximately 76 feet above the campus ground level and 106.5 feet above the vacant Flagler Lot below. The addition to the RCFE Building along the eastern perimeter of the campus would rise to a height of approximately 41 feet above the campus ground level.




wood.

**Reduced Height Alternative**

**FIGURE 5-2**

Given the potential inconsistency of the proposed Project with the TMC Section 92.30.8 and the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane, this alternative would also include the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Similar to Alternative 3, the alternative access and circulation design under this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. As such, this northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level.

The Phase 2 development program would be the same as that described for the proposed Project. Construction activities under Alternative 6 would be similar to those described under Section 2.5.1.6, *Construction Activities* of this EIR, but would result in a greater area of ground disturbance. Construction activities under Alternative 6 would be the same as those described for Phase 2 under Section 2.5.2.4, *Construction Activities* of this EIR.

Aesthetics and Visual Resources

Under Phase 1 of Alternative 6, the maximum roof height of the RCFE Building in Phase 1 would be reduced by approximately 27 feet as compared to the proposed Project (i.e., 76 feet above the existing ground level and 106.5 feet above the vacant Flagler Lot below). As viewed from the highpoint at the intersection of 190th Street & Flagler Lane (i.e., Representative View 6), the reduced RCFE Building height under Alternative 6 would not interrupt views of the Palos Verdes hills ridgeline unlike the proposed Project. Therefore, impacts to this scenic vista would be *less than significant*, and MM VIS-1 would not be required. Additionally, given that Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As such, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to further minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level. These step backs would allow for more views of the open sky from the intersection of Beryl Street & Flagler Lane (i.e., Representative View 3) and would minimize potential impacts to visual character or quality as compared to the proposed Project. However, Alternative 6 would require a 3-story addition to the eastern side of the RCFE Building along the

eastern perimeter of the Project site to replace the building square footage from the upper 2 stories of the RCFE Building that would be removed to reduce the maximum roof height under this alternative. The addition to the RCFE Building along the eastern perimeter of the campus would rise to a height of approximately 41 feet above the campus ground level. As such, the building mass as viewed from Flagler Lane & Towers Street (i.e., Representative View 2) would be slightly greater as compared to the proposed Project.

Since Alternative 6 would also implement the access and circulation design described under Alternative 3, this alternative would remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane as described under the proposed Project. Rather than exit onto Flagler Lane, the proposed one-way driveway under Alternative 6 would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Therefore, Alternative 3 would eliminate vehicle traffic onto Flagler Lane and would completely eliminate the less than significant light impacts from vehicle headlights shining towards the Torrance neighborhood east of Flagler Lane.

The reduced building height and step backs on the proposed RCFE Building would reduce the total area and duration shading on the adjacent Torrance neighborhood, Towers Elementary School, and the multi-family residences north of Beryl Street as compared to the proposed Project. However, shading associated with the Phase 2 development program would be the same as those described for the proposed Project (refer to Section 3.1, *Aesthetics and Visual Resources*). As with the proposed Project, the implementation of the Phase 1 preliminary site development plan and the Phase 2 development program under this alternative would incrementally increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, this shading would occur only in the evenings (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter). Therefore, impacts to shading from Alternative ~~5~~6 would be *less than significant*.

Air Quality

*Construction Emissions*

Construction activities under Alternative 6 would remain similar to those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). However, the addition to the RCFE Building would require a greater building footprint and thus, a greater area of ground disturbance during construction. Additionally, construction activities associated with this addition would be located closer to the Torrance neighborhood to the east. As such, on-site construction-related $PM_{10}$ and $PM_{2.5}$ emissions

would be greater than those described for the proposed Project. Similar to the proposed Project, on-site construction emissions would exceed LSTs for $PM_{10}$ and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph (refer to Section 3.2, *Air Quality*). With implementation of MM AQ-1, on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ would be reduced to levels below the SCAQMD LSTs. Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*. Additionally, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions. With the use of Tier 4 engines, DPM emissions anticipated during Phase 1 construction of Alternative 6 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 6 would remain similar to those described for the proposed Project and would be *less than significant with mitigation*.

*Operational Emissions*

The proposed programs and operational activities under Alternative 6 would be the same as those described for Phase 1 and Phase 2 of the proposed Project. Additionally, operational vehicle trips and VMT anticipated under Alternative 6 would be the same as those described for the proposed Project. Therefore, operational emissions generated by Alternative 6 (including vehicle trips, electricity and natural gas consumption, and landscaping maintenance) would be the same as those described for Phase 1 and Phase 2 of the proposed Project and *less than significant*.

As discussed in Section 3.2, *Air Quality*, the proposed Project would contribute to cumulative traffic in the area and would incrementally increase CO levels at nearby intersections, but would not exceed CO thresholds. As with the proposed Project, increases in CO emissions associated with this alternative would not cause an exceedance of the Federal or State CO standards and CO hotspot impacts would be *less than significant*.

Additionally, this alternative would include the same residential, medical office, and public health uses as the proposed Project and, as such, would also not result in objectionable odor impacts, similar to the proposed Project. Therefore, impacts related to odors under Alternative 6 would be *less than significant*, as described for the proposed Project.

Biological Resources

As previously described, construction activities under Alternative 6 would remain similar to those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction*

*Activities* and Section 2.5.2.4, *Construction Activities*). However, construction associated with Alternative 6 would result in an increase area of ground disturbance on-site related to the addition to the eastern side of the RCFE Building. Therefore, Alternative 6 would result in the removal of additional landscaped trees, shrubs, and other ground cover as compared to the proposed Project. Nevertheless, all vegetation removal would occur in compliance with the MBTA and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1 and Phase 2 of Alternative 6. The proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant*, as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 6 would result in the same *less than significant* impacts to historical resources as described for the proposed Project. Potential impacts to previously unidentified archaeological resources, human remains, and tribal cultural resources under this alternative would also be similar to those under the proposed Project. The addition to the eastern side of the RCFE Building under Alternative 6 would result in a greater building footprint as compared to the proposed Project and thus, a greater area of ground disturbance during construction. However, the type of ground disturbing activities (e.g., excavation, trenching, grading, etc.) and depth of excavation (i.e., 26 feet) would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1a and -1b as well as ~~and~~ MM CUL-2 would also apply to this alternative and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown

archaeological resources, human remains, and tribal cultural resources to *less than significant with mitigation*, as described for the proposed Project.

Energy

As previously described, construction activities under Alternative 6 would be the same as those described for the Phase 1 preliminary site development plan and would be similar to those described for the Phase 2 development program of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Construction of Alternative 6 would require a similar amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for the proposed Project. Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. Alternative 6 may require slightly more haul truck trips to export asphalt demolition debris and soil associated with construction of the eastern addition to the RCFE Building. Therefore, Alternative 6 would more construction fuel than the 1,910,839 gallons described for the proposed Project; however, impacts associated with Alternative 6 would be *less than significant*, as described for the proposed Project.

As described for the proposed Project, operation of Alternative 6 would decrease electricity demand following buildout of the Phase 1 preliminary site development plan and permanently increase the electricity demand following buildout of the Phase 2 development program by approximately 2,611,552 kWh per year as compared to existing conditions. The natural gas demand for operation of Alternative 6 would increase by approximately 25,475 therms per year as compared to existing conditions. However, Alternative 6 would incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). New buildings would also meet the equivalent of LEED Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment of Alternative 6 to renewable energy supplies and would ensure that Alternative 6 would not use energy in a wasteful or inefficient manner.

Similar to the proposed Project, Alternative 6 would support the energy conservation and GHG reduction goals and policies established in the Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as the Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 6 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

Geology and Soils

Impacts related to geological resources and paleontological resources under Alternative 6 would be the same as those described under the proposed Project as geological impacts are generally site-specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section, 3.6, *Geology and Soils*. As with the proposed Project, implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the UBC, CBC, RBMC, and TMC would address geologic hazards under this alternative. As with the proposed Project, compliance with regulatory requirements and the implementation of MM GEO-1 would reduce impacts to geology and soils under Alternative 6 to *less than significant with mitigation*.

While the addition to the eastern side of the RCFE Building under Alternative 6 would result in a greater area of ground disturbance as compared to the proposed Project, this alternative would result in the same depth of ground disturbance as the proposed Project. Therefore, impacts to paleontological resources would remain similar to those described for the proposed Project (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources would be *less than significant with mitigation*.

Greenhouse Gas Emissions and Climate Change

Impacts related to GHG emissions and climate change under Alternative 6 would remain similar to those described for the proposed Project. Given that the construction activities and the proposed programs and operational activities under Alternative 6 would remain similar to those described

for Phase 1 and Phase 2 of the proposed Project, GHG emissions anticipated under Alternative 6 would remain similar to those estimated for the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions and Climate Change*). Further, since this alternative would include the same uses as well as the same sustainability features as the proposed Project, impacts related to conflicts with plans and policies related to reduction in GHG emissions would be the same as those identified in Impact GHG-1 for the proposed Project and would be *less than significant*.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 6 would be similar to those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition and excavation. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation of the Phase 1 preliminary site development plan and demolition of the parking structure and potentially the Beach Cities Advanced Imaging Building during implementation of the Phase 2 development program (refer to Impact HAZ-2, in Section 3.8, *Hazards and Hazardous Materials*). As described for the proposed Project, Alternative 6 would provide a subterranean service area and loading dock below the Project site in Phase 1 as well as the potential for subterranean parking depending upon the Phase 2 development program option. As such, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform) would be similar (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Overall, impacts with regard to hazards and hazardous materials under this alternative would be similar to those described under the proposed Project. As such, MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols following discovery of contamination, soils management plan, soil vapor monitoring, and enrollment in the CalGEM's Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*.

Hydrology and Water Quality

*Construction*

Construction-related impacts related to hydrology and water quality under Alternative 6 would remain similar to those described for the proposed Project. As with the proposed Project, construction of Alternative 6 would involve major earthwork, including excavation and shoring

for subterranean levels, grading, and trenching for utilities, which would disturb the underlying soils and expose them to potential erosion and sediment transport into adjacent storm drain inlets – particularly during storm events or during on-site watering. Alternative 6 would result in an additional disturbance footprint of approximately 29,500 sf along the eastern boundary of the campus, which would slightly increase the potential for erosion. However, implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of Alternative 6. Therefore, construction-related impacts to water quality associated with Alternative 6 would be *less than significant*, as described for the proposed Project.

Similar to the proposed Project, Alternative 6 would include excavation to a maximum depth of 26 feet bgs for the subterranean service area and loading dock of the RCFE Building during Phase 1 as well as the subterranean levels of the proposed parking structure and service areas under the Phase 2 development program. However, construction impacts to groundwater levels would be *less than significant*, as described for the proposed Project.

*Operation*

As with the proposed Project, Alternative 6 would result in a net reduction in the total amount impervious surface area compared to existing condition, which would reduce the potential for pollutants to become exposed during storm events. However, given the increase in the building footprint associated with the addition to the eastern side of the proposed RCFE Building, Alternative 6 would reduce pervious surface area by approximately 29,500-sf as compared to the proposed Project. Nevertheless, compliance with all applicable State and local regulations, would ensure that operational impacts to water quality would be *less than significant.* Further, implementation of Alternative 6 would improve groundwater recharge at the Project site and there would be *no impact* to groundwater quality as a result of Alternative 6.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 6 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85$^{th}$ percentile storm into the groundwater. The existing storm drain infrastructure discharging to the City of Torrance municipal storm drain system at the storm drain line beneath Flagler Lane would be abandoned in place. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of

Alternative 6. Therefore, Alternative 6 would have a net increase in the impacts to drainage capacity as compared to the proposed Project; however, this increase would be *less than significant*.

Similar to the proposed Project, Alternative 6 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 UWMP) and impacts would be *less than significant*, as described for the proposed Project.

Land Use and Planning

Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Implementation of the alternative access and circulation design would remove vehicle access from Flagler Lane within Torrance and therefore, would be consistent with TMC Section 92.30.8. This would also remove the need for a grading or building permit from the City of Torrance. (Landscape Plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Alternative 6 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 4 would be *less than significant*.

Noise

*Construction*

Under Alternative 6, impacts related to construction-related noise impacts would be increased compared to the proposed Project. Construction associated with the addition on the along the eastern boundary of the Project site would increase the intensity of construction activity along the eastern perimeter of the campus, which is located adjacent to sensitive receptors within the Torrance neighborhood. Similar to the proposed Project, these construction noise levels would exceed FTA's residential construction noise impact criterion. The necessary noise barrier heights required to mitigate noise from construction activities above 30 feet are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Therefore, construction-related noise impacts would be *significant and unavoidable*, as described for the proposed Project. However, the height of the RCFE Building under Alternative 6 would be reduced as compared to the proposed Project, as such the total duration of construction above the noise barrier would also be reduced.

Similar to the proposed Project, ground-borne vibration would be generated from the use of heavy construction equipment at the Project site, which could potentially expose existing sensitive land

uses in the vicinity to excessive vibration. Vibration levels generated during construction associated with Alternative 6 would be similar to those described for the proposed Project and *less than significant*.

*Operation*

As previously described, Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Under Alternative 6, less then significant impacts related to operational vehicle noise would further reduced as compared to the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*). Long-term operational noise impacts from HVAC equipment, parking operations, and on-site noise activities associated with Alternative 6 (i.e., outdoor seating, fitness classes, amplified music, etc.) would remain similar to those described for the proposed Project.

Population and Housing

Impacts related to population and housing under Alternative 6 would be the same as those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. As described for the proposed Project, these impacts would be *less than significant* under Alternative 6 as there is sufficient regional housing availability to meet these demands.

Public Services

Alternative 6 would result in the same demand for public services as described for the proposed Project. Therefore, environmental impacts resulting from increased demand for fire protection and police protection services for Phase 1 and Phase 2 of Alternative 6 would be *less than significant* as described for the proposed Project.

Transportation

*Construction Traffic*

While Alternative 6 would include an alternative access and circulation design and a reconfiguration of the RCFE Building, the proposed floor area of the RCFE Building would remain the same (i.e., 283,070 sf); therefore, the scope and duration of Phase 1 construction activities would be the same as those described for Phase 1 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). Construction activities under Alternative 6 would remain similar to those described for Phase 2 of the proposed Project (refer to Section 2.5.2.4, *Construction Activities*). Implementation of MM T-2 would reduce impacts related to construction traffic and public safety

by requiring the preparation of a Construction Traffic and Access Management Plan. Therefore, Alternative 6 impacts to transportation during construction would be *less than significant*, as described for the proposed Project.

*Operational Traffic*

Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. The alternative access and circulation design would reconfigure the one-way driveway included in Phase 1 of the proposed Project to address concerns raised by the City of Torrance and the Torrance neighborhood residents related to vehicle access along Flagler Lane. Potential impacts associated with this alternative access and circulation design are described in detail for Alternative 3.

Given that the proposed uses under Alternative 6 would be the same as those described for Phase 1 and Phase 2 of the proposed Project, operational vehicle trips and VMT would also be the same as those described for Phase 1 and Phase 2 of the proposed Project. While not required to mitigate a significant impact, implementation of recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project (refer to Section 3.14, *Transportation*).

<u>Utilities and Service Systems</u>

*Water Infrastructure and Supply*

Construction activities under Alternative 6 would be similar to those described for Phase 1 and the same as those Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Alternative 6 would result in an additional disturbance footprint of approximately 29,500 sf along the eastern boundary of the campus, which would slightly increase the need for water use for dust control. However, impacts would remain *less than significant*, as described for the proposed Project.

As described for the proposed Project, the existing water flow and pressure at the Project site is adequate to serve Alternative 6 in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water's potable water system has the infrastructure and the capacity to serve the development under Alternative 6. Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the CPUC (Cal

Water 2019). Given that Alternative 6 would result in the same building square footage and uses as the proposed Project, Alternative 6 would be adequately served by Cal Water's existing water entitlements. Therefore, Alternative 6 would be consistent with local policies and operational impacts on potable water use would be *less than significant*.

*Wastewater Collection, Conveyance, and Treatment*

Construction-related impacts to wastewater under Alternative 6 would also remain similar to those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*). Given that Alternative 6 would result in the same building square footage and uses as the proposed Project, operation of Alternative 6 would generate the same amount of wastewater as the proposed Project. Therefore, implementation of Alternative 6 would result in a *less than significant* impact on existing wastewater infrastructure.

*Solid Waste Management Services*

Similar to the proposed Project, Alternative 6 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. Given that Alternative 6 would develop~~ment~~ the same building square footage and land uses as the proposed Project, the solid waste associated with Alternative 6 would be the same as that described for the proposed Project. The solid waste associated with Alternative 6 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 6 would not create a need for additional solid waste disposal facilities to adequately handle construction-generated inert waste and impacts would be *less than significant.*

<u>Relationship of Alternative to Project Objectives</u>

Alternative 6 would attain all of the Project objectives. By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 6 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). As described for the proposed Project, Alternative 6 would integrate these assisted living facilities with the broader community through intergenerational programs and shared gathering spaces within the other public health and wellness facilities on campus, such as the Aquatics Center and CHF (Project Objective 4). The proposed space for PACE, Community

Services, and the Youth Wellness Center included in the Phase 1 preliminary site development plan as well as the Wellness Pavilion, Aquatics Center, and CHF included in the Phase 2 development program would support programs that address growing future community health needs (Project Objective 6). Redevelopment of the campus with the proposed RCFE Building in Phase 1 and proposed buildings(s) included in the Phase 2 development program would create a modern campus with facilities designed to meet the future health needs of residents (Project Objective 5). The configuration of the new vehicle entrance and northern perimeter road would eliminate the backyard garden lounge private open space dedicated for Assisted Living and Memory Care residents. Additionally, the 3-story addition to the eastern side of the RCFE Building would replace some of the public open space (i.e., central lawn) proposed for the interior of the Project site under the proposed Project (refer to Figure 5-2). The public open space that would be provided under Alternative 6 would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5), although to a lesser extent than the proposed Project.

## 5.6 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment.

Table 5.5-5 compares the environmental impacts of the proposed Project and the analyzed alternatives. Of the alternatives considered, the No Project Alternative generates the fewest environmental impacts; therefore, it is generally environmentally superior to any project that proposes to change existing conditions through the addition of increased development with associated impacts. However, CEQA Guidelines Section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

According to CEQA Guidelines Section 15126.6(a), the purpose of an alternatives analyses is to identify alternative developments that would feasibly attain most of the basic objectives of the project but that would avoid or substantially reduce any of the significant effects of the proposed Project. Other than the No Project Alternative, none of the remaining alternatives would avoid the significant and unavoidable construction-related noise impacts at nearby sensitive receptors. Daily construction-related impacts would be similar to those described for the proposed Project (i.e.,

construction noise levels would be similar; however, the total duration of construction noise would be reduced due to the elimination of the Phase 2 development program).

**Table 5.5-5. Impact Comparison of Alternatives to the Proposed Project**

| Issue Area | Project | Comparison to Project | | | | | |
|---|---|---|---|---|---|---|---|
| | | No Project | Alt 2 | Alt 3 | Alt 4 | Alt 5 | Alt 6 |
| Aesthetics and Visual Resources | Less than Significant with Mitigation | Less | Slightly Less | Slightly Less | Similar | Slightly Less | Less |
| Air Quality | Less Than Significant with Mitigation | Less | Similar | Less | Slightly Less | Similar | Slightly Greater |
| Biological Resources | Less Than Significant with Mitigation | Slightly Less | Similar | Slightly Less | Similar | Similar | Slightly Greater |
| Cultural Resources and Tribal Cultural Resources | Less Than Significant with Mitigation | Less | Similar | Slightly Less | Similar | Similar | Similar |
| Energy | Less Than Significant | Less | Similar | Less | Slightly Less | Similar | Similar |
| Geology and Soils | Less Than Significant with Mitigation | Less | Similar | Less | Similar | Similar | Similar |
| Greenhouse Gas Emissions and Climate Change | Less Than Significant | Less | Similar | Less | Slightly Less | Similar | Similar |
| Hazards and Hazardous Materials | Less Than Significant with Mitigation | Less | Similar | Slightly Less | Similar | Similar | Similar |
| Hydrology and Water Quality | Less Than Significant | Less | Similar | Slightly Less | Slightly Less | Similar | Similar |
| Land Use and Planning | Less Than Significant | Less | Less | Slightly Less | Slightly Less | Slightly Less | Slightly Less |
| Noise | Significant and Unavoidable | Less | Similar | Less | Slightly Less | Similar | Slightly Greater |
| Population and Housing | Less Than Significant | Slightly Greater | Similar | Slightly Less | Similar | Similar | Similar |
| Public Services | Less Than Significant with Mitigation | Less | Similar | Slightly Less | Similar | Similar | Similar |
| Transportation | Less Than Significant with Mitigation | Less | Slightly Less | Less | Less | Slightly Less | Slightly Less |

| Issue Area | Project | Comparison to Project | | | | | |
|---|---|---|---|---|---|---|---|
| | | No Project | Alt 2 | Alt 3 | Alt 4 | Alt 5 | Alt 6 |
| Utilities and Service Systems | Less Than Significant | Less | Similar | Less | Slightly Less | Similar | Similar |
| **Meets Most of the Project Objectives?** | **Yes** | **No** | **Yes** | **No** | **Yes** | **Yes** | **Yes** |

Alternative ~~5~~6 would reduce the maximum roof height of the RCFE Building and would retain the existing views of the Palos Verdes hills from the highpoint at the intersection of 190th Street & Flagler Lane (i.e., Representative View 6); however, this alternative would include a 3-story addition to the eastern side of the RCFE Building, which would increase the building mass and reduce views of open sky as viewed from the Torrance residential neighborhood to the east. This alternative may also increase the intensity of construction related air quality and noise impacts in the Torrance neighborhood to the east of the campus.

Alternatives 3, 4, 5, and 6 would all be implemented with the alternative access and circulation design described for Alternative 3. This alternative access and circulation design would ensure consistency with TMC Section 92.30.8 (refer to Section 3.10, *Land Use and Planning*) and would avoid potential constraints associated with the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane (refer to Section 3.14, *Transportation*). As described in Section 3.10, *Land Use and Planning*, the one-way driveway and pick-up/drop-off exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. Additionally, the City of Torrance is also planning to pilot the temporary removal of the southbound vehicle movement along Flagler Lane between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If the pilot is successful, the City of Torrance may permanently remove southbound traffic along Flagler Lane south of Beryl Street. This change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock. The alternative access and circulation design would direct service and delivery vehicles to the reconfigured one-way driveway off of Beryl Street, which would provide access to the subterranean service area and loading dock. Under the alternative access and circulation design, less than significant impacts related to potential inconsistency with TMC Section 92.30.8 and cut-through traffic in the Torrance neighborhood would be eliminated.

Additionally, less than significant impacts related to vehicle headlights and operational noise associated with the one-way driveway exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane would be eliminated under the alternative access and circulation design. For example, the alternative access and circulation design would eliminate the one-way driveway exit onto Flagler Lane and associated potential for minor light impacts from vehicle headlights shining towards the residences east of Flagler Lane. The alternative access and circulation design would also further reduce operational noise levels (e.g., vehicle traffic, trash compacting and delivery truck operations) at nearby sensitive receptors (i.e., the Torrance neighborhood to the east of the Project site) from vehicles entering/exiting the driveways and traveling on Flagler Lane under the proposed Project.

Alternative 4 is the environmentally superior alternative because it would substantially reduce the severity of the construction-related noise impacts, which would be significant and unavoidable under the proposed Project. This alternative would reduce the total duration of construction-related noise to 29 months over one phase of development. Additionally, this alternative would similarly reduce the duration of construction-related criteria pollutant and GHG emissions. Finally, Alternative 4 would eliminate the net increase in trips associated with Phase 2 and would instead result in a substantial reduction relative to existing conditions. However, while this is the environmentally superior alternative, it is unclear if this alternative would be financially feasible given the required reduction in the height of the proposed RCFE Building required by MM VIS-1, without any replacement of the square footage (e.g., as described for Alternative 6). As such, Alternative 4 may not be able to meet the Project Objective 6 to *"[g]enerate sufficient revenue through mission-derived services and facilities to address growing future community health needs."*

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# 7.0 REFERENCES

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# 8.0 INTRODUCTION TO THE FINAL EIR

## 8.1 PUBLIC REVIEW PROCESS

California Environmental Quality Act (CEQA) Guidelines Section 15105 requires a minimum 45-day period for public review of a Draft Environmental Impact Report (EIR). In recognition of the ongoing COVID-19 and the associated public health guidelines issued by California Governor Gavin Newsom, the Beach Cities Health District (BCHD) provided an extended 90-day comment period for the Draft EIR, which began on March 10, 2021 and ended on June 10, 2021. During this period, a total of 303 individual written comment letters and 17 oral comments were received (see Appendix N).

## 8.2 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, CEQA requires the lead agency to prepare a Final EIR. CEQA Guidelines Section 15132 specifies that the Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft EIR;

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;

(d) The responses of the lead agency to significant environmental points raised in the review and consultation process; and

(e) Any other information added by the lead agency.

## 8.3 USE OF THE FINAL EIR

The Final EIR provides responsible agencies, other relevant public agencies, and interested members of the public with an opportunity to review the response to comments, revisions to the Draft EIR, and other components of the EIR prior a on the proposed Project and its alternatives by the BCHD Board of Directors. The Final EIR will serve as the environmental document to support approval of the proposed Project or its alternatives, either in whole or in part.

After completing a Final EIR, and before approving a project, the lead agency must first *"certify"* the Final EIR. As required by CEQA Guidelines Section 15090, certification consists of three distinct but complementary findings:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
- That the Final EIR reflects the lead agency's independent judgment and analysis.

The Final EIR and the findings will be submitted to decision-makers of the Cities for consideration in connection with the proposed Project.

CEQA *"Findings of Fact"* are adopted pursuant to CEQA Guidelines Section 15091(a), which provides that if an EIR that has been certified for a project identifies one or more significant environmental effects, the lead agency decision-making body must make one or more of the following findings with respect to each significant effect identified in the Final EIR:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially reduce the significant environmental effect as identified in the EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding, though references to supporting text in the EIR documentation is commonly used to satisfy that requirement. In addition, pursuant to CEQA Guidelines Section 15091(d), the lead agency must adopt, in conjunction with the findings, a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation, Monitoring, and Reporting Program (MMRP).

Additionally, pursuant to CEQA Guidelines Sections 15091(b) and 15093(b), when a lead agency approves a project that would result in significant, unavoidable impacts that are disclosed

in the Final EIR, the lead agency must state in writing its reasons for supporting the approved action. This written statement, known as a Statement of Overriding Considerations, must be supported by substantial information in the record, which includes this Final EIR.

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# 9.0 RESPONSES TO COMMENTS ON THE DRAFT EIR

## 9.1 INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, the Beach Cities Health District (BCHD), as the lead agency, has reviewed all of the comments received on the Draft Environmental Impact Report (EIR) for the proposed Healthy Living Campus Master Plan (Project), including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on March 24, 2021, April 13, 2021, and April 17, 2021. The Final EIR provides written responses to all comments on the Draft EIR raising significant environmental issues that were received during the 90-day public review period. The comments on the Draft EIR include issues raised by the public that warrant clarification or correction of certain statements in the Draft EIR. However, none of the corrections or additions to the Draft EIR constitute significant new information or substantial changes to the proposed Project as defined by CEQA Guidelines Section 15088.5.

The Draft EIR was made available for a 90-day review period between March 10, 2021 and June 10, 2021. During this period, a total of 303 individual written comment letters and 17 oral comments were received. Each of the commenters is listed in Table 8-1. This table is immediately followed by Master Comment Responses (see Section 9.2, *Master Comment Responses*) and then responses to the comments that were included in each of the individual comment letters (see Section 9.3, *Individual Comment Responses*).

Each comment letter has been assigned an abbreviation based on the first and last name of the commenter (e.g., the comment from Keith Butler, Chief Business Officer, Torrance Unified School District has been abbreviated as "KB"). The body of each comment letter has been separated into individual comments, which have been numbered. This results in a numbering system whereby the first comment in the letter from Torrance Unified School District is depicted as Comment KB-1, and so on. These numbered comments are included in their entirety, followed by the corresponding responses. Copies of the comment letters are included in Appendix N of this Final EIR. Table 8-1 presents a list of all persons or organizations who submitted written comments and/or oral comments on the Draft EIR.

## Table 8-1. Summary of Public Comments Received on the Draft EIR

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| **Public Agencies** | | | |
| EG | Emily Gibson / Frances Duong, Associate Transportation Planner, Local Development – Intergovernmental Review, California Department of Transportation (Caltrans) District 7, Los Angeles | June 10, 2021 | 10 |
| KB | Keith Butler, Chief Business Officer, Torrance Unified School District | April 29, 2021 | 5 |
| PF1 | Patrick Furey, Mayor, City of Torrance | June 3, 2021 | 42 |
| WB | William (Bill) Brand, Mayor, City of Redondo Beach | June 8, 2021 | 54 |
| **Non-Governmental Organizations** | | | |
| MC | Marcia Cook, Chair, Sierra Club Palos Verdes / South Bay Group | June 8, 2021 | 16 |
| **Neighborhood Organizations** | | | |
| TRAO | Torrance Redondo Against Overdevelopment (TRAO) | June 1, 2021 | 134 |
| **Legal Comments** | | | |
| RLD | Rebecca L. Davis, Lozeau Drury LLP on behalf of Supporters Alliance for Environmental Responsibility (SAFER) | June 10, 2021 | 1 |
| RR1 | Robert R. Ronne | June 3, 2021 | 10 |
| RR2 | | June 3, 2021 | 8 |
| RR3 | | June 3, 2021 | 16 |
| RR4 | | June 3, 2021 | 2 |
| RR5 | | June 4, 2021 | 2 |
| RR6 | | June 4, 2021 | 2 |
| RR7 | | June 4, 2021 | 10 |
| RR8 | | June 4, 2021 | 14 |
| RR9 | | June 4, 2021 | 18 |
| RR10 | | June 5, 2021 | 7 |
| RR11 | | June 6, 2021 | 2 |
| RR12 | | June 9, 2021 | 1 |
| **Form Letters** | | | |
| FL1 | Form Letter 1<br>• Anonymous/Unknown<br>• Patrick Wickens<br>• Judith Scott | May 23, 2021 – June 9, 2021 | 72 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| | • William & Vivian Shanney<br>• Peggy Gilhooly<br>• Jerry Lake<br>• Hamant & Robin Patel<br>• Janet Smolke<br>• Louis Friedman<br>• Fred Fasen<br>• Dale Smolke<br>• Peter Friedman<br>• Pennie<br>• Nancy Orchard<br>• Carol Friedman<br>• Marcio Nava<br>• Bruce Steele | | |
| FL2 | Form Letter 2<br>• Lisa Youngworth<br>• Fred Fasen<br>• Pennie<br>• Peter Friedman<br>• Louis Friedman<br>• Nancy Orchard<br>• Marcio Nava | May 23, 2021 – June 9, 2021 | 27 |
| **Interested Members of the Public** | | | |
| AK1 | Abbes Khani | March 23, 2021 | 1 |
| AK2 | | March 25, 2021 | 1 |
| AK3 | | June 3, 2021 | 2 |
| AA | Alan Archer | June 9, 2021 | 5 |
| AI1 | Alan Israel | March 24, 2021 | 7 |
| AI2 | | June 9, 2021 | 6 |
| AR | Allen Rubin | May 25, 2021 | 1 |
| AY | Amy Yick | June 9, 2021 | 2 |
| ABC1 | Anita & Bob Caplan | June 8, 2021 | 1 |
| ABC2 | | June 8, 2021 | 1 |
| AMG | Ann & Marty Gallagher | June 8, 2021 | 3 |
| AC1 | Ann Cheung | April 13, 2021 | 4 |
| AC2 | | June 6, 2021 | 5 |
| AW | Ann Wolfson | June 10, 2021 | 43 |
| AN1 | Anonymous/Unknown | April 3, 2021 | 4 |
| AN2 | | May 23, 2021 | 1 |
| AN3 | | May 23, 2021 | 1 |
| AN4 | | May 24, 2021 | 11 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| AN5 | | June 8, 2021 | 2 |
| AN6 | | June 10, 2021 | 2 |
| AT | April Telles | April 13, 2021 | 7 |
| ABP | Arlene & Bob Pinzler | May 21, 2021 | 6 |
| BE | Barbara Epstein | June 9, 2021 | 8 |
| BP | Bonnie Pierce | June 9, 2021 | 1 |
| BO | Brian Onizuka | April 4, 2021 | 1 |
| BW1 | Brian Wolfson | June 4, 2021 | 47 |
| BW2 | | June 8, 2021 | 24 |
| BW3 | | June 10, 2021 | 4 |
| CP | Carl Paquette | June 10, 2021 | 4 |
| CR | Cecilia Raju | June 9, 2021 | 4 |
| CG | Charlene Gilbert | June 10, 2021 | 12 |
| CI | Chiaki Imai | June 6, 2021 (sent by Jay Bichanich on June 9, 2021) | 5 |
| CK | Chikako Kashino | June 7, 2021 | 1 |
| CKS | Chris & Kristy Sullivan | June 2, 2021 | 4 |
| CT | Chris Tuxford | April 22, 2021 (provided by phone to Charlie Velasquez) | 1 |
| CO | Colleen Otash | May 26, 2021 | 1 |
| CC | Conna Condon | March 10, 2021 | 2 |
| DR | Dan Rogers | April 28, 2021 | 1 |
| DG | Dana Grollman | June 8, 2021 | 7 |
| DF | Dean Francois | June 10, 2021 | 7 |
| DV | Delia Vechi | June 10, 2021 | 11 |
| DH1 | Diane Hayashi | June 10, 2021 | 2 |
| DH2 | | June 10, 2021 | 1 |
| EA | Edward Arnn | June 10, 2021 | 9 |
| EN | Elisa Nye | March 24, 2021 | 5 |
| ES | Elisabeth Schneider | June 6, 2021 | 2 |
| FB1 | Frank Briganti | May 22, 2021 | 8 |
| FB2 | | June 9, 2021 | 11 |
| FVC | Frank Von Coelln | June 10, 2021 | 5 |
| FF1 | Fred Fasen | April 12, 2021 | 3 |
| FF2 | | May 26, 2021 | 3 |
| GD | Gary Dyo | June 6, 2021 | 5 |
| GPA | George & Pam Afremow | June 10, 2021 | 6 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| GP1 | George Parker | March 14, 2021 | 3 |
| GNY1 | Glen & Nancy Yoko | June 4, 2021 | 3 |
| GNY2 | | June 10, 2021 | 8 |
| GDV | Grace DuVall | June 10, 2021 | 3 |
| GP2 | Greg Podegracz | April 13, 2021 | 4 |
| HRP | Hamant & Robin Patel | May 17, 2021 | 4 |
| JH | Jack Holman | May 25, 2021 | 1 |
| JE1 | Jackie Ecklund | June 2, 2021 | 17 |
| JE2 | James Ecklund | June 9, 2021 | 4 |
| JB1 | Jay Bichanich | June 9, 2021 | 4 |
| JS1 | Jaysen Surber | June 4, 2021 | 1 |
| JW | Jeff Widmann | March 21, 2021 | 3 |
| JS2 | Jennifer Sams | April 13, 2021 | 6 |
| JM | Jim Mooney | March 30, 2021 | 4 |
| JL | Jingyi Li | June 9, 2021 | 6 |
| JD1 | Joan Davidson | June 10, 2021 | 2 |
| JD2 | | June 10, 2021 | 14 |
| JHRC | Josephine Hrzina & Richard Crisa | March 24, 2021 | 1 |
| JV | Josey Vanderpas | June 9, 2021 | 2 |
| JS3 | Joyce Stauffer | May 27, 2021 | 13 |
| JC | Joyce Choi | June 6, 2021 | 1 |
| JB2 | Judith Bunch | June 10, 2021 | 2 |
| JS4 | Judith Scott | June 9, 2021 | 2 |
| JK | Judy Kamp | June 2, 2021 | 1 |
| JD3 | Julie Dominguez | April 13, 2021 | 3 |
| KY1 | Kenneth Yano | June 10, 2021 | 15 |
| KA | Kevin Ajamian | June 8, 2021 | 5 |
| KY2 | Kyung Yoon | June 6, 2021 | 4 |
| LM | L. Mooney | April 9, 2021 | 3 |
| LD1 | Lara Duke | April 13, 2021 | 5 |
| LD2 | | April 17, 2021 | See Responses LD1-1 through LD1-5 |
| LD3 | | June 6, 2021 | 8 |
| LW | Laura Woolsey | May 26, 2021 | 1 |
| LDZ | Laura D. Zahn | June 10, 2021 | 9 |
| LAC | Leanne & Andy Clifton | March 24, 2021 | 2 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| LHPQ | Leanne Hill & Peter Quelch | June 7, 2021 | 5 |
| LJZ | Linda & Joe Zelik | June 6, 2021 | See Responses GPA-1 through GPA-6 |
| LK | Linda Kranz | June 9, 2021 | 7 |
| LY | Lisa Youngworth | March 24, 2021 | 2 |
| LH2 | Lyndon Hardy | June 3, 2021 | 6 |
| MB1 | M. Burschinger | May 26, 2021 | 1 |
| MCG | Marcia & Carl Gehrt | June 8, 2021 | 6 |
| MG1 | Marcie Guillermo | March 24, 2021 | 6 |
| MG2 | | June 10, 2021 | 4 |
| MB2 | Maren Blyth | June 9, 2021 | 3 |
| MS | Maria Schneider | June 6, 2021 | 3 |
| MN1 | Mark Nelson | March 10, 2021 | 1 |
| MN2 | | March 22, 2021 | 1 |
| MN3 | | March 22, 2021 | 3 |
| MN4 | | March 24, 2021 | 1 |
| MN5 | | March 24, 2021 | 1 |
| MN6 | | March 24, 2021 | 1 |
| MN7 | | March 24, 2021 | 1 |
| MN8 | | March 25, 2021 | 1 |
| MN9 | | March 25, 2021 | 1 |
| MN10 | | March 25, 2021 | 1 |
| MN11 | | March 25, 2021 | 1 |
| MN12 | | March 26, 2021 | 1 |
| MN13 | | March 29, 2021 | 1 |
| MN14 | | April 2, 2021 | 1 |
| MN15 | | April 4, 2021 | 1 |
| MN16 | | April 4, 2021 | 1 |
| MN17 | | April 4, 2021 | 1 |
| MN18 | | April 5, 2021 | 2 |
| MN19 | | April 6, 2021 | 1 |
| MN20 | | April 6, 2021 | 6 |
| MN21 | | April 6, 2021 | 1 |
| MN22 | | April 6, 2021 | 1 |
| MN23 | | April 6, 2021 | 8 |
| MN24 | | April 6, 2021 | 1 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| MN25 | | April 6, 2021 | 36 |
| MN26 | | April 11, 2021 | 1 |
| MN27 | | April 13, 2021 | 13 |
| MN28 | | April 14, 2021 | 1 |
| MN29 | | April 16, 2021 | 1 |
| MN30 | | April 17, 2021 | 6 |
| MN31 | | April 17, 2021 | 1 |
| MN32 | | April 17, 2021 | 1 |
| MN33 | | April 26, 2021 | 1 |
| MN34 | | April 26, 2021 | 6 |
| MN35 | | April 28, 2021 | 1 |
| MN36 | | April 28, 2021 | 1 |
| MN37 | | April 29, 2021 | 1 |
| MN38 | | April 29, 2021 | 1 |
| MN39 | | April 30, 2021 | 1 |
| MN40 | | April 30, 2021 | 1 |
| MN41 | | April 30, 2021 | 1 |
| MN42 | | May 3, 2021 | 1 |
| MN43 | | May 4, 2021 | 1 |
| MN44 | | May 4, 2021 | 1 |
| MN45 | | May 6, 2021 | 1 |
| MN46 | | May 6, 2021 | 1 |
| MN47 | | May 6, 2021 | 1 |
| MN48 | | May 6, 2021 | 1 |
| MN49 | | May 6, 2021 | 1 |
| MN50 | | May 6, 2021 | 1 |
| MN51 | | May 6, 2021 | 1 |
| MN52 | | May 6, 2021 | 1 |
| MN53 | | May 6, 2021 | 1 |
| MN54 | | May 6, 2021 | 1 |
| MN55 | | May 6, 2021 | 1 |
| MN56 | | May 6, 2021 | 1 |
| MN57 | | May 6, 2021 | 1 |
| MN58 | | May 6, 2021 | 1 |
| MN59 | | May 6, 2021 | 13 |
| MN60 | | May 6, 2021 | 1 |
| MN61 | | May 6, 2021 | 1 |
| MN62 | | May 8, 2021 | 1 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| MN63 | | May 8, 2021 | 1 |
| MN64 | | May 10, 2021 | 1 |
| MN65 | | May 11, 2021 | 1 |
| MN66 | | May 12, 2021 | 1 |
| MN67 | | May 12, 2021 | 1 |
| MN68 | | May 12, 2021 | 1 |
| MN69 | | May 14, 2021 | 12 |
| MN70 | | May 15, 2021 | 14 |
| MN71 | | May 15, 2021 | 1 |
| MN72 | | May 15, 2021 | 1 |
| MN73 | | May 16, 2021 | 1 |
| MN74 | | May 16, 2021 | 1 |
| MN75 | | May 16, 2021 | 3 |
| MN76 | | May 17, 2021 | 1 |
| MN77 | | May 17, 2021 | 1 |
| MN78 | | May 17, 2021 | 1 |
| MN79 | | May 17, 2021 | 1 |
| MN80 | | May 17, 2021 | 1 |
| MN81 | | May 20, 2021 | 1 |
| MN82 | | May 20, 2021 | 1 |
| MN83 | | May 20, 2021 | 1 |
| MN84 | | May 23, 2021 | 1 |
| MN85 | | May 24, 2021 | 1 |
| MN86 | | May 24, 2021 | 3 |
| MN87 | | May 25, 2021 | 10 |
| MN88 | | May 25, 2021 | 1 |
| MN89 | | May 27, 2021 | 1 |
| MN90 | | May 27, 2021 | 1 |
| MN91 | | May 27, 2021 | 1 |
| MN92 | | May 27, 2021 | 1 |
| MN93 | | May 28, 2021 | 1 |
| MN94 | | May 28, 2021 | 1 |
| MN95 | | May 29, 2021 | 1 |
| MN96 | | June 1, 2021 | 1 |
| MN97 | | June 1, 2021 | 1 |
| MN98 | | June 1, 2021 | 1 |
| MN99 | | June 1, 2021 | 1 |
| MN100 | | June 2, 2021 | 1 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| MN101 | | June 4, 2021 | 4 |
| MN102 | | June 4, 2021 | 1 |
| MN103 | | June 5, 2021 | 3 |
| MN104 | | June 5, 2021 | 1 |
| MN105 | | June 5, 2021 | 1 |
| MN106 | | June 6, 2021 | 20 |
| MN107 | | June 7, 2021 | 8 |
| MN108 | | June 8, 2021 | 4 |
| MN109 | | June 8, 2021 | 1 |
| MN110 | | June 9, 2021 | 1 |
| MN111 | | June 9, 2021 | 1 |
| MN112 | | June 9, 2021 | 2 |
| MN113 | | June 10, 2021 | 1 |
| MN114 | | June 10, 2021 | 1 |
| MN115 | | June 10, 2021 | 4 |
| MN116 | | June 10, 2021 | 1 |
| MN117 | | June 10, 2021 | 3 |
| MN118 | | June 10, 2021 | 4 |
| MN119 | | June 10, 2021 | 1 |
| MN120 | | June 10, 2021 | 1 |
| MN121 | | June 10, 2021 | 1 |
| MN122 | | June 10, 2021 | 1 |
| MN123 | | June 10, 2021 | 1 |
| MN124 | | June 10, 2021 | 1 |
| MN125 | | June 10, 2021 | 1 |
| MN126 | | June 10, 2021 | 1 |
| MN127 | | June 10, 2021 | 1 |
| MR | Mark Razavi | March 25, 2021 | 1 |
| MLE | Mary L. Eninger | June 8, 2021 | 1 |
| ME | Mary Ewell | June 10, 2021 | 14 |
| MG3 | Mary Gaye | April 18, 2021 | 1 |
| MG4 | | June 9, 2021 | 1 |
| MW1 | Mary Watkins | May 1, 2021 | 4 |
| MLW | Mike & Laura Woolsey | June 8, 2021 | 1 |
| MJ | Mike Jamgochian | March 23, 2021 | 4 |
| MP | Mike Patel | April 5, 2021 | 2 |
| MW2 | Mike Woolsey | May 26, 2021 | 1 |
| MW3 | | June 3, 2021 | 1 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| MT1 | Mirna Trujillo | May 11, 2021 | 1 |
| MT2 | | June 2, 2021 | 1 |
| NO | Naomi Onizuka | April 4, 2021 | 1 |
| PA | Pam Absher | June 10, 2021 | 1 |
| PB | Patricia Brown | June 5, 2021 | 4 |
| PW | Patrick Wickens | April 13, 2021 | 1 |
| PS | Paul Schlichting | June 10, 2021 | 9 |
| PBK1 | Phil & Barbara Kiyokane | March 24, 2021 | 2 |
| PBK2 | | June 3, 2021 | 4 |
| PDW | Philip de Wolff | June 4, 2021 | 7 |
| RPQ | Randy & Pamela Quan | June 8, 2021 | 1 |
| RF | Reid Fujinaga | March 24, 2021 | 1 |
| RL | Robert Levy | April 13, 2021 | 1 |
| RTGG1 | Rosann Taylor & Geoff Gilbert | April 6, 2021 | 1 |
| RTGG2 | | May 5, 2021 | 1 |
| RT | Rosann Taylor | June 10, 2021 | 1 |
| RV | Rose Valeriano | April 13, 2021 | 2 |
| SK1 | Sabrina Kerch | June 10, 2021 | 1 |
| SK2 | Sang Kim | June 3, 2021 | 4 |
| SL1 | Sheila Lamb | April 2, 2021 | 1 |
| SL2 | | April 2, 2021 | 1 |
| SL3 | | April 13, 2021 | 4 |
| SL4 | | June 9, 2021 | 7 |
| SW1 | Shirley Wang | June 7, 2021 | 2 |
| SW2 | Simona Wilson | April 8, 2021 | 1 |
| SGD | Stephanie & Gary Dyo | April 13, 2021 | 6 |
| SD | Stephanie Dyo | June 6, 2021 | 5 |
| SI1 | Stephanie Ishioka | June 4, 2021 | 3 |
| SI2 | | June 4, 2021 | 2 |
| SJC | Stephen J. Curwick | June 10, 2021 | 5 |
| SJ | Susan Johnson | May 24, 2021 | 1 |
| SK3 | Susan Kawamoto | April 28, 2021 | 2 |
| SY | Susan Yano | June 10, 2021 | 25 |
| TT | Terry Thomas | May 16, 2021 | 1 |
| TO1 | Tim Ozenne | April 5, 2021 | 1 |
| TO2 | | April 6, 2021 | 1 |
| TO3 | | May 25, 2021 | 1 |
| TO4 | | May 26, 2021 | 7 |

| Comment ID | Name of Commenter | Date Received | Number of Comments |
|---|---|---|---|
| TC | Tiya Choi | April 17, 2021 | 1 |
| VM | Virginia Minami | April 17, 2021 | 1 |
| WC | Warren Croft | May 1, 2021 | 5 |
| WBJYJL | Wei, Brianna, and Jonathan Yu and Joyce Li | June 7, 2021 | 1 |
| WS | Wendy Spadaro | June 7, 2021 | 3 |
| WVS | William & Vivian Shanney | May 24, 2021 | 3 |
| WK | William Kelley | June 9, 2021 | 4 |
| **Oral Comments** | | | |
| MC | Melanie Cohan | March 24, 2021 | 4 |
| CC | Craig Cadwallader | March 24, 2021 | 3 |
| SY | Susan Yano | March 24, 2021 | 5 |
| F | Fred | March 24, 2021 | 1 |
| MN1 | Mark Nelson | April 13, 2021 | 6 |
| GG | Geoff Gilbert | April 13, 2021 | 4 |
| SL | Sheila Lamb | April 13, 2021 | 4 |
| SK | Sabrina Kerch | April 13, 2021 | 3 |
| FVC | Frank von Coelln | April 13, 2021 | 2 |
| M | Michael | April 13, 2021 | 2 |
| AW1 | Ann Wolfson | April 13, 2021 | 1 |
| SY | Susan Yano | April 17, 2021 | 7 |
| AW2 | Ann Wolfson | April 17, 2021 | 3 |
| MN2 | Mark Nelson | April 17, 2021 | 4 |
| BE | Brianna Egan | April 17, 2021 | 4 |
| BW | Brian Wilson | April 17, 2021 | 1 |
| TO | Tim Ozenne | April 17, 2021 | 2 |

## 9.2 MASTER COMMENT RESPONSES

BCHD received a number of similar comments on the Draft EIR, expressing common issues among those submitting written and/or oral comments. To address these common issues, Master Comment Responses were prepared for recurrent topics. The Master Comment Responses provide a means of addressing overarching issues in a more concise manner than providing repetitive responses to individual comments. In some cases, an individual comment may be answered by one or more Master Comment Responses. The Master Comment Responses are presented in this section to supplement individual responses to similar comments. Many individual responses presented below also rely on and cross-reference all or portions of the Master Comment Responses in the individual response to comment.

This section presents the Master Comment Responses, as follows:

### 9.2.1 Master Response 1 – General Opposition to the Project

Several commenters have used the Draft Environmental Impact Report (EIR) comment period as a forum to express disapproval of and/or opposition to the proposed Healthy Living Campus Master Plan (Project) without commenting on the adequacy or technical sufficiency of the environmental impact analysis, mitigation measures, and/or alternatives presented in the EIR. Although not germane to the adequacy of the EIR, as discussed below, these comments have not been rejected (California Environmental Quality Act [CEQA] Guidelines Section 15204[e]). Instead, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project. However, as discussed below, such comments do not address environmental issues, which are the focus of this CEQA-compliant EIR.

CEQA Guidelines Section 15105 requires a 45-day comment public review period for a Draft EIR; however, given the ongoing COVID-19 pandemic and in an interest to facilitate increased levels of public participation, the Beach Cities Health District (BCHD) extended the comment period to 90 days in order to ensure the public had ample time to review and comment. As required by CEQA, during this period BCHD received comments from persons who reviewed the Draft EIR. CEQA Guidelines Section 15204 defines the suggested focus of the review:

> *"In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."*

As described in CEQA Guidelines Section 15151, *"…an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a*

*decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure"* (San Francisco Ecology Center v. City and County of San Francisco, (1975) 48 Cal. App. 3d 584).

Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.). Comments regarding the environmental issues presented in the Draft EIR have been responded to in detail within these responses to comments. Text revisions to the Draft EIR have also been included in the Final EIR in response to comments.

This EIR serves to provide a primary source of environmental information for the BCHD Board of Directors and responsible agencies exercising any permitting authority or approval power directly related to implementation of the proposed Project. However, it is not the purpose of an EIR to recommend approval or denial of the proposed Project. In fact, in order to provide the BCHD Board of Directors, responsible agencies, and interested members of the public with options for consideration, the EIR identifies a reasonable range of alternatives that would substantially reduce or avoid potentially significant impacts as compared to the proposed Project. In particular, the EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only, which is the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), as a means to further reduce potential impacts and address public concerns, at least in part, over the size and scope of the proposed Project. Further, it should be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

### 9.2.2 Master Response 2 – BCHD as Lead Agency

assume lead agency status. As a matter of law BCHD, has the authority and duty to assume lead agency status pursuant to CEQA because it is the public agency with principal responsibility for carrying out the proposed Project (CEQA Guidelines Section 15367). It is irrelevant to this determination that BCHD must apply to another public agency with land use jurisdiction over the Project site for a secondary approval. Such agencies, which have approval authority but do not have principal responsibility for carrying out the proposed Project, are defined by CEQA Guidelines as responsible agencies.

CEQA Guidelines Sections 15050-15053 govern how the lead agency is determined. Pursuant to CEQA Guidelines Section 15051:

> *"Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:*
>
> *(a) If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency."*

Although the Project site is located in the City of Redondo Beach, the proposed Project would be approved and implemented, hence, carried out, by BCHD. For example, the BCHD Board of Directors has the responsibility for approving the proposed Healthy Living Campus Master Plan and implementing the proposed development, including approval of building demolition, construction of new buildings and associated improvements, and operation of the community health facilities, all in compliance with the proposed Healthy Living Campus Master Plan and State law. The only other agencies with responsibilities for discretionary approvals for the proposed Project are the City of Redondo Beach (Design Review and CUP) and possibly the City of Torrance (related to activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way). Ministerial State licenses would also be needed to operate some of the facilities (e.g., proposed Assisted Living program, which are regulated by U.S. Department of Health and Human Services along with the California Department of Social Services). It is typical for larger projects to involve permitting by multiple agencies, and the CEQA Guidelines anticipate that this will often be the case, which is why the role of the responsible agency, which applies to these agencies, was created and is defined in CEQA Guidelines (CEQA Guidelines Section 15096 and 15381).

In addition, CEQA Guidelines Section 15053(a) discusses designation of a lead agency when there are multiple responsible agencies:

> *"If there is a dispute over which of several agencies should be the lead agency for a project, the disputing agencies should consult with each other in an effort to resolve the dispute prior to submitting it to the Office of Planning and Research. If an agreement cannot be reached, any of the disputing public agencies, or the applicant if a private project is involved, may submit the dispute to the Office of Planning and Research for resolution."*

There is no dispute between BCHD and any other agency with regard to which agency should be the lead agency to prepare the Draft EIR for the proposed Project; neither the City of Redondo Beach nor the City of Torrance have asserted lead agency status. Moreover, members of the public are not authorized under the CEQA Guidelines to request the Office of Planning and Research (OPR) to get involved in the designation of a lead agency. Rather, *"dispute,"* for purposes of asking OPR to designate a lead agency, is defined as *"…a contested, active difference of opinion between two or more public agencies as to which of those agencies shall prepare any necessary environmental document"* (CEQA Guidelines Section 15053[b]). Again, there is no such contested, active difference of opinion regarding lead agency status between BCHD, the City of Redondo Beach, the City of Torrance, or any other State or local agencies.

### 9.2.3 Master Response 3 – Project Need and Benefit

Several commenters have stated that there is no real need for senior housing in the Beach Cities and the real objective of the proposed Project is a simple want to generate revenue for the Beach Cities Health District (BCHD). Many of these commenters have stated that seniors prefer to live in their own homes with access to in-home care. Additionally, many commenters have suggested that the Beach Cities and the surrounding communities are already served by a Program for All-Inclusive Care for the Elderly (PACE) and that the provision of such a program as a part of the proposed Healthy Living Campus Master Plan would be duplicative with these existing services. Finally, many of the commenters have contended that there are no seismic hazards or that the issue is overstated and does not need to be addressed as a part of the proposed Project.

However, as discussed under Master Response 1 – General Opposition to the Proposed Project, these comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Rather, these comments express the opinions of the commenters regarding need and benefits of the proposed Project, a matter that has been subject to extensive review and public discussion by BCHD. As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on

serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach and Manhattan Beach as well as tens of thousands within other South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. BCHD expended considerable time and effort researching and evaluating anticipated community health needs in the coming decades, particularly with regard to senior care. The matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, this need for the proposed Project has been discussed in detail at numerous well-noticed public hearings. After careful consideration of projected community health needs over the coming decades, the BCHD Board of Directors identified the proposed Project as a key component to addressing future community health needs and drafted a set of project objectives, which helped define those health needs and project benefits which guided project design. As described in CEQA Guidelines Section 15093, *"CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project."* If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall *"…state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record"* (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

*The Need for Senior Housing*

As noted above, several commenters have questioned the need for senior housing, while not providing substantial evidence to support such assertions. As discussed further below, BCHD has expended considerable time and effort to research and document projected senior housing needs and to develop a proposed Project, which reflects these anticipated needs and demand. As described in Section 2.4, *Project Objectives*, the proposed Project would *"[a]ddress the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces."* The proposed creation of 157 new Assisted Living units is consistent with the Redondo Beach General Plan Housing Element, which aims to enhance existing housing stock and expand housing opportunities for residents (refer to Section 3.12, *Population and Housing*). For example, the proposed Project would be consistent

with Policy 5.2, which specifically aims to provide housing that meets the special needs of seniors and the disabled.

In order to ensure that community health needs are met, BCHD commissioned a Market Feasibility Study by MDS Research Company, Inc. to assess projected future community health needs and the demand for the proposed Assisted Living and Memory Care units. As described in the study, the demand modeling is conservative, realistic, and gives consideration to all of the relevant key factors and assumptions with regard to this very specialized type of living arrangement. For example, the study assesses the potential market for the Assisted Living program by identifying the number of households with persons ages 75+, but conservatively excludes the number of households headed by a person who is not age 75+ (e.g., adult children, relatives, etc.) that could reasonably provide in-home care. The study also screens out those persons ages 75+ who reside in group quarters, nursing homes, or other institutionalized settings that already provide in-home care. Within that potential market for the Assisted Living program, the study considers the estimated need for assistance with the daily living activities (e.g., bathing, dressing, etc.) – exclusive of income qualification and consideration of existing competitive service offerings. This potential market was then adjusted to include only those income-qualified households based on annual after-tax cash flow income alone – exclusive of economic support by children and spend-down of assets. Accounting for existing and planned senior housing communities in the vicinity of the Project site, the 2019 Market Feasibility Study concluded that the proposed Assisted Living units and Memory Care units are needed, would meet an important community health need, and would be filled following the completion of the proposed Residential Care for the Elderly (RCFE) Building described for the Phase 1 preliminary site development plan.

*The Need for Program of All-Inclusive Care for the Elderly (PACE) Medical Services*

BCHD has also conducted exhaustive research regarding assistance for seniors who choose to remain in their own home, but require substantial support to do so. In fact, several commenters voicing opposition to the Assisted Living program component of the proposed Project have cited this need. As described in Section 2.0, *Project Description*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services to older adults – involving a combination of adult day care center services and in-home care services. PACE is intended to allow older adults to remain in the community rather than receive care in an Assisted Living facility. As described in Section 2.0, *Project Description* and as shown on the National PACE Association website, there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located within any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional

need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

*Seismic Safety of the Beach Cities Health Center and Beach Cities Advanced Imaging Center*

Several commenters have asserted that the older buildings on the BCHD campus are not in danger of damage from seismic activity; however, they have neither directly contested the findings of the geotechnical studies prepared by registered professional geologists Nabih Yousef Associates nor submitted substantial evidence to support such claims.

As described in Section 2.1, *Introduction* and Section 2.4.2, *Project Background*, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This *Beach Cities Health District Seismic Assessment* is referenced in the EIR in Section 7.0, *References* and is publicly available at https://www.bchdcampus.org/sites/default/files/archive-files/January-2018-Nabih-Youssef-and-Associates-Presentation_CWG.pdf. This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the *Beach Cities Health District Seismic Assessment* and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). For example, as described, as described in Section 3.6, *Geology and Soils*, *"[t]he Beach Cities Health Center, formerly the South Bay Hospital, is a 60-year-old, non-ductile concrete building. The original 4-story (north) tower was constructed in 1958 and the 4-story addition (south tower) was constructed in 1967. Both of these towers were constructed with non-ductile concrete roofs, floors, and poorly reinforced columns, making them susceptible to collapse in the event of an earthquake."* These buildings were designed and constructed in conformance with building code requirements at the time of construction; however, the building code requirements have since evolved substantially based on research, best practices, and experience from previous earthquakes. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of

Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

The EIR acknowledges that the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission (refer to Section 2.4.2, *Project Background*). Revenues from the long-term tenant leases support BCHD community health programs and services, such as the Community Services program, the Center for Health and Fitness, and the Beach Cities Partnership for Youth. However, BCHD's ability to attract tenants has diminished in recent years, in part because of the specialized nature of the former South Bay Hospital Building, which cannot be easily renovated to conform to tenant needs. Therefore, even if simply seismically retrofitting the Beach Cities Health Center were financially feasible, it would not address these additional issues associated with providing purpose-built facilities for outpatient medical services and other community health and wellness needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD's community health and wellness programs and services.

### 9.2.4 Master Response 4 – Project Objectives

Many commenters have suggested that the project objectives stated in the Draft Environmental Impact Report (EIR) are contrived in way to only support the proposed Healthy Living Campus Master Plan and that they do not support the community health and wellness mission of the Beach Cities Health District (BCHD). However, as discussed in more detail below, the project objectives directly reflect BCHD's primary mission to support community health and wellness by providing needed housing and long-term care to seniors as well as generating revenue to support BCHD's broader range of community health programs and services.

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15124(b) the objectives of a project are intended to *"…help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits."* As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD's programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD's continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use spaces (e.g., Center for Health and Fitness, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

The project objectives presented in Section 2.4.3, *Project Objectives* accurately describe the underlying purpose of the proposed Project. For example, Project Objective 1 describes that the one of the purposes of the proposed Project is to eliminate seismic safety and other hazards of the former South Bay Hospital Building. The financial drivers of the proposed Project, which are clearly linked to BCHD's ability to provide community health and wellness services, are also plainly stated in Project Objective 2 (Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services). Project Objective 6 (Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs) is also clearly linked to BCHD's primary mission to continue providing high-quality community health programs and wellness programs and services. As described at length in the EIR, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. These revenues from the long-term tenant leases support existing BCHD community health and wellness programs and services provided to BCHD's service population of more than 123,000 people within Redondo Beach, Hermosa Beach and Manhattan Beach as well as tens of thousands within other South Bay communities. The combined cost of a seismic retrofit and renovations necessary to continue to attract mission-oriented tenants would

render such a dual undertaking economically infeasible, especially if done without the revenue generated by the existing tenants in the Beach Cities Health Center. Additionally, Project Objectives 3, 4, and 5 describe the purposes of the proposed Project to provide flexible, multi-use spaces and specialized facilities to support the BCHD innovative and constantly evolving programs necessary to serve the future needs of the community. Specifically, these project objectives describe that the proposed Project is intended to provide public open space, integrated assisted living facilities, and a modern campus with meeting spaces for public gatherings and interactive education.

The project objectives presented in the EIR clearly meet the requirements of CEQA Guidelines Section 15124(b). It should also be noted that these project objectives have been appropriately used to develop a range of feasible alternatives that would substantially reduce significant impacts associated with the proposed Project while still accomplishing most of the basic project objectives (refer to Section 5.0, *Alternatives*). The EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only as the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), because it would reduce the total duration of the significant and unavoidable construction-related noise impact. This alternative would also incorporate an alternative circulation scheme that would avoid any potential conflicts associated with vehicle access along Flagler Lane. Further, this alternative addresses public concerns, at least in part, over the size and scope of the proposed Project.

### 9.2.5 Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units

Some commenters have stated an opinion on the cost and affordability of the Assisted Living units and Memory Care units that would be provided in the proposed Residential Care for the Elderly (RCFE) Building. While this is not an environmental issue and not germane to the adequacy of the Environmental Impact Report (EIR), because of the potential relationship to population and housing issues, the results of the three detailed market studies prepared by BCHD are summarized below.

BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three detailed market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach. These market studies can be found in their entirety at the Beach Cities Health District (BCHD) website here: https://www.bchdcampus.org/campus. Field work and analyses were originally completed in April 2016, updated in August 2018, and updated again May 2019 to reflect the revised number and type of senior housing units included in the proposed Project.

Each of prepared studies – which identified monthly service fee price ranges using existing market rates – concluded that there is sufficient size and depth of the qualified target market to introduce the proposed number of senior housing units. As described in the May 2019 study, the rationale behind the income qualifying criteria is based on the assumption that seniors typically spend 40 to 45 percent of their annual cash flow income on market rate monthly fees for service-free or service-optional independent living, 65 to 70 percent for market rate monthly service fees or rental rates for service-enriched independent living, 75 to 80 percent for assisted living monthly service fees, and 85 to 90 percent for Alzheimer's/memory care or nursing/health care. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area.

At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. Cain Brothers also compared the pricing levels in the MDS market study with the actual monthly fees at the existing Silverado Memory Care Facility on the campus and the Sunrise Assisted Living Facility in Hermosa Beach and verified the reasonableness of the proposed pricing level. Since the 2019 study, the number of proposed Assisted Living units and Memory Care units has been updated again and a pricing schedule has not yet been determined. However, the pricing of the proposed senior living units will ultimately be consistent with prevailing market rates.

### 9.2.6 Master Response 6 – Financial Feasibility/Assurance

Several commenters stated that the description of the proposed Project and/or the environmental impact analysis provided within the Environmental Impact Report (EIR) should include a quantification of economic characteristics including a rigorous quantification of the Beach Cities Health District (BCHD) economic characteristics, evaluation of development financing strategy, profit analyses, financial error analyses, etc. Many commenters asserted that due to the cost of the units, they would not be filled following the completion of construction, the proposed Project would fail to generate sufficient revenue, and the proposed Project may ultimately fail. As described further below, although economics is not generally recognized as an environmental issue under CEQA, BCHD has expended substantial effort on studies to document the economic characteristics of the proposed Project and their relationship to provision of community health and

wellness programs and services to the residents of the Beach Cities and the nearby South Bay communities; these studies and presentation materials can be found here: https://www.bchdcampus.org/campus.

These comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. While the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a *"...general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"...supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). CEQA Guidelines Section 15131, also specifically states *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."*

CEQA requires that a lead agency determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record, and *"...evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence"* (Public Resources Code Article 11, Section 21082.2[c]). Commenters concerned with the economic and financial capabilities of BCHD appear to assert that the EIR must include analysis of the economic characteristics of the proposed Project, including the ability or inability of BCHD to fund and implement the proposed improvements. However, these issues are not directly associated with the physical impacts on the environment. As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR. Further, assertions that BCHD would be unable to fund the proposed Project, that the proposed Project would fail financially, or that that foreclosure of the property and inability to complete the proposed Project following initiation of construction activities would result in environmental damages and loss of public land are unsubstantiated, not supported by substantial evidence in the record, and were therefore deemed speculative. CEQA Guidelines Section 15384[a] states that *"[s]ubstantial evidence does not include 'argument, speculation, unsubstantiated opinion or native, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are caused by physical impacts on the environment'"*

It is worth noting that BCHD has very clearly and consistently demonstrated that the funding necessary to implement the proposed Phase 1 preliminary site development plan, which is anticipated to cost $235 million, is secured. These funds consist of revenue generated by property assessments, BCHD's health and fitness facilities, and tenant space within the Beach Cities Health Center, as well as leases, partnerships, grants. As described in Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, Cain Brothers reviewed this development strategy. The results of this review have been discussed at numerous well-noticed public meetings and the complete analysis can be found in their entirety here: https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf. While funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the Residential Care for the Elderly (RCFE) Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory Care community as well as the Program of All-Inclusive Care for the Elderly (PACE) within the RCFE Building. In addition, BCHD would continue to be able to seek and secure appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

### 9.2.7 Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation

The issue of whether the proposed Project is appropriate for a parcel with a P-CF (Community Facility) zoning and land use designation has been raised by a number of commenters. Several of these comments have suggested that BCHD is proposing a market-rate, for-profit facility and that land zoned as P-CF (Community Facility) should not be used for private development enterprises that belong in commercial zones.

The existing Beach Cities Health District (BCHD) campus is designated as P (Public or Institutional) by the Redondo Beach General Plan and zoned as P-CF (Community Facility) under the Redondo Beach Zoning Ordinance. The P designation is comprised of lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. Specific purposes of the P (Public and Institutional) zone regulations are to provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well

as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted on P-CF zones with a conditional use permit (CUP). A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory Care Community. The proposed Project – like other improvements made on the campus in the past – would require a CUP under existing code. As described in RBMC Section 10-2.1116 the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes.

### 9.2.8 Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis

Several comments on the Draft Environmental Impact Report (EIR) question the use of a programmatic analysis for the Phase 2 development program described in the proposed Healthy Living Campus Master Plan. These comments assert that the description of the Phase 2 development program is vaguely defined and not analyzed to an appropriate level of detail. However, CEQA specifically allows for such programmatic analysis, particularly for phased projects, and the EIR closely adheres to CEQA guidance on such matters as described further below.

As discussed in Section 1.1, *Overview,* the Environmental Impact Report (EIR) evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. The complete description of both the Phase 1 preliminary site development plan and the Phase 2 development program is provided in Section 2.5, *Proposed BCHD Healthy Living Campus Master Plan*, and is based upon the published version of the Healthy Living Campus Master Plan prepared by Paul Murdoch Architects under the direction of the Beach Cities Health District (BCHD). The Healthy Living Campus Master Plan is publicly available here: https://www.bchdcampus.org/campus.

This approach to analysis is not uncommon, and is in fact specifically called for under California Environmental Quality Act (CEQA) Guidelines Section 15165:

> *"Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect."*

Guidance on the preparation of EIRs that analyze projects at both a project level of detail, and a programmatic level of detail is provided under Article 11 of CEQA Guidelines. Specifically, CEQA Guidelines Section 15160 states that there are *"…a number of examples of variations in EIRs as the documents are tailored to different situations and intended uses. These variations are not exclusive… [and] Lead Agencies may use other variations consistent with the Guidelines to meet the needs of other circumstances."* A project EIR is defined as *"[a] type of EIR [that] should focus primarily on the changes in the environment that would result from the development project"* (CEQA Guidelines Section 15161), while a program EIR is defined as *"…an EIR which may be prepared on a series of actions that can be characterized as one large project and are related..."* (CEQA Guidelines Section 15168). Generally, a program EIR analyzes a project for which less specific detail is currently known, but would be developed at a later date. If, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, as needed, which would involve *"…narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Such is the case for Phase 2 of the proposed Project, for which a single detailed preliminary site development plan and construction information has not yet been developed. This is due to two primary factors: 1) as described in Section 2.0, *Project Description*, the Phase 2 development program would be implemented at least 5 years after the development under Phase 1; and 2) the programming in Phase 2 and the associated development is intended to respond to the Community Health Report and priority-based budgeting efforts to meet constantly evolving community health and wellness needs in the Beach Cities and the nearby South Bay communities. As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan. This approach is often used by lead agencies – including local municipalities – when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans existing for later improvements. There are several advantages that can be attributed to this approach, including allowing for *"…the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts"* (CEQA Guidelines Section 15168[b][4]). In the event that later *"tiered"* analysis is determined necessary for the Phase 2 improvements, the lead agency *"…shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program"* (CEQA Guidelines Section 15168[c][3]).

With regard to analysis of the potential impacts of proposed Phase 2 improvements, particularly with regard to analysis of aesthetic and visual resource impacts, the EIR includes an appropriate level of detail necessary to inform the range of potential impacts and programwide mitigation measures consistent with the requirements of CEQA. For instance, the analysis of aesthetics and visual resources impacts in Section 3.1, *Aesthetics and Visual Resources,* provides visual simulations for three separate example Phase 2 site plan scenarios for illustrative purposes and to help inform the programmatic analysis. However, as noted in the analysis, due to uncertainties in the ultimate programming and site plan associated with the Phase 2 development program, the potential impacts to visual character and quality of public views in Phase 2 are discussed programmatically. The EIR depicts these three example site plan scenarios under Impact VIS-2, and provides detailed discussion as to where the proposed improvements would be visible to the public and how these improvements may obstruct or otherwise affect existing views. While the EIR does not include photosimulations such as those provided for the Phase 1 improvements, precise photosimulations are not mandatory for determining the potential impacts or mitigation measures applicable to the Phase 2 development program. As previously described, preparation of

a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements. It should also be noted that the proposed development under Phase 2 – like any other improvements made on the BCHD campus – would be subject to a Planning Commission Design Review (Redondo Beach Municipal Code [RBMC] Section 10-2.1116).

### 9.2.9 Master Response 9 – Aesthetics and Visual Resources Analysis

Numerous comments received on the Draft Environmental Impact Report (EIR) – particularly those received from adjacent property owners in the single-family residential neighborhood to the east within the City of Torrance – involve or are related to the aesthetics and visual resources analyses. In particular these comments assert that the bulk, scale, and mass of the development described for the proposed Healthy Living Campus Master Plan is too large and would result in adverse impacts related to existing views from single-family neighborhoods, obstruction of open sky views, neighborhood compatibility, privacy, and shade/shadows.

The EIR thoroughly assesses the impacts associated with aesthetics and visual resources that could result from construction and operation of the proposed Project in Section 3.1, *Aesthetics and Visual Resources*. As described therein, the analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x, professional architects and visual simulation specialists, for the Phase 1 preliminary site development plan. Additionally, the analysis addresses representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. These photosimulations and representative views were reviewed in the context of CEQA as well as the relevant development standards and municipal code sections. Based on the comments received during the 30-day public scoping period, this discussion also includes an analysis of potential impacts related to shading of adjacent shadow-sensitive uses. A shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M). Under the California Environmental Quality Act (CEQA), aesthetic impacts are qualitative in nature, and generally occur where physical changes would conflict with adopted development standards and would substantially degrade the visual character or quality of public views of the site and its surroundings as set forth in Appendix G of the CEQA Guidelines.

*Height and Size of the Proposed RCFE Building*

The existing Beach Cities Health Center and medical office buildings on the Project site, which in range in height from 1 to 5 stories, represent the existing physical environmental setting of the

Project site against which changes and potential Project impacts must be assessed. As described in Section 3.1, *Aesthetics and Visual Resources*, the former South Bay Hospital, which reaches a height of 76 feet above the existing ground level of the BCHD campus, was originally developed in 1958 and since that time has contributed to the overall character of the surrounding area, rising above the adjacent by low-rise commercial and multi-family residences to the north, single-family residences to the west, south, and east. The distinct façades of the buildings, with their white concrete columns and blue/black tinted windows that form horizontal stripes across the buildings, are highly visible from many adjacent public roads, sidewalks, and other public viewing locations. These buildings also provide a familiar sight for people in the immediate vicinity, including residences that are located immediately adjacent to the existing Beach Cities Health District (BCHD) campus.

The development of the proposed Residential Care for the Elderly (RCFE) Building and subsequent demolition of the Beach Cities Health Center would result in a change in the existing views across the existing campus, replacing the existing highly visible structures with new structures of similar height, bulk, and scale. While the proposed development would be visible, views of the Project site would not change substantially from locations where intervening structures would obstruct the RCFE Building, such as along Tomlee Avenue (Representative View 1). While the building would be visible above the single-family homes, the overall intrusion into open sky views above these homes would be minor. Development of the RCFE Building also would not substantially alter views of the Project site from North Prospect Avenue (Representative View 5) due to the setback of the building from this location and proposed landscaping, which would partially obscure views of the interior of the campus. As shown in the comparison photographs and photosimulations in the discussion under Impact VIS-2, the proposed RCFE Building would be most visually prominent from Flagler Lane near Towers Street (Representative View 2) and Beryl Street (Representative View 3), and along Beryl Street in front of the Redondo Village Shopping Center (Representative View 4). Although the existing Beach Cities Health Center is highly visible or even visually dominant, the proposed RCFE Building would be substantially larger and more prominent than the existing structures on the campus. The environmental impact analysis provided in the EIR acknowledges that the proposed RCFE Building, when viewed from Representative Views 2, 3, and 4, would be located closer to the edges of the campus and would appear substantially taller with substantially more massing than the existing buildings on the campus as well as the other existing buildings.

As described under Impact VIS-2, the existing development on the campus is barely visible from Flagler Lane at Representative View 2. This view is primarily characterized by the open sky above the existing slope, retaining walls, and mature landscaped trees. The proposed RCFE Building

would be visually prominent from this viewpoint, rising above the retaining walls and landscaping along eastern slope in the mid-ground. The proposed 6-story RCFE Building would be substantially larger than the existing 1- to 5-story buildings currently on-site as well as the adjacent 1- to 4-story buildings. The proposed RCFE Building would substantially reduce access to open sky from this view, and would change the visual character of this view from the public streets and sidewalks in the single-family residential neighborhood to the east as well as travelers along Flagler Lane and Towers Street. However, due to the location of the Project site along the northern perimeter of the campus, approximately half of the open sky view would remain. Further, the proposed landscaping surrounding the RCFE Building as well as along the eastern border of the campus would provide intermittent large shade canopy trees and smaller shade trees. The landscaping would partially screen and would soften views of the RCFE Building from this location, particularly for the lower floors of the building. Therefore, although the height and mass of the proposed RCFE Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

From Representative View 3, views of the existing Project site are characterized by the vacant Flagler Lot, which is currently covered with gravel and weedy vegetation and is leased as a staging area for construction equipment. Any development on the vacant Flagler Lot would be characterized as a change, due to its undeveloped nature. Given the height of the proposed RCFE Building and its proposed location along the northern perimeter of the campus, the building would be visually prominent from this location. Nevertheless, the proposed Project would comply with applicable zoning and regulations governing scenic quality. The proposed buildings would comply with the required building height prescribed in Redondo Beach Municipal Code (RBMC) Section 10-2.622, and would provide visual interest with design elements that would add varied composition and texture to the proposed RCFE Building. The Phase 1 preliminary site development plan would enhance the street level character at the intersection of Beryl Street & Flagler Lane by providing flowering street trees and a tiered staircase facing Beryl Street, which would lead to the central area of campus. While the Phase 1 preliminary site development plan would remove existing on-site landscaping, the proposed development under Phase 1 would include new landscaping surrounding the RCFE Building as well as along the frontages with Flagler Lane and Beryl Street to provide shade and visual benefits associated with the dense canopy and foliage. The proposed landscaping as well as public views of and pedestrian passage to active green spaces located within the central campus area of the Project site would activate and improve the pedestrian character of Beryl Street. Further, views of the landscaped open air dining

terrace atop the first floor of the RCFE Building would contribute to a more pedestrian friendly environment along Beryl Street by inviting visitors to the campus. Therefore, implementation of the Phase 1 preliminary site development plan would alter views, but would not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

Views of Beryl Street from Representative View 4 are characterized by the four travel lanes and wide pedestrian crosswalks as well as the large canopy trees adjacent to the pedestrian sidewalks on the south side of the street. Views of the Project site from this location include the existing 5-story Beach Cities Health Center and the upper west corner of the Providence Little Company of Mary Medical Institute Building along with the large trees that border the northern perimeter of the Project site. Implementation of the Phase 1 preliminary site development plan would noticeably alter the existing views of the Project site from this location. The existing Redondo Village Shopping Center would form a step-down to the street level along Beryl Street. However, the environmental impact analysis provided in the EIR acknowledges that the location of the proposed RCFE Building along the northern perimeter of the Project site would result in additional bulk and mass when compared to the existing development on the campus. Therefore, the perceived height of the RCFE Building from the pedestrian perspective would be more pronounced from this location. (As described further in the neighborhood compatibility discussion below, it should be noted that the bulk and mass of the proposed RCFE Building was concentrated in this area of the campus in order to reduce the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance.)

The proposed RCFE Building would obstruct views across the Project site and reduce access to open sky. However, the building would be partially screened by existing large canopy trees along Beryl Street. The proposed landscaping surrounding the RCFE Building would also provide some screening to soften views of the Project site's street frontage from this location. While the massing of the proposed RCFE Building would be greater than existing conditions, the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from this location.

In summary, development of the proposed RCFE Building would substantially alter existing views of and across the Project site from representative views surrounding the site. However, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

*Compatibility with the Surrounding Neighborhood Character*

As described in Section 1.6, *Project Background*, since the inception of the proposed Project in 2017, BCHD has been dedicated to engaging in public outreach, including forming a 20-person Community Working Group (CWG) to represent the various populations and organizations in the Beach Cities and engage local participants in the planning of proposed redevelopment. The proposed Project was developed as a result of more than 60 meetings hosted over a 3-year period and attended by more than 550 community members.

Community feedback received from such outreach efforts has helped guide revisions to the conceptual plans for the proposed Healthy Living Campus Master Plan, which was originally released to the public in June 2017. The original site plan included a 6-level parking structure on the vacant Flagler Lot, a 7-story assisted living building, and a 4-story independent living building over 3 levels of parking. Community feedback was received on issues relating to building height, density of development, and the proximity of the proposed development to adjacent single- and multi-family residential land uses. To address these issues, the 2019 Master Plan refined the original conceptual plan by removing the proposed parking structure from the vacant Flagler Lot, relocation of the parking to the southeast corner of the campus, and reducing the height of the RCFE Building to 4 stories by wrapping the building footprint along the eastern boundary of the campus.

Following additional community outreach efforts for the 2019 Master Plan, including a second community Open House in March 2019 and five public scoping meetings in July 2019, BCHD received comments regarding the views of the proposed buildings from the surrounding residential neighborhoods. BCHD also received comments regarding potential construction-related impacts to neighbors, which included concerns over the duration of construction (i.e., three individual 3-year long phases spanning a period 15 years) as well as potential impacts related to air quality, hazards and hazardous materials, noise, and construction vehicle traffic given the adjacency of the RCFE Building to the single-family neighborhood to the east within the City of Torrance.

In response to the community's concerns described above, BCHD revised the footprint of the RCFE Building was further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700

square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

As described in Section 3.1, *Aesthetics and Visual Resources,* the proposed Project would comply with the required building height prescribed in Redondo Beach Municipal Code (RBMC) Section 10-2.622, and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. While the design guidelines only apply to buildings and structures in the R-2, R-3, R-3A, RMD, RH-1, RH-2, and RH-3 multiple-family residential zones, they have been conservatively applied to the 217 Assisted Living units and Memory Care units proposed for the RCFE Building. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Aside from the subjective contention that the proposed RCFE Building would be out of place, none of the comments contest the consistency of the proposed Project with these policies, which are used as the threshold for impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*).

*Shade and Shadow Effects from Proposed RCFE Building*

As described under Impact VIS-4 in Section 3.1, *Aesthetics and Visual Resources*, the proposed 6-story RCFE Building would reach a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below. This would be the tallest building included in either Phase 1 or Phase 2 of the proposed Healthy Living Master Plan, casting shadows up to 404.5 feet long during the Winter Solstice. Therefore, the proposed Project would create longer and more extensive shadows than the existing buildings on the campus.

Shadow-sensitive land uses adjacent to the Project site consist of residential buildings, including windows and yards at most single-family residences, Towers Elementary School to the east, and Dominguez Park to the northeast. The shade and shadow study prepared for the proposed Project demonstrates that the adjacent residential structures in Torrance, including on Towers Street,

Tomlee Avenue, Mildred Avenue and Redbeam Avenue, would be shaded beyond existing shadows, particularly during the Fall and Winter evenings, as a result of the development under Phase 1 and Phase 2 (see Appendix M). However, the vast majority of the residences in neighborhood to the east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the campus and the Torrance residences below.

The multi-family residential buildings adjacent to the north of the Project site would be shaded by the proposed RCFE Building beyond existing shadows during the early morning hours (i.e., 8:00 a.m. or earlier) in the Winter, due to the proximity of the residences to the Project site. However, by 10:00 a.m., the multi-family residences would not be shaded. Further, the proposed RCFE Building would not cast shadows over these residences in the Spring, Summer, and Fall (refer to Figure 3.1-3).

During the Fall and Winter, the proposed RCFE Building would also cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). The latest dismissal time for Towers Elementary School students is at 3:12 p.m. for 4$^{th}$ and 5$^{th}$ graders; however, and Towers Elementary School closes at 4:00 p.m. Therefore, shadows cast by the proposed RCFE Building would not have a significant adverse effect on Towers Elementary School.

Based on the shade and shadow study prepared for the proposed Project, the RCFE Building would also cast shadows along the southern edge of Dominguez Park during the evening hours (i.e., after 4:00 p.m.) in the Winter. However, the portion of Dominguez Park that would be shaded is comprised of a steep vegetated slope that does not provide any recreational opportunity and is fenced off from the rest of the park to the north. Consequently, the proposed Project would not generate shading that would affect shadow-sensitive receptors at Dominguez Park.

None of the shade and shadows impacts would exceed the thresholds established in the EIR, that a significant shade and shadow impact would occur *"…if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October)."*

*Privacy Comments Regarding the Proposed RCFE Building*

As described in Section 3.1.3, *Impact Assessment and Methodology*, only public views, not private views, need be analyzed under CEQA. In 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views are not considered under CEQA (Public Resources Code Section 21082.2).

A number of public scoping comments addressed the issue of privacy for adjacent residential areas. While CEQA requires an assessment of impacts to public views rather than private views and privacy, the following discussion is provided for informational purposes in response to these comments. The existing campus, which was originally developed in 1958, currently provides views across the single-family residential neighborhood to the east as a result of the existing topography (i.e., the campus ground level is approximately 30 feet higher than the ground level in the adjacent neighborhood). Many of the backyards in the first row of residences adjacent to the campus are visible from the fourth and uppermost floor of the Beach Cities Health Center under existing conditions. As described in Section 1.0, *Introduction*, the proposed RCFE Building would be sited along the northern perimeter of the campus behind the Redondo Village Shopping Center. This proposed siting located reduces the proposed building massing along the eastern boarder of the campus adjacent to the single-family residential neighborhood within the City of Torrance. While residential areas would still be visible from some areas of the campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

### 9.2.10 Master Response 10 – Air Quality Analysis

A large proportion of the comments received on the Draft Environmental Impact Report (EIR) – particularly those received from adjacent property owners in the single-family neighborhood to the east of the Project site in the City of Torrance. Numerous comments received on the Draft Environmental Impact Report (EIR) – particularly those received from adjacent property owners within the single-family residential neighborhood to the east – involve or are related to the duration of construction-related emissions and potential impacts on sensitive receptors. Some of the commenters assert that the EIR understates and minimizes the long-term effects of air pollutant emissions (e.g., the potential for suspended particulate matter [$PM_{10}$] to exacerbate asthma) and does not thoroughly address cumulative long-term health impacts. Some comments concern the

enforceability of mitigation measures that have been required to reduce impacts to less than significant levels.

The EIR assesses the impacts associated with air pollutant emissions from construction and operation of the proposed Project in Section 3.2, *Air Quality*. As described in Section 3.2, *Air Quality* Redondo Beach and Torrance – including the Project site – are located within Source Receptor Area (SRA) 3, which covers southwestern coastal Los Angeles County. Ambient air pollutant concentrations within SRA 3 are monitored at the 7201 West Westchester Parkway Monitoring Station, which is located approximately 7.57 miles north of the Project site. Of the six criteria air pollutants, ambient concentrations of carbon monoxide (CO), ozone ($O_3$), nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), and $PM_{10}$ are monitored in SRA 3. Measurements of fine particulate matter ($PM_{2.5}$) are taken in SRA 4 at the South Long Beach 1305 East Pacific Coast Highway Monitoring Station. As shown in Table 3.2-3, the Federal and State ambient air quality standards for CO, $O_3$, $NO_2$, $SO_2$, and $PM_{10}$ were not exceeded in SRA 3 in 2019 (the most recent year data is available), with the exception of 2 days out of the year in 2019 for $PM_{10}$. The ambient concentration of $PM_{2.5}$ in SRA 4 (the nearest SRA in which $PM_{2.5}$ is measured) did not exceed Federal standard in 2019. Therefore, overall existing air quality in the vicinity of Project site is well within the Federal and State ambient air quality standards for criteria air pollutants, which were established to protect the public health and welfare.

As described in Section 3.2.1.5, *Sensitive Receptors*, the majority of development within Redondo Beach and Torrance consists of residential uses, including large single-family residences and multi-family apartments and condominiums, all of which are considered sensitive land uses with regard to air quality. Residential uses are located to the north, south, east, and west of the Project site as close as 80 feet to the Project site. The following 11 schools within 0.5 miles (approximately 2,640 feet) of the Project site: Beach Cities Child Development Center (preschool), Towers Elementary School, Beryl Heights Elementary School, Redondo Shores High School, Redondo Beach Learning Academy, Redondo Union High School, Jefferson Elementary School, Parras Middle School, Our Lady of Guadalupe School, Valor Christian Academy, and West High School. There are also many public parks in the vicinity, including Dominguez Park, Sunnyglen Park, Entradero Park. The existing 60 Memory Care units associated with the Silverado Beach Cities Memory Care Community on the Project site would also be sensitive to construction emissions during construction activities associated with the Phase 1 preliminary site development plan. The nearest sensitive receptors to the Project site are the Silverado Beach Cities Memory Care Community and outpatient medical offices located on the Beach Cities Health District (BCHD) campus as well as the single-family residences located as close as 80 feet to the Project site.

The analysis of construction and operational emissions resulting from Phase 1 and Phase 2 of the proposed Project considers the impacts of air pollutant emissions affecting these sensitive receptors in the vicinity of the Project site. For example, the analysis of localized construction emissions under Impact AQ-2 describes that nearby residents as well as people using the recreational facilities located near the Project site, particularly the elderly and children, could experience adverse health effects from CO, $NO_x$, $PM_{10}$, or $PM_{2.5}$, if concentrations of these criteria pollutants exceed the applicable localized significance thresholds (LSTs), which account for potential human health effects from criteria air pollutants. LSTs for receptors located within 25 meters (i.e., approximately 82 feet) from the Project site in SRA 3 were used to determine if the construction emissions associated with Phase 1 and Phase 2 of the proposed Project would result in exceedance of the LSTs (refer to Table 3.2-6 in Section 3.2, *Air Quality*). The construction emissions associated with Phase 1 and Phase 2 of the proposed Project were estimated using the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod), as prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. As shown in Table 3.2-6, the Phase 1 construction emissions would exceed LSTs for $PM_{10}$ and $PM_{2.5}$; therefore, air quality impacts to sensitive receptors related to localized temporary construction-related emissions would be potentially significant for the Phase 1 preliminary site development plan and less than significant for the Phase 2 development program.

Implementation of Mitigation Measure (MM) AQ-1 would require that Beach Cities Health District (BCHD) prepare and implement an Air Quality Management Plan during all construction-related activities, which shall be approved by the City of Redondo Beach and the City of Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. As required by MM AQ-1, the plan would, at a minimum, include the following conditions for construction:

- Construction equipment engines shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.
- All construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction to reduce the amount of particulate matter entrained in the ambient air. These measures include the following:
    - Quick replacement of ground cover in disturbed areas.
    - Watering of exposed surfaces three times daily.
    - Watering of all unpaved haul roads three times daily.

  - Covering all stock piles with tarp.
  - Post signs on-site limiting traffic to 15 miles per hour (mph) or less on unpaved roads.
  - Prohibit demolition when wind speed is greater than 25 mph.
  - Sweep streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads.
  - Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.
  - Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip.

- Construction activities associated with the proposed Project shall use U.S. Environmental Protection Agency (USEPA) Tier 4 engines on all construction equipment, except crushing equipment, which would reduce DPM emissions from combustion by 94 percent for Phase 1 and 79 percent for Phase 2 construction.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.

MM AQ-1 was revised in the Final EIR to describe the methods of mitigation enforcement that shall apply to the proposed Project during construction. Specifically, MM AQ-1 was revised to describe that *"[c]onstruction contractors shall ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD shall demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction.*"

As shown in Table 3.2-7 in Section 3.2, *Air Quality*, implementation of MM AQ-1 would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD LSTs, with associated avoidance of potential impacts to human health. Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions and potential effects on human health would be less than *significant with mitigation*.

Localized operational emissions were also modeled to assess the operational air quality impacts to sensitive receptors in the vicinity of the Project site. As described under Impact AQ-3, the

operational emissions associated with the proposed Project would not exceed LSTs for CO, $NO_x$, $PM_{10}$ and $PM_{2.5}$. These results indicate that the proposed Project would not generate levels of operational emissions that would adversely affect local air quality and public health, including residents of nearby neighborhoods, local parks and schools and onsite residents of 60 Memory Care units associated with the Silverado Beach Cities Memory Care Community. Therefore, this impact would less than significant for both Phase 1 preliminary site development plan and the Phase 2 development program.

In addition to the analysis of localized construction and operational emissions, Section 3.2, *Air Quality* includes an analysis of toxic air contaminants (TACs), as assessed in the construction Health Risk Assessment (HRA) prepared by iLanco for the proposed Project (refer to Appendix B). As described in Section 3.2.3.2, *Methodology*, the construction HRA quantifies the potential cancer risks and non-cancer chronic health impacts (e.g., asthma and other respiratory diseases) that could affect sensitive receptors exposed to TACs from the proposed construction activities associated with Phase 1 and Phase 2 of the proposed Project. The primary TAC that contributes to health risks is diesel particulate matter (DPM or fugitive dust). The preparation of the construction HRA was conducted by: 1) calculating TAC emissions; 2) determining maximum TAC concentrations at sensitive receptors via air dispersion modeling; 3) quantifying health risks associated with those maximum concentrations; and 4) comparing those health risks to SCAQMD's thresholds of significance. CalEEMod, the standard SCAQMD-accepted model, was used to quantify emissions from anticipated construction activities. The USEPA's AERMOD dispersion model, the accepted model used by Federal, State, and local regulatory agencies, was used to model the movement of air pollutants. This analysis considered various parameters, including configuration of the construction equipment, terrain elevation, meteorological conditions (i.e., localized wind patterns), and the location of sensitive receptors in relation to the site. The California Air Resources Board's (CARB's) Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool was used to calculate cancer risk and non-cancer health impacts. HARP is the accepted model used to calculate cancer risk and non-cancerous chronic health impacts. HARP's Risk Assessment Standalone Tool module was used in this analysis to evaluate cancer risk and non-cancer chronic effects associated with the receptors noted above. Given that the proposed Project is estimated to be constructed over a period of 6 calendar years (i.e., 2022, 2023, 2024, 2029, 2030, and 2031), the exposure duration for this assessment was 6 years (i.e., 3 years for Phase 1 and 3 years for Phase 2). Therefore, the construction HRA assesses the long-term construction effects on sensitive receptors.

As previously described, the air quality analysis presented in Section 3.2, *Air Quality* presents the results of the CalEEMod and construction HRA prepared for the proposed Project by the air quality

experts at iLanco. The CalEEMod results and the conclusion of the construction HRA are the results of carefully made assumptions reading schedule, duration, construction equipment, and application of air emissions control measures as well as robust air quality modeling. The air quality analysis compares the results of these studies to the quantitative significance thresholds established by the SCAQMD and meets all of the requirements in the CEQA Guidelines. Beyond simple assertions that construction activities would result in health impacts related to air quality, the comments provided on this issue do not challenge the methodology, assumptions, or quantitative results of this extensive quantitative modeling effort.

With regard to the mitigation measures identified to reduce air quality impacts to less than significant, pursuant to CEQA Guidelines Section 15126.4, *"…where potentially significant adverse environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts must also be identified and implemented."* CEQA also requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*…until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified it Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

### 9.2.11 Master Response 11 – Hazards and Hazardous Materials Analysis

Numerous comments on the Draft Environmental Impact Report (EIR) raised issues related to the Phase I and Phase II Environmental Site Assessments (ESAs), potential hazardous building materials, existing soil contaminants within the Beach Cities Health District (BCHD) campus as well as the potential sources off-site source of contaminants within the surrounding vicinity of the campus. Many of these comments address the potential for disturbance and dispersion of

hazardous building materials during demolition of the existing buildings on the campus as well as the adequacy and interpretation of the soil boring samples. Several comments assert that tetrachloroethylene (PCE) from a former dry cleaner located within the Redondo Village Shopping Center as well as purported contamination associated with the previously abandoned and plugged oil well on the vacant Flagler Lot could result in effects on adjacent residents and school children.

However, Federal and state standards for containment and management of hazardous materials during demolition of older buildings and excavation of potentially contaminated soils are clear and rigorous. Many or most urban infill redevelopment projects encounter similar issues when older structures are demolished or subsurface soil or groundwater contamination are encountered and hundreds of projects in the Los Angeles Basin have successfully addressed similar issue while avoiding hard to the health and welfare of surrounding neighborhoods. Standards for containment, removal, remediation and transport of potentially hazardous materials such as asbestos and PCEs are clearly set forth in both state and federal regulations and the proposed Project would be required to adhere to all applicable Federal, State, and local regulations.

The EIR provides an exhaustive analysis of the environmental impacts associated with hazards and hazardous materials that could result from construction and operation of the proposed Project in Section 3.8, *Hazards and Hazardous Materials.* The term hazardous materials is used in this section to refer to chemicals such as petroleum products, solvents, agricultural pesticides, herbicides, paints, metals, asbestos-containing material (ACM), lead-based paint (LBP), and other regulated materials (e.g., polychlorinated biphenyls [PCBs]). A range of other types of hazards are addressed in other sections of this EIR, including: hazardous air pollutants (e.g., toxic air contaminants [TACs] and diesel particulate matter [DPM]) addressed in Section 3.2, *Air Quality*; geologic hazards (e.g., earthquakes, soil stability, etc.) addressed in Section 3.6, *Geology and Soils*; polluted stormwater runoff is discussed in Section 3.9, *Hydrology and Water Quality*; urban fire protection services and response/suppression systems discussed in Section 3.13, *Public Services*; and transportation-related hazards (e.g., pedestrian and bicycle safety) discussed in Section 3.14, *Transportation*.

The hazards and hazardous materials analysis is based on the Phase I and Phase II ESAs prepared by Converse Consultants, a firm with decades of experience preparing environmental due diligence studies for development projects across California. The analysis also considers the compliance with all applicable Federal and State regulations, including requirements for containment to protect adjacent land uses.

Phase I ESAs consist of a site inspection, interviews, and database searches to identify the potential for Recognized Environmental Conditions (RECs) (i.e., potential sources of environmental

contamination) associated with the underlying land as well as the physical improvements to the property. If the Phase I ESA determines that there are RECs, then a Phase II ESA may be conducted. Phase II ESAs include targeted sampling, investigation, and analysis of the potential soil and/or groundwater contamination identified in the Phase I ESA. Based on the findings of the Phase I ESA for the Project site, which identified potential sources of contamination, including a previously abandoned and plugged oil and gas well located on the Flagler Lot as well as a former dry cleaner located within the Redondo Village Shopping Center, Wood Environment & Infrastructure Solutions, Inc. (Wood) recommended that Converse Consultants prepare a Phase II ESA.

The Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants, consistent with industry standards as well as all applicable Federal and state regulations. Soil samples were analyzed for volatile organic compounds (VOCs), Total Petroleum Hydrocarbons (TPH), Title 22 metals, organochlorine pesticides (OPPs), and semi-volatile organic compounds (SVOCs) in accordance with methods described by the U.S. Environmental Protection Agency (USEPA). Soil vapor probes were screened from methane, static pressure, and concentrations of oxygen and carbon dioxide. The purpose of completing soil borings was to identify the absence or presence of contaminated soil and/or soil vapor on the Project site. Three of the screened contaminants were detected in excess of their residential screening levels: PCE, benzene, and chloroform, all of which are classed as VOCs. This identification of contaminants was then used to inform precautionary or remedial activities necessary during construction. No further soil boring sampling, which was requested by some commenters, is necessary because the presence of contaminants has already been identified. (In such a case, standard regulatory actions including containment and protection of adjacent uses will be required as a matter of law.) CEQA Guidelines Section 15204 clearly states: *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."*

Ground disturbing activities (e.g., excavation, trenching, and grading) during Phase 1 and Phase 2 would disturb PCE-contaminated soils, beginning with the excavation for the subterranean levels of the Residential Care for the Elderly (RCFE) Building to a depth of 26 feet during Phase 1. Similarly, grading within the vacant Flagler Lot would also affect PCE-contaminated soils. During Phase 2 excavation for the subterranean levels of the proposed parking structure, service areas, and other trenching and grading activities during Phase 2 would encounter PCE-contaminated soils. Disturbance of benzene-contaminated soil could occur during Phase 1 with the removal of the existing northern surface parking lot and subsequent excavation and construction activities associated with the proposed RCFE Building. Disturbance of chloroform concentrations could

occur during Phase 2 as a result of demolition of the existing parking structure and potentially the Beach Cities Advanced Imaging Building as well as subsequent excavations, grading, and construction activities. Implementation of mitigation measures Mitigation Measure (MM) HAZ-2a through HAZ-2d would ensure VOC compounds and contaminated soils are detected and properly managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies.

As described in Section 3.8.1, *Environmental Setting*, the Beach Cities Health District (BCHD) has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the Certified Unified Program Agency (CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup. Although previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the BCHD campus have not experienced vapor intrusion form subsurface contamination, development would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatized PCE through carbon filters before outgassing the vapor at a controlled rate. Because PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

Construction activities during each phase of development would require transportation, use, storage, and disposal of small quantities of commercially available hazardous materials, including vehicle fuels, oils, transmission fluids, and hydraulic fuels. However, the use of such materials would be in limited quantities (i.e., not commercially reportable) and would be handled in compliance with Federal, State, and local regulations pertaining to their transport, use, or disposal (e.g., Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan as well as the applicable hazardous materials programs administered by LACoFD described in Section 3.8.2, *Regulatory Setting*. As such, the potential for hazardous materials release associated with the transport, use, or disposal would be limited to the accidental spill of chemicals, petroleum, oils, and lubricants within the on-site construction staging areas or along the proposed haul routes. As described in Section 2.5.1.6, *Construction Activities*, the development application(s) for the proposed Project would include a comprehensive Construction Management Plan, to be submitted for review and approval by the Redondo Beach and Torrance Building & Safety Divisions prior to the issuance of demolition, grading, or building permits. In addition to further defining the construction staging locations within the Construction Management Plan would also provide a detailed description of requirements for storage of hazardous materials, construction fueling areas, and spill kits and secondary containment consistent with all applicable Federal, State, and local regulations. The transport of large quantities of hazardous materials to the Project site, if any, would be subject to applicable Federal, State, and local regulations intended to reduce the risk of accidental spills, leaks, fire, or other hazardous conditions. The U.S. Department of Transportation (DOT), Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as enforced by the California Highway Patrol (CHP) and California Department of Transportation (Caltrans) described in Section 3.8.2, *Regulatory Setting*. Compliance with applicable regulations as well as oversight by the appropriate Federal, State, and local agencies would minimize the risk of hazardous materials exposure during transport. Therefore, the proposed Project would result in a less than significant impact regarding the transport of hazardous materials. All hazardous materials used operationally on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. The proposed Project would be subject to all of the requirements set forth in Chapter 4 (Small Quantity Generator Requirements) of the Health and Safety Code (H&SC) Medical Waste Management Act. Adherence to medical waste regulations for small quantity generators would ensure that impacts related to the storage, transport, and disposal of medical waste would be less than significant.

As described in Section 3.8.1, *Environmental Setting*, based on the age of existing structures, building materials may contain ACM, LBP, PCBs. Improper attempts to remove ACM can release

asbestos fibers into the air. However, as required by MM HAZ-1, surveys for ACM, LBP, and PCBs would be conducted by a licensed contractor(s) prior to and during the demolition activities. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and mold to ensure public safety, such as sealing off an area sealing off an area with plastic and filtering the affected air to ensure that no asbestos fibers are let out into the surrounding environment. Therefore, implementation of mitigation measure MM HAZ-1 and compliance with existing mandatory regulations and abatement procedures for the treatment, handling, and disposal of ACM, LBP, PCBs and mold, would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools.

The Phase I ESA identified several potential environmental conditions adjacent to the Project site including the former landfill at 200 Flagler Lane as a potential source of contamination. However, as described in Section 3.8, *Hazards and Hazardous Materials* the former landfill at 200 Flagler Lane underwent cleanup after its closure and a completed-case closed designation was issued by the Los Angeles RWQCB. The Phase 1 ESA did not identify the former landfill as a potential REC; therefore, the landfill requires no further analysis.

The Phase I ESA identified several potential environmental conditions at the Project site including a previously plugged and abandoned oil and gas well on the vacant Flagler Lot. As described in Section 3.8.1, *Existing Environmental Setting*, Converse Consultants was unable to confirm the precise location of the well. In September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially

dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

The Phase I ESA also identified the historic use of a small pond for agriculture purposes and historical use of a second pond on the vacant Flagler Lot. Despite review of available historical records, the purpose and use of the second pond is unknown. However, the Phase I ESA did not identify these historic ponds as a REC. Further, as described above, soil borings were completed to identify the presence of potential hazardous contaminants across the Project site. No contaminants aside from the three VOCs described above were found. Therefore, the historic pond does not require further analysis. Issues related to geologic stability are discussed in Section 3.6, *Geology and Soils.*

### 9.2.12 Master Response 12 – Noise Analysis

Numerous comments on the Draft Environmental Impact Report (EIR) raised issues related to the temporary, but prolonged construction-related noise as well as operational noise. Many of the comments simply stated the commenter's opinion that the EIR understates the noise impacts to the surrounding sensitive receptors. Many also asserted, without substantiating evidence or expert opinion, that the proposed Project would result in impacts to school children at Towers Elementary School. Finally, other comments challenged the use of the Federal Transit Authority (FTA) thresholds in the EIR, instead asserting that metrics such as $L_{max}$ should have been considered.

The EIR includes an extensive assessment of construction-related noise impacts and operational noise impacts associated with the construction and operation of the Phase 1 site development plan and Phase 2 development program. As discussed therein, information for the section was developed based on review of current noise and vibration standards and assessment methodologies, which include use of the Federal Highway Administration (FHWA) Traffic Noise Model, FHWA Roadway Construction Model, and the Federal Transit Administration's (FTA's) *Transit Noise and Impact Assessment Manual* (FTA 2018). Included in the analysis of noise impacts is a detailed assessment of construction-related noise and vibration from heavy construction equipment and construction vehicle; operational noise resulting from occupancy of the proposed facilities, including noise generated from outdoor function areas and outdoor events; and traffic and roadway noise and vibration. Where potentially significant impacts have been identified (i.e., construction-related noise) detailed mitigation measures have been development to reduce noise levels to the maximum extent feasible.

Occupational exposure to noise is controlled at the Federal level by Occupational Safety and Health Administration (OSHA) and at the State level by the California Division of Safety and

Health. Pursuant to Federal and State regulations, he maximum allowable noise exposure over an eight-hour period is a level of 90 dBA. For each halving of the exposure time, the maximum noise level is allowed to increase 5 dBA. Therefore, the maximum allowable noise exposure (100 percent) is 90 dBA for 8 hours, 95 dBA for 4 hours, 100 dBA for 2 hours, 105 dBA for 1 hour, 110 dBA for 30 minutes, and 115 dBA for 15 minutes. Nevertheless, for the purposes of this EIR, construction noise impacts would occur if expected noise levels exceed the FTA's residential criteria (8-hour $L_{eq}$ of 80 dBA and 30-day average $L_{dn}$ of 75 dBA) and operational noise impacts would occur if expected noise levels allowable noise standards of the Redondo Beach Municipal Code (RBMC) (nighttime interior noise limit of 40 dBA and daytime interior noise limit of 45 dBA) and the Torrance Municipal Code (TMC) (nighttime interior noise limit of 50 dBA and daytime interior noise limit of 55 dBA). The criteria and standards of the FTA, RBMC, and TMC are established to limit or prevent adverse noise impacts on human health and are set at limits below those established by OSHA and the California Division of Safety and Health.

The EIR includes adequate discussion of the potential impacts and mitigation of construction-related noise and vibration both on- and off-site under Impact NOI-1 and Impact NOI-2 in Section 3.11.5, *Project Impacts and Mitigation Measures.* This analysis includes detailed estimates of Project construction noise levels and their impact on various sensitive receptors. The full list of noise-sensitive land uses considered in the analysis of noise impacts is presented in Table 3.11-16 and includes residences near the Project site, Towers Elementary School, and on-site facilities. As presented therein, the proposed construction activities during both Phase 1 and Phase 2 would have significant impacts to noise-sensitive receptors for the duration of the construction phases, because the projected $L_{eq}$ would exceed the FTA's residential criteria. To reduce the impacts of excessive construction noise on surrounding land uses, Mitigation Measure (MM) NOI-1 is identified. This measure would require the implementation of a Construction Noise Management Plan that requires:

- Limitations on the hours of construction activities;
- Installation of noise barriers;
- Implementation of noise best management practices and active noise suppression features, such as muffling of equipment, use of electric power tools, and staging of equipment away from on-site and off-site sensitive uses;
- Use of designated haul routes;
- Distribution of notices prior to initiation of construction activities; and

- Frequent monitoring of noise and vibration resulting from construction to ensure implementation of all noise attenuation measures.

As discussed under Impact NOI-1 implementation of this mitigation measures, as well as required compliance with the Redondo Beach and Torrance Noise Regulations (RBMC Sections 4-24.5-3 and 9-1.12 and TMC Section 6-46.31) would reduce construction noise impacts; however, feasible noise barrier heights and locations would not reduce noise levels below the FTA's residential criterion and impacts are considered significant and unavoidable. Nevertheless, expected noise levels would not exceed the 8-hour 90-dBA limit identified by OSHA and the California Division of Safety and Health for defining when impacts on human health would occur. Impacts from generation of ground-borne vibration on noise-sensitive receptors located along Beryl Street, Del Amo Boulevard, North Prospect Avenue, and 190$^{th}$ Street would be less than significant according to FTA and based on approved methodologies for analysis of noise vibration and ground-borne vibration. Nevertheless, MM NOI-2 is proposed to further reduce less than significant impacts from haul trucks during construction.

The noise analysis presented in the EIR also includes detailed discussion and analysis of impacts associated with operation of the proposed Project. Despite commenters assertions, this analysis does in fact include consideration of noise generated at the Project site (e.g., heating, ventilation, and air conditioning [HVAC] equipment, delivery and service trucks, parking operations, outdoor functions), increases in roadway noise as a result of increased traffic, and emergency vehicle noises which would be perceived by nearby noise-sensitive land uses. For instance, the analysis considers the potential increase in total number of individuals requiring ambulance services and the associated number of ambulance calls associated with this number based on average annual calls per bed space per year. While it is noted that these responses would be sporadic and not always require the use of sirens, the analysis includes discussion of the typical noise impacts that increased medical response would generate when sirens are utilized (approximately 100 dBA at 100 feet, and between 91 and 100 dBA at receptors along North Prospect Avenue and Beryl Street). In such a case, associated noise impacts are not considered significant given the infrequent and short duration of siren utilization (duration of exposure to peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic).

While the analysis does not explicitly identify noise impacts from the proposed Southern California Edison (SCE) Substation, medium voltage distribution system, and generator yard, noise impacts of these improvements are considered to be negligible. According to the National Electrical Manufacturers Association (2014) and Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50

feet, which is well below the ambient $L_{dn}$ noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed substation would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment. Nevertheless, additional discussion regarding operational noise impacts of the proposed substation has been included in discussion of in Section 3.11, *Noise* under Impact NOI-3.

With regard to analysis of impacts based on $L_{eq}$ versus $L_{max}$ metrics, the threshold for identifying significance of noise impacts based on Appendix G of the CEQA Guidelines state that a significant impact may occur *"if the project would result in: (a) generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies…"* Within the City of Redondo Beach and the City of Torrance, the local general plan and noise ordinance do not establish quantitative noise limits or other standards for construction, nor do they establish standards or thresholds for evaluating the environmental impacts of construction noise. Recent EIRs prepared by the City of Redondo Beach have relied on the *City of Los Angeles CEQA Guidelines (2006)* significance threshold for construction noise, while recent EIRs prepared by the City of Torrance have applied thresholds based in part upon Table N-2 of the General Plan Noise Element. However, these thresholds differ and, given the location of the Project site within Redondo Beach and partially within City of Torrance right-of-way, BCHD has elected to identify a standardized threshold that is applicable across all local jurisdictions. In the absence of local standards established in a general plan or noise ordinance, the analysis of Project noise impacts in this EIR is instead based upon the Detailed Analysis Noise Criteria presented in the FTA's *Transit Noise and Vibration Impact Assessment Manual*. Within these guidelines, the FTA states that an 8-hour $L_{eq}$ of 80 dBA and a 30-day average of 75 $L_{dn}$ is a reasonable criterion for assessment of construction activities on residential land use. For these reasons, the analysis of noise impacts from construction is based upon the $L_{eq}$ metric and not the $L_{max}$ metric. The $L_{eq}$ unit of measurement is appropriate because $L_{eq}$ can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,
- Average noise over all phases of the construction.

While the analysis of noise impacts based upon the $L_{max}$ unit of measurement may be applicable to some jurisdictions based upon their adopted general plan or noise ordinance standards and

thresholds, such thresholds and standards have not been adopted or implemented by the City of Redondo Beach and the City of Torrance in their analysis of construction-related noise impacts. Further, the direct use of the $L_{max}$ unit of measurement is not supported by the FHWA's Roadway Construction Noise Model or FTA's *Noise and Vibration Impact Assessment Manual*. Specifically, the FTA's Noise and Vibration Impact Assessment Manual (2018) states that:

> *"[a]lthough $L_{max}$ is commonly used in vehicle-noise specifications, it is not used for transit environmental noise impact assessment. $L_{max}$ does not include the number and duration of transit events, which are important for assessing people's reactions to noise. It also cannot be normalized to a one-hour or 24-hour cumulative measure of impact, and therefore, is not conducive to comparison among different transportation modes."*

### 9.2.13 Master Response 13 – Transportation Analysis

Several comments have asserted that the impacts to transportation are downplayed in the Environmental Impact Report (EIR). Comments regarding construction-related traffic have asserted that construction activities would result in significant impacts related to pedestrian safety and could affect adjacent single-family residential neighborhoods through off-street construction parking. With regard to operational traffic, numerous comments asserted that trips generated by employees, residents, and family of the proposed Assisted Living units and Memory Care units would contribute to existing congestion and that cut-through traffic would be likely to exacerbate impacts to residential streets. However, the EIR thoroughly assesses the impacts associated with vehicle trips, mobility, and transportation safety from construction and operation of the proposed Project in Section 3.14, *Transportation*.

*Duration and Timing of Construction-Related Traffic*

As described in Section 3.14, *Transportation* the majority of construction-related truck trips would occur during excavation and soil export activities for Phase 1 of the proposed Project. Construction-related traffic would be temporary in nature. Further, implementation of Mitigation Measure (MM) T-2 would reduce this impact by requiring the preparation of a Construction Traffic and Access Management Plan, which would include measures to reduce construction traffic and maintain public safety. For example, MM T-2 would require work within the public right-of-way, including soil and demolition material hauling and construction material delivery, to occur between 9:00 a.m. and 4:00 p.m. to avoid conflicts with morning (AM) and evening (PM) peak hour traffic periods. As described in MM T-2, work within the public right-of-way outside of these hours shall only be allowed contingent upon the issuance of an after-hours construction permit

from the Redondo Beach and/or the Torrance Community Development Departments, depending on where such work occurs.

*Impacts to Vehicle, Bicycle, and Pedestrian Mobility and Safety*

The EIR analyzes in detail potential impacts to vehicle and pedestrian mobility and safety during construction activities associated with the proposed Project are discussed in Section 3.14.4, *Project Impacts and Mitigation Measures* under Impact T-3. As discussed therein, increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and potentially slow traffic movement. In addition, frequent haul truck traffic entering and exiting the driveways along North Prospect Avenue and Beryl Street could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, through temporary closure of bicycle lanes or sidewalks. Other potential construction-related impacts include idling, parked, or queued haul trucks that could potentially obstruct visibility. As a result, construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity are identified in this EIR as potentially significant impacts. To avoid construction-related safety hazards, the preparation and implementation of a Construction Traffic and Access Management Plan required under MM T-2 would address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible.

*Revised Construction Haul Routes*

Implementation of MM T-2 also requires that the Beach Cities Health District (BCHD) obtain approval from the City of Redondo Beach and the City of Torrance of any haul routes for earth, concrete, or construction materials and equipment hauling where such route cross the jurisdictional boundaries. Due to requests from the City of Torrance and the Torrance Unified School District

(TUSD) in their public comments for revisions to the construction haul routes proposed in the Draft EIR, the following construction haul routes have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to schools:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from the vacant Flagler Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards Interstate (I-) 405.
- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesiea Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.
- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

These proposed inbound and outbound construction haul routes for the proposed Project have been revised in the Final EIR in response to these requests from the City of Torrance and TUSD.

TUSD also requested during the public comment period MM NOI-1 (Construction Noise Management Plan) to be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School, in order to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts. This request will require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1st grade and 5th grade), and are not the same at the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

*Operational Cut-Through Traffic*

The EIR and supporting Vehicle Miles Traveled Study (see Appendix M) provide a detailed assessment of potential changes in cut-through traffic. Existing cut-through traffic between Beryl Street and Del Amo Boulevard in the City of Torrance is discussed in Section 3.14.1,

*Environmental Setting*. As shown in Table 3.14-3, cut-through traffic is more frequent during the AM peak period, with up to 47 percent of the vehicle traveling between Beryl Street and Del Amo Boulevard contributing to cut-through traffic. As described under Impact T-3, cut-through traffic could present a safety hazard associated with speeding through residential neighborhoods and the increased risk of collisions. Cut-through traffic is a major concern for the residents and was identified as an area of public concern within the agency and public comment letters received on the Notice of Preparation (NOP) for this EIR (refer to Section 1.8, *Areas of Known Public Controversy*).

Based on the detailed analysis of existing conditions – including various traffic counts along roadway segments in the neighborhood – the EIR the performed an analysis on how the proposed Project could affect cut-through traffic. As previously described, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by turning right off of Flagler Lane and exit turning left turn onto northbound Flagler Lane. Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to parking on the BCHD campus and as such, would not be a primary entrance. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood.

Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing trip generation at the campus. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the campus (when most cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods, with no measurable increase in cut-through traffic forecasted by the study. Therefore, the proposed Project would not contribute to operational safety hazards related to peak period cut-through traffic, and impacts would be less than significant.

*Operational Vehicle Trips*

As described in Section 3.14, *Transportation*, the Vehicle Miles Traveled Study (see Appendix K) prepared for the proposed Project by Fehr & Peers determined that 3,284 of the total existing daily

vehicle trips are generated from land uses within the Beach Cities Health Center. Phase 1 of the proposed Project would demolish the Beach Cities Health Center and subsequently remove these 3,284 daily vehicle trips from the roadway network. (The remaining 3,429 existing daily trips are generated by the medical office uses at 510 North Prospect Avenue and 520 North Prospect Avenue, which would remain in operation under Phase 1 of the proposed Project.)

During operation of the Phase 1 preliminary site development plan, the proposed uses within the Residential Care for the Elderly (RCFE) Building that would replace the Beach Cities Health Center are expected to generate 1,365 daily vehicle trips, including 73 AM peak period trips and 64 PM peak period trips (refer to Table 3.14-6). The net trip generation, which is calculated by subtracting the existing trips generated by the Beach Cities Health Center from the estimated trips that would be generated by the proposed RCFE Building, is expected to be negative. This means that more vehicle trips would be removed from the roadway network than the number of trips that would be added to the roadway network from operation of the proposed RCFE Building. Implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). This is in part because Phase 1 of the proposed Project would replace high trip generating land uses (e.g., medical office) with lower trip generating land uses (e.g., Assisted Living units). This reduction in daily vehicle trips as a result of Phase 1 is also attributed to the demolition of most of the existing uses within the Beach Cities Health Center and the construction of only a small portion of the proposed Healthy Living Campus Master Plan.

After completion of Phase 2, however, the proposed Project is expected to generate a total of 3,360 daily vehicle trips, including 271 AM peak period trips and 195 PM peak period trips (refer to Table 3.14-7). After accounting for existing trips being removed from the roadway network, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate a net increase of 376 new daily trips as compared with existing conditions.

As described under Impact T-2, implementation of MM T-1 would require BCHD to prepare and implement a comprehensive Transportation Demand Management (TDM) plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors. The TDM plan would be developed prior to the issuance of a Conditional Use Permit (CUP) for Phase 1 of the proposed Project and would be continuously maintained and adjusted, as needed. Implementation of the TDM Plan would require annual surveys to capture trip origin data, travel mode, rideshare (e.g., number of people in the party), and other key data and indicators for TDM program performance related to vehicle miles traveled (VMT) (e.g., employee incentives for

bicycling to work). Annual monitoring reports would include trip length surveys for BCHD employees and tenants of the campus. Survey results would be used to determine the appropriate TDM measures to employ in the coming year to maximize reductions in VMT per capita, promote transit and alternative mode transportation to the BCHD employees, develop appropriate incentives to increase the BCHD's transit mode share incrementally over time, and develop effective marketing tools to advertise transit and non-vehicular travel mode availability and incentives. A range of TDM measures would be considered to reduce employee and visitor VMT per capita, such as providing employee incentives to participate in a vanpool program and regularly advertise the opportunities to vanpool through a variety of employee communication formats, a transportation information center and wayfinding signage for nearby Beach Cities Transit Line 102 bus stops, and on-site bicycle amenities for employees and visitors. Therefore, implementation of MM T-1 would reduce operational vehicle trips associated with the proposed Project.

### 9.2.14 Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard

*Placement of Substation*

Under the proposed Project, the existing Maintenance Building and connected substation would be demolished and redeveloped with open space and pedestrian walkways. A new electric service would be developed in conjunction with Southern California Edison (SCE) – including the development of a new on-site distribution system. The proposed design for the electrical distribution system includes a SCE Substation, medium voltage distribution system, and generator yard, which would be located along the southern end of the Project site.

Potential locations for the proposed substation are limited to areas where: the substation could be installed early in the project timeline (i.e., outside of active construction zones); the substation would be readily accessible by truck for SCE service and maintenance activities during all phases of project construction and operation; and existing utility connections are present. As such, location of the proposed substation, generator yard, and gas valve enclosure is limited to the southeastern hillside of the Project site. The proposed substation would be constructed at the toe of the slope adjacent to Flagler Alley, surrounded by a perimeter wall, and screened by proposed landscaping.

*Electricity and Health*

Electricity powerlines, substations, transformers and other electrical sources such as common electrical appliances and wiring, all emit extremely low frequency (ELF) electric and magnetic fields (EMF). For substations and transformers, the magnetic fields at distances of 5 to 10 meters

(approximately 16 to 33 feet) away are generally indistinguishable from typical background levels in the home. As we are surrounded by electrical sources in our daily lives we are all exposed to some level of ELF EMF constantly. Since the late 1970s, questions have been raised whether exposure to these ELF EMF produces adverse health consequences. Most of the research indicates that ELF EMF exposure normally encountered in the environment, including in the vicinity of powerlines, does not pose a risk to human health.

Based largely on this limited evidence the International Agency for Research on Cancer has classified ELF magnetic fields as possibly carcinogenic to humans. However, there is no established evidence that the exposure to magnetic fields from powerlines, substations, transformers or other electrical sources, regardless of the proximity, causes any health effects. In October 2005, the World Health Organization (WHO) convened a Task Group of scientific experts to assess any risks to health that might exist from exposure to ELF electric and magnetic fields in the frequency range >0 to 100,000 Hertz (Hz) (100 kilohertz [kHz]). Following a standard health risk assessment (HRA) process, the Task Group concluded that there are no substantive health issues related to ELF electric fields at levels generally encountered by members of the public. Much of the scientific research examining long-term risks from ELF magnetic field exposure has focused on childhood leukemia associated with average exposure to residential power-frequency magnetic field above 0.3 to 0.4 microteslas (μT). However, there is limited evidence of carcinogenicity in humans and less sufficient evidence for carcinogenicity in experimental animals. Evidence is weakened by methodological problems, such as potential selection bias. In addition, there are no accepted biophysical mechanisms that would suggest that low-level exposures are involved in cancer development. Evidence related to childhood leukemia is not strong enough to be considered causal.

A number of other adverse health effects have been studied for possible association with ELF magnetic field exposure. These include other childhood cancers, cancers in adults, depression, suicide, cardiovascular disorders, reproductive dysfunction, developmental disorders, immunological modifications, neurobehavioural effects and neurodegenerative disease. The WHO Task Group concluded that scientific evidence supporting an association between ELF magnetic field exposure and all of these health effects is much weaker than for childhood leukemia. In some instances (i.e., for cardiovascular disease or breast cancer) the evidence suggests that these fields do not cause them. In conclusion, the scientific evidence does not establish that exposure to ELF EMF found around the home, the office or near powerlines and other electrical sources is a hazard to human health.

*Electricity and Electronic Medical Implants*

To protect carriers of electronic medical implants, several safeguards are built into the devices to shield them from normal daily interference. Manufacturers often design medical implants to operate normally during an exposure to electromagnetic fields commonly encountered in residential, commercial or medical environments. The International Organization for Standardization recommend pacemakers and ICDs give resistance up to 5.4 kilovolts per meter (kV/m) (for 60 Hz electric fields). Given that the proposed 4.12 kV substation would be enclosed and setback from publicly accessible areas both on and off-site, operation of the new electrical distribution system at the Project site would not interfere with electronic medical implants.

### 9.2.15 Master Response 15 – Purpose of Public Review

Wood Environment & Infrastructure Solutions, Inc. (Wood) has decades of experience the preparation of environmental documentation compliant with the California Environmental Quality Act (CEQA) including over 60 Environmental Impact Reports (EIR) for jurisdictions across Southern California and Central California.

As provided in Section 15200 of CEQA Guidelines, the purpose of review of EIRs include: the sharing of expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals. CEQA Guidelines Section 15204 defines the suggested focus of the review:

> *"In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."*

The EIR alone stands along as the public record for compliance with CEQA. As such, the public review period is intended to provide opportunity for interested parties to comment on the technical

sufficiency of the EIR analysis, not to disparage the EIR preparers, proponent, lead agency, responsible agencies, or any of the other commentors on the EIR. For that reason, response to public comments and informational requests that are not directly related to the contents of the EIR or exceed what can be reasonably provided will not warrant further discussion in this response to comments.

### 9.2.16 Master Response 16 – Environmental Justice

Socioeconomic and environmental justice impacts in and of themselves are not physical environmental impacts, which are the focus of the California Environmental Quality Act (CEQA). CEQA requires an Environmental Impact Report (EIR) to *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines 15126.2[a] and Public Resources Code Section 21000[a]). CEQA Guidelines Section 15382 defines "*significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment*."

Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]) may have on a community in Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, 3.7 *Greenhouse Gas Emissions and Climate Change*, 3.9 *Hydrology and Water Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.10*, Land Use and Planning*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. The EIR also analyzes for effects on community services and population and housing, including Section 3.5, *Energy*; Section 3.12, *Population and Housing*, Section 3.13, *Public Services*, Section 3.15, *Utilities and Service Systems*, and Section 4.0, *Other CEQA Considerations*.

Similarly, the CEQA Guidelines do not explicitly require consideration of environmental justice, which relates to whether a project would result in disproportionate, adverse impacts on a low-income, minority, or otherwise disadvantaged populations. Nevertheless, given the claims of some commenters that the proposed Project would result in adverse impacts on Environmental Justice communities, this issue was explored in further detail.

The California Environmental Protection Agency's (CalEPA's) Office of Environmental Health Hazard Assessment (OEHHA) developed the California Communities Environmental Health Screening Tool (CalEnviroScreen), which provides State-wide data that can be used to identify communities disproportionately impacted by, or vulnerable to, environmental pollution and contaminants. Disadvantaged communities are defined as the top 25 percent of scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations. This ranking is based on specific categories such as pollutant exposure, environmental effects, sensitive

populations, and socioeconomic factors. According to California OEHHA CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. While not specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

## 9.3 INDIVIDUAL COMMENT RESPONSES

### 9.3.1 Public Agency Responses

**Letter EG**

June 10, 2021
Emily Gibson, Associate Transportation Planner / Frances Duong, Branch Chief
Caltrans District 7, Local Development – Intergovernmental Review
100 S. Main Street
Los Angeles, CA 90012

*Comment EG-1*

The comment expresses appreciation for the opportunity to review the Environmental Impact Report (EIR) prepared for the proposed Project, provides a summary of the proposed Project components, and discusses the replacement of the Level of Service (LOS) metric with the Vehicle Miles Traveled (VMT) metric pursuant to Senate Bill (SB) 743. As described in Section 3.14, *Transportation*, changes in State law now require an analysis of VMT by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing LOS by measuring intersection congestion and roadway capacity. Consistent with the intent of SB 743 and the associated updates to the CEQA Guidelines, the Vehicle Miles Traveled (VMT) Study prepared by Fehr & Peers (see Appendix K) provides a discussion of VMT associated with the proposed Project.

*Comment EG-2*

The comment expresses support for the complete streets elements of the proposed Project (e.g., tree-lined pedestrian promenade and bicycle facilities), which the comment states would reduce VMT and greenhouse (GHG) emissions and align with the mission of the California Department of Transportation (Caltrans) to provide a safe and reliable transportation network that serves all people and respects the environment. Although these comments do not address the adequacy of the EIR, they have been received, incorporated into the Final EIR as a part of the responses to

comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment EG-3*

The comment expresses support for the recommended Mitigation Measure (MM) T-1, which would require the Beach Cities Health District (BCHD) to prepare and implement a comprehensive Transportation Demand Management (TDM) plan in accordance with Redondo Beach Municipal Code (RBMC) Section 10-2.2406. The comment suggests creating a specific VMT reduction goal for the plan to better evaluate its success and revise it if needed. The comment also recommends ensuring that no more parking than required by the local permitting agency is provided to further reduce VMT.

BCHD acknowledges Caltrans' recommendation for requiring aggressive VMT reduction targets. However, it should be moted that MM T-1 is recommended to assist in implementing the TDM plan required for the proposed Project by RBMC Section 10-2.2406. The alternative transportation and active transportation (e.g., walking, biking, etc.) strategies provided in MM T-1, which would further reduce VMT associated with the proposed Project, would already be more aggressive that those required by RBMC Section 10-2.2406. The BCHD TDM Coordinator would monitor employee, tenant, and visitor mode share with annual surveys and develop annual reports for submittal to the BCHD Board of Directors. The TDM Coordinator would evaluate the effectiveness of the TDM measures being implemented at the campus and recommend adjustments as needed to the TDM plan on an annual basis. Therefore, while further additional VMT reduction targets are not required pursuant to CEQA, BCHD is committed to aggressive implementation, monitoring, and adaptive management of the TDM plan.

With regard to parking, it should be noted that BCHD carefully determined the appropriate number of parking spaces for the development proposed in Phase 1 and Phase 2 based on a shared parking study prepared by Fehr & Peers. The shared parking study was instrumental is ensuring that there would be adequate parking supply on-site in order to avoid spill over into the surrounding residential community. However, the shared parking study, which carefully considered each of the proposed uses and the timing and frequency of trips associated with sure uses, was also used to ensure that the Project site would not be overparked. As described in Section 1.5, *Required Approvals*, BCHD would pursue approval from the Redondo Beach Building & Safety Division for shared parking pursuant to RBMC Section 10-1.1706.

*Comment EG-4*

The comment suggests using more recent data from the 2020 Caltrans Fact Booklet. Section 3.5, *Energy* has been updated to reference the 2020 Caltrans Fact Booklet. However, in Section 3.14, *Transportation*, the data from the 2017 is used for a consistent comparison of State-wide VMT and VMT in the City of Redondo Beach and the City of Torrance, for which 2017 is the most recent data available. The text has been revised in the Final EIR to clarify that 2017 is the most recent data available for regional and local VMT, rather than for State-wide VMT.

*Comment EG-5*

The comment suggests replacing 2001 Caltrans data and references to the 2006 Caltrans Highway Design Manual with data from the 2020 Caltrans Highway Design Manual. Section 3.6, *Energy*, Section 3.14, *Transportation*, and Section 7.0, *References* have been updated with reference to the 2020 Caltrans Highway Design Manual.

*Comment EG-6*

The comment recommends ensuring that the most recent Federal and State laws applicable to hazardous waste materials are listed in the EIR and refers to the Laws, Regulations, and Guidance section of Caltrans' webpage. This webpage has been reviewed to confirm the most recent Federal and State laws applicable to hazardous waste materials are listed in Section 3.8.1, *Regulatory Setting*.

*Comment EG-7*

The comment requests that all references to the Caltrans 2013 Transportation and Construction Vibration Guidance Manual in Section 3.11, *Nosie* be updated to the April 2020 version of the manual. Section 3.11, *Noise* and Section 7.0, *References* have been updated to reference the 2020 Transportation and Construction Vibration Guidance Manual.

*Comment EG-8*

The comment requests that all references to the 1998 Technical Noise Supplement, Traffic Noise Analysis Protocol be updated to either the 2013 Caltrans Technical Noise Supplemental to the Traffic Noise Analysis Protocol or the April 2020 Caltrans Traffic Noise Protocol. References to the 1998 Technical Noise Supplement, Traffic Noise Analysis Protocol in Section 3.11, *Noise* and Section 7.0, *References* have been updated to the 2013 Caltrans Technical Noise Supplemental to the Traffic Noise Analysis Protocol.

*Comment EG-9*

The comment recommends including signatures on the title page and responsible agencies on the cover page. A discussion of the responsible agencies is provided in Section 1.3, *Purpose and Legal Authority*; however, signatures on the title page are not required pursuant to the CEQA Guidelines.

*Comment EG-10*

The comment states that a Caltrans transportation permit is needed for any transportation of heavy construction equipment and/or materials that requires use of oversized-transport vehicles on State highways. Section 1.5, *Required Approvals* of the EIR has been revised to include requirement of a transportation permit from Caltrans for the transportation of heavy construction equipment on State highways. The comment also recommends limiting large size truck trips to off-peak commute periods and submitting the Construction Traffic and Access Management Plan for Caltrans review if construction traffic is expected to cause issues on State Route (SR-) 1 or Interstate (I-) 405. As described under Impact T-2, construction activities associated with the proposed Project would result in additional construction-related traffic on the SR-1 and I-405 freeways. Such traffic would include heavy haul trucks, cement trucks, and material delivery trucks. MM T-2 would require work within the public right-of-way, including soil and demolition material hauling and construction material delivery, to occur between 9:00 a.m. and 4:00 p.m., thereby reducing impacts on the surrounding transportation network during the AM and PM peak hours. BCHD would obtain any required Caltrans permits, including permits required for the use of oversized-transport vehicles on state highways. MM T-2 has been revised to ensure that the Construction Traffic and Access Management Plan is submitted for Caltrans review prior to implementation.

**Letter KB**

April 29, 2021
Keith Butler
Chief Business Officer
Torrance Unified School District

*Comment KB-1*

The comment re-states the role of Torrance Unified School District (TUSD) as a reviewing agency under the California Environmental Quality Act (CEQA). Specifically, TUSD operates public K-12 schools within the City of Torrance and is responsible for the safety and well-being of students and employees on school grounds. The comment also briefly summarizes the proposed redevelopment of the existing Beach Cities Health District (BCHD) campus. As the lead agency,

BCHD recognizes this TUSD's role and ongoing participation in the CEQA process. BCHD appreciates the focused comments provided on the Draft Environmental Impact Report (EIR).

*Comment KB-2*

The comment summarizes the construction haul routes and their relationship to the nearby schools within TUSD boundaries, including Towers Elementary School, West High School, and Magruder Middle School. The comment asserts that construction activities and construction vehicles have the potential to indirectly affect TUSD schools, particularly at these three campuses. Specifically, the comment raises issues regarding noise and vibration, exposure to hazardous materials, interruptions of drop-off / pick-up, and pedestrian-vehicle conflicts. The EIR thoroughly addresses the potential for impacts related to noise and ground-borne vibration (refer to Section 3.11, *Noise*), exposure to hazardous materials (refer to Section 3.8, *Hazards and Hazardous Materials*), and transportation-related safety issues (refer to Section 3.14, *Transportation*). The EIR also considers schools as sensitive receptors in each of these impact analyses as well as the other impacts analyses for the other environmental topic areas evaluated in the EIR. Towers Elementary School and West High School are named and addressed in detail given their proximity to the Project site. Magruder Middle school is located adjacent to the inbound construction route and is also considered a sensitive receptor – along with other residences, schools, recreational land uses, medical facilities, and places of worship – though is not specifically named.

*Comment KB-3*

The comment states that the proposed haul routes do not fully comply with the truck routes that have been adopted by the City of Torrance. Specifically, the comment identifies that two segments that are not shown on the City of Torrance Established Truck Routes map:

- The segment of Beryl Street, between Flagler Lane and West 190$^{th}$ Street, adjacent to Towers Elementary School.
- The segment of Prairie Avenue, between West 190$^{th}$ Street and Artestia Boulevard, adjacent to Magruder Middle School.

The comment requests that these street segments be eliminated as proposed haul routes. In response to this request from TUSD, the proposed haul routes have been revised in the Final EIR as follows:

- The road segment of Beryl Street between Flagler Lane and West 190$^{th}$ Street would be avoided. Outbound haul trucks would instead leave the Project site from Flagler Lot by

traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards I-405.

- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesiea Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.
- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

TUSD has acknowledged in the comment that these revisions would reduce potential impacts at Towers Elementary School and eliminate potential impacts and Magruder Middle School. BCHD has incorporated these suggested revisions in the Final EIR in keeping with Mitigation Measure (MM) T-2, which requires that the proposed haul routes are "*consistent with the Redondo Beach and Torrance General Plan designations.*" Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

*Comment KB-4*

The comment requests that the proposed construction activities that generate the greatest noise and vibration impacts (i.e., building, demolition, and grading activities) occur when students are not in school. The comment suggested that these activities would be most appropriate on Saturdays or during school breaks. The comment further requests that for those activities that cannot be scheduled outside of school hours, BCHD should coordinate with the Principal of Towers Elementary to ensure that construction noise and vibration impacts do not occur on important test days.

First, it is important to note that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east, exterior noise levels and ground-borne vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Further as described in Section 3.11, *Noise* under Impact NOI-2, ground-borne vibration levels generated during construction would not affect or be noticeable to any sensitive receptors during construction. Therefore, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary

approximately 350 feet from the campus. However, the indoor learning environment is separated from the campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division and the Torrance Building & Safety Division for construction activities within their respective jurisdictional limits. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. Additionally, at least 1 month prior to the initiation of construction-related activities during Phase 1 and Phase 2, BCHD shall prepare and distribute notices to those located within a 0.25-mile radius. BCHD is committed to ongoing coordination and revisions to the construction schedule, as feasible, ahead of and during the proposed construction activities, to protect and maintain the indoor learning environment at Towers Elementary School.

*Comment KB-5*

The comment correctly describes that the proposed weekday construction schedule of 7:30 a.m. to 6:00 p.m. (which is consistent with Redondo Beach Municipal Code [RBMC] Section 4-24.503 and Torrance Municipal Code [TMC] Section 6-46.3.1) and asserts that construction-related traffic would disrupt and delay drop-off and pick-up activities at nearby TUSD campuses. The comment requests that MM NOI-1 be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190$^{th}$ Street 15 minutes before and after the school start and end bells at Towers Elementary School and West High School. Potential construction-related traffic and pedestrian-vehicle safety issues are thoroughly addressed under Impact T-3. As required by MM T-2, BCHD would be required to prepare a Construction Traffic and Access Management Plan to be approved by the City of Redondo Beach and the City of Torrance for construction activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the L.A. County – Department of Transportation Area Traffic Control Handbooks. As a requirement of the Construction Traffic and Access Management Plan BCHD shall be required to provide timely notification and coordinate construction schedules with all affected agencies and parties within a radius of 500 feet, including Towers Elementary School.

Importantly, it should be noted that the Construction Traffic and Access Management Plan limits work within the public right-of-way to the period between 9:00 a.m. and 4:00 p.m. (This work includes dirt and demolition material hauling and construction material delivery.) The request to further limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School would require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1st grade and 5th grade), and are not the same between the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1 and MM T-2, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

**Letter PF**

June 3, 2021
Patrick Furey, Mayor
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

*Comment PF-1*

The comment introduces the attached letter and associated comments from the City of Torrance Mayor, Patrick Furey. This comment has been received and incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments.

*Comment PF-2*

The comment expresses appreciation toward the Beach Cities Health District for notifying the City of Torrance that Draft EIR has been published. The comment goes on to state that the City of Torrance has prepared comments on and recommendations for the Draft EIR. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

*Comment PF-3*

The comment expresses concern for the Torrance residents living adjacent to the east of the Project site and requests consideration of additional alternatives and mitigation measure to reduce the potential impacts, such has repositioning the Residential Care for the Elderly (RCFE) Building further west, which each floor stepping back farther from Flagler Lane as building height increases and removing Project site access from Flagler Lane. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

With regard to the proposed site plan associated with the RCFE Building, it should be noted that the Beach Cities Health District (BCHD) has already revised the building footprint to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. As summarized in Master Response 9 – Aesthetics and Visual Resources Analysis, the 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

BCHD is unable to locate the building footprint further to the west due to the constraints associated with the existing BCHD campus. The building footprint must accommodate the continued operation of the Beach Cities Health Center as well as the Providence Little Company of Mary Medical Institute Building during construction. The site plan must also accommodate internal circulation roads and pathways between these buildings. Further, while BCHD is considers ways to accommodate floor to ceiling height reductions to achieve Mitigation Measure (MM) VIS-1, additional stepbacks in the RCFE Building cannot be accommodated without a substantial reduction in Assisted Living units and Memory Care units. As previously noted the number of units was already reduced by nearly 50 percent. Further reductions would not achieve the project

objectives related to revenue generation, based in part on the three market studies prepared by MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, and independently review by Cain Brothers (refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units). Additional discussion has been added to Section 5.4, *Alternatives Considered but Rejected from Further Analysis* to further describe these constraints.

As acknowledged in in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with Torrance Municipal Code (TMC) Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. BCHD also recognizes that the City of Torrance is now considering the potential removal of the southbound vehicle movement along Flagler Lane between Beryl Street and Towers Street and that this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed RCFE Building. Therefore, Alternatives 3, 4, 5, and 6 would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane (refer to Section 5.5, *Alternatives Analysis*).

*Comment PF-4*

The comment asserts that the environmental analysis of the Phase 2 development program is vague. As discussed in Section 1.1, *Overview,* the EIR evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phase 2, analyzed at a programmatic level of detail. This approach to analysis is not uncommon, and is in fact specifically called for under California Environmental Quality Act (CEQA) Guidelines Section 15165. Refer to BCHD Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to this issue. As described there in, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact*

*report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment PF-5*

The comment expresses appreciation for attention to these comments and introduces additional comments that the City of Torrance received on the Draft EIR, provided as Attachment B to Letter PF. The comments in Attachment B have been received, reviewed, and found to be duplicative with the comments that have been individually submitted to BCHD on the Draft EIR. For example, the comments provided by Torrance Redondo Against Overdevelopment are directly responded to in Letter TRAO (see Section 9.3.3, *Neighborhood Organizations*).

*Comment PF-6*

The comment notes that Table ES-2 and Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

*Comment PF-7*

The comment asserts that the description of zoning surrounding the Project site is incorrect. Section 2.2.2, *Surrounding Land Uses* of the EIR has been revised, as requested, to describe the zoning surrounding the Project site, in addition to the General Plan land use designations. However, it should be noted that the environmental impact analysis provided throughout the EIR already considers these adjacent residences as well as Towers Elementary School to be sensitive receptors (e.g., refer to Table 3.11-16 and Table 3.11-17 in Section 3.11, *Noise*).

*Comment PF-8*

The comment states that the Draft EIR incorrectly references TMC Section 13.9.7 as the sole decision-making body of the City of Torrance for the proposed RCFE Building and states that the retaining walls located in City of Torrance right-of-way would be subject to discretionary review by the Torrance Planning Commission per TMC Section 92.13.12(d). To clarify, Section 2.5.1.2, *Project Architecture and Design* does not state that TMC Section 13.9.7 is the sole decision-making body of the City of Torrance for the proposed RCFE Building, but rather describes the applicable policies and regulations for the proposed RCFE Building. In fact, Section 1.5, *Required Approvals* specifically acknowledges that the proposed Project would require *"City Engineer*

*approval of a building permit for retaining walls associated with the service area and loading dock entry/exit pursuant to TMC Section 92.13.2 (Torrance Engineering Division)."*

*Comment PF-9*

The comment states that coordination with the Torrance Fire Department (TFD) and the Torrance Police Department (TPD) is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, given that Flagler Lane is within the City of Torrance. Section 2.5.1.3, *Proposed Access, Circulation, and Parking* of the Draft EIR has been revised to clarify that BCHD would also coordinate with the TFD and TPD to prepare an Emergency Response Plan for elements of the proposed Project within the jurisdiction of the City of Torrance. Refer to the response to Comment PF-3 regarding the proposed access along Flagler Lane.

*Comment PF-10*

The comment states that the proposed construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. The construction haul routes proposed in the Draft EIR have been revised to avoid construction traffic conflicts. The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element. Refer to the response to Comment KB-3 as well as the Master Response 13 – Transportation Analysis for additional detailed discussion and response to comments pertaining to the revised construction haul routes.

*Comment PF-11*

The comment asserts that the description of the environmental setting along Flagler Lane is incomplete and must include descriptions of the single-family residential neighborhood to the east of the Project site and the school drop-offs and pick-ups at Towers Elementary School. Section 3.1.1, *Environmental Setting* of the Draft EIR has been revised to describe that between Beryl Street and Towers Street, Flagler Lane supports single-family residences within the City of Torrance as well as school drop-offs and pick-ups at Towers Elementary School. However, it should be noted that the EIR thoroughly describes the transportation network adjacent to the Project site within more applicable sections of the EIR (e.g., Section 3.14, *Transportation*).

*Comment PF-12*

The comment states that the City of Torrance was not consulted on the selection of representative views, and that the Draft EIR must consider the potential impacts to public views from locations at the cul-de-sac at Tomlee Avenue facing west and southwest, intersection at Towers Street and Mildred Avenue facing west, and intersection at Tomlee Avenue and Mildred Avenue facing west and northwest. However, for the following reasons, additional representative views from each of these locations were not selected to inform the analysis of aesthetics and visual resources in this EIR.

1. Cul-de-sac at Tomlee Avenue: Views from this location are largely obstructed by residential development and are already represented by Representative View 2 located approximately 330 feet to the southwest of the cul-de-sac. Additionally, Representative View 3, which is located 200 feet northwest of the cul-de-sac, provides direct uninterrupted views of the Project site at a location that is more heavily frequented by pedestrian foot traffic, bicycles, and vehicles.

2. Towers Street & Mildred Avenue Intersection: Views of the Project site from this location are located farther from the Project site and are already largely represented by Representative View 3, which is located approximately 300 feet to the west. Representative View 2 (Towers Street & Flagler Lane) was selected as it provides a much more direct view of the Project site from the same view direction.

3. Tomlee Avenue & Mildred Avenue Intersection: As described for the Towers Street & Mildred Avenue intersection, views of the Project site from this location are farther from the Project site and already largely represented by Representative View 3, located approximately 230 feet to the west and closer to the Project site.

To fully and accurately assess potential impacts associated with aesthetics and visual resources, a total of six representative views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. Two of these representative views – Representative Views 1 and 2 – are located within the residential neighborhood located directly to the east of the Project site, within the City of Torrance, while Representative View 3 is located at the corner of Dominguez Park directly adjacent to City of Torrance boundary. Many views elsewhere within the City of Torrance are often further away and views of the Project site are largely obstructed or obscured by existing development, trees, and power lines. These representative views were selected as they provide some of the greatest and most direct views of the Project site within the City of Torrance and are

generally representative of similar views from other areas within the City of Torrance. CEQA Guidelines Section 15151 states that *"[a]n evaluation of environmental effects of a proposed project need not be exhaustive…"* This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources need only identify those views that are the most representative and provide *"a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations"* (CEQA Guidelines Section 15151).

*Comment PF-13*

The comment requests that the Draft EIR consider the potential Project impacts on surrounding properties, specifically the residential neighborhood to the east, and the potential impact of the proposed Project to the existing uses in accordance with Torrance General Plan Land Use Element Policy 2.3. The Draft EIR does in fact consider the potential impacts on surrounding properties, including the residential neighborhood located adjacent to the east of the Project site, throughout the EIR. For example, two of the six representative views analyzed under Impact VIS-2 in Section 3.1, *Aesthetics and Visual Resources* are located within this residential neighborhood. Residences within this neighborhood are also described as sensitive receptors in Section 3.2, *Air Quality* as well as Section 3.11, *Noise* and as such, air quality and noise impacts to these receptors are thoroughly analyzed and mitigated to the maximum extent feasible in the EIR. Additionally, Section 3.14, *Transportation* of the Draft EIR describes the current level of cut-through traffic within this residential neighborhood and analyzes the potential for additional cut-through traffic during operation of the proposed Project. Therefore, the Draft EIR does consider the potential for Project-related impacts on surrounding property, including the residential neighborhood to the east of the Project site, in accordance with Torrance General Plan Policy LU.2.3.

The comment also requests that the Draft EIR consider the potential impacts to landscape and hardscape buffers, specifically where the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate in accordance with Torrance General Plan Land Use Element Policy 2.5. Torrance General Plan Policy LU.2.5 states *"Establish landscape or hardscape buffers between residential and non-residential uses, where appropriate, to minimize adverse effects."* As described in Section 2.5.1.1, *Proposed Uses* of the Draft EIR, *"[t]he perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and*

*Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening."* As described in Section 2.5.1.1, perimeter green space and landscaping would be intended to soften the campus interface and provide connections with the surrounding uses. Therefore, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts, consistent with Torrance General Plan Policy LU.2.5. Section 1.5, *Required Approvals*, also acknowledges that the Landscape Plan within the City of Torrance right-of-way would require *"approval pursuant to TMC Section 92.30.6 (Torrance Community Development Department)."*

Lastly, the comment states that the Torrance General Plan was adopted in 2010 and that Draft EIR incorrectly cites the Torrance General Plan as 2005. However, this 2005 reference is for the Torrance General Plan Land Use Policy Map, which uses geographic information system (GIS) data from 2005 (refer to Section 7.0, *References*). Other references to the Torrance General Plan throughout the EIR (e.g., Section 3.10, *Land Use and Planning*) accurately describe that the adoption in 2010.

*Comment PF-14*

The comment corrects the numbering of Torrance General Plan Community Resources Element Policy CR.1.2 and Objectives CR.4 and CR.19, which were swapped in the Draft EIR. The regulatory setting has been revised to correctly reference Torrance General Plan Community Resources Element policies and objectives. Additionally, Policy CR.4.3 is included in Table 3.1.3 of the Draft EIR to describe the proposed Project's consistency with this policy; however, this policy has also been added to Section 3.1.2, *Regulatory Setting* as requested by this comment. As described in the response to Comment PF-13 above, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts, consistent with Torrance General Plan Policy LU.2.5 as well as Policy CR.4.3.

*Comment PF-15*

The comment states that the Draft EIR must include TMC Section 92.30.2 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east, from outside equipment and roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls on all Project buildings. TMC Section 92.30.2 has been added to the regulatory setting as requested by this comment. As described in Table 3.1-2, mechanical equipment included in the proposed Project would be sited away from public streets and would be screened by proposed landscaping and other screening devices consistent with the architecture and color of the proposed

development. Therefore, the proposed mechanical equipment would be screened in compliance with RBMC Section 10-2.1530 as well as TMC Section 92.30.2.

The comment also claims that the EIR must include TMC Section 92.30.3, which includes restrictions on the enclosures of trash, loading, and storage areas to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane. However, as described in Section 2.5.1.4, *Utilities and Services*, trash and recycling collection facilities for residents, employees, and visitors would be provided within enclosures in the subterranean service and delivery zone below the proposed RCFE Building. This area would not be located within the City of Torrance right-of-way and would not be subject to TMC Section 92.30.3 (see the response to Comment PF-17). However, this element of the proposed Project would be subject to RBMC Section 10-5.1536 (Solid Waste Enclosures), which provides requirements for solid waste facilities, including the enclosures, material, access gate, and location of the solid waste facilities.

*Comment PF-16*

The comment requests that the Draft EIR consider further reduction of the RCFE Building height to preserve greater panoramic views of the Palos Verdes hills as currently viewed from Representative View 6 located at the Flagler Lane & 190th Street intersection. The comment also suggests that the EIR include visual aids/exhibits to demonstrate alternative methods for mitigation as well as the potential impacts to the existing view corridor resulting from Phase 2 development. However, the analysis in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 already provides a detailed computer-generated photosimulation demonstrating the potential impact to visual resources. Based on the Sight Line Study prepared by VIZf/x, the implementation of Mitigation Measure (MM) VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) at least 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). With this reduction, the maximum height of the proposed RCFE Building would rise to just below the ridgeline of the Palos Verdes hills from 190th Street & Flagler Lane. However, as described in MM VIS-1, this revision to the final design could include the removal of the uppermost stories of the building and/or recessing the building foundation further into the ground surface. While the preferred method would be to reduce the floor-to-ceiling heights to accommodate the height, a detailed design and 3D model has not yet been developed. Therefore, a detailed, photorealistic simulation cannot be prepared at this time. However, MM VIS-1 very clearly describes the requirements to reduce the impact to less than significant based on robust technical study

independently prepared by a licensed architect (i.e., by avoiding the interruption of the Palos Verdes ridgeline when viewed from Representative View 6).

As described in Impact VIS-1, the Phase 2 development program would result in the construction of a new building(s) ranging in height from 53 feet to 68 feet above ground level and a new parking structure, reaching a maximum height of 76 feet. However, given the height of the proposed development in Phase 2, it would not be visible behind the proposed RCFE Building. Therefore, the Phase 2 development program would not affect the wide-ranging panoramic view of the Palos Verdes ridgeline from Representative View 6 and no further visual aids or analyses are required.

The comment also recommends consideration of alternative mitigation measures, such as methods for mitigation including repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street & Flagler Lane. However, repositioning the building or requiring stepbacks in building height would not address the interruption of the Palos Verdes ridgeline. As described in Impact VIS-1 and MM VIS-1 a reduction in the total building height is required. Nevertheless, it should be noted that the proposed Project would be subject to a Planning Commission Design Review (Redondo Beach Municipal Code [RBMC] Section 10-2.1116) and these comments will be provided to the BCHD Board of Directors as well as the City of Redondo, as a responsible agency for consideration during deliberation on the proposed Healthy Living Campus Master Plan.

*Comment PF-17*

The comment claims that the analysis provided in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2 is not consistent with the Torrance General Plan and asserts that the proposed RCFE Building would change the visual character of the Project site. The comment specifically notes that the building would be visually prominent, substantially taller than the existing buildings on-site, and larger than the buildings in the vicinity.

It should be noted that the EIR very clearly acknowledges the height of the proposed building. For example, refer to Table 3.1-1 which describes the relationship of the proposed RCFE Building to other buildings within the Beach Cities and Torrance over 70 feet in height. As described for Representative View 2, Representative View 3, and Representative View 4, the proposed RCFE Building would be visually prominent and would noticeably alter the existing views of the Project site from these locations, including reducing blue sky views. However, the development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from these locations. In fact, the proposed Project includes many attributes that

would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm.

With regard to the Phase 2 of the proposed Healthy Living Campus Master Plan, the analysis provided in Impact VIS-2 does programmatically assess the proposed development. To accomplish this, the analysis uses visual renderings for three example site plans and describes the potential impacts associated with the maximum buildings heights. Take for example the discussion of the proposed parking structure when viewed from Representative View 1 within the City of Torrance:

> *"Each of the example site plan scenarios would involve the construction of a multi-level parking structure along the eastern perimeter of the Project site. This would result in a net increase in the overall height compared to the existing parking structure at 512 North Prospect Avenue, which currently provides 3 above ground levels. Under any of the example site plan scenarios the proposed parking structure would likely be visible from Representative View 1, located within the Torrance neighborhood to the east of the campus. However, at a maximum height of 81 feet, this parking structure would be more than 20 feet shorter than the proposed RCFE Building. As such, the parking structure would be just barely visible over the single-family houses and would not substantially obscure the view of the open sky above."*

Refer to the response to Comment PF-3 regarding the suggest repositioning or stepdown in building heights.

*Comment PF-18*

The comment expresses concern regarding lighting impacts to the residential neighborhood east of the Project site, including from surface level parking lot, building, and landscape lighting. The

surface parking lots associated with the proposed Project would be located at the southern and western portions of the Project site would not affect residences to the east of the Project site within the City of Torrance given the distance, change in elevation, and obstruction by buildings on the Project site. As described in Impact VIS-3, outdoor lighting at the Project site would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with TMC Section 92.30.5 and these design guidelines. Lighting on-site would also be screened by proposed trees and landscaping. The parking structure developed in Phase 2 of the proposed Project would rise to a maximum height of 81 feet and would be visible by the adjacent sensitive receptors to the east within the City of Torrance. However, the parking structure would include standard treatments to avoid light spillover, including: 1) solid parapet walls at least 42 inches high at each garage level and ramps; 2) planted screening at lower floor levels; and 3) screening at openings for upper levels.

Lighting within the City of Torrance right-of-way would also comply with TMC Section 92.30.5, which limits the intensity and impacts of night lighting and requires lighting be directed away from all surrounding residential land uses. Compliance with the Redondo Beach Design Guidelines and the TMC would ensure the new light sources associated with the proposed Project would not substantially affect off-site light-sensitive receptors surrounding the Project site..

*Comment PF-19*

The comment states that Impact VIS-4 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to existing and future solar collectors atop single-family residences located in the residential neighborhood to the east. Section 3.1.1, *Environmental Setting* of the EIR has been revised to more specifically describe the existing solar collectors atop single-family residences located in the neighborhood to the east of the Project site. However, these residences are already included in the list of shade-sensitive receptors considered in Impact VIS-4. As described in Impact VIS-4 shadow-sensitive land uses adjacent to the Project site consist of residential buildings, including windows and private yards at most houses, Towers Elementary School to the east, and Dominguez Park to the northeast. The vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center during the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the campus and the residences within the City of Torrance below. Shadow-sensitive uses, including the existing residences and associated rooftop solar collectors, to the east of the Project site would not be shaded by the proposed structures for

more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be less than significant.

*Comment PF-20*

The comment describes the threat of urban coyotes in the region and recommends considering California native plant species and drought-tolerant planting in an exposed planting plan to avoid attracting habitat for urban coyotes. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees consistent with the existing landscaping on-site and in the vicinity (refer to Figure 2-9). Further, as described in Section 1.5, *Required Approvals*, the landscape plan for the proposed Project would require approval from the Torrance Community Development Department pursuant to TMC Section 92.30.6. BCHD is committed to working collaboratively with the City of Torrance to develop a landscape plan that is suitable for approval.

*Comment PF-21*

The comment incorrectly claims that the EIR neglects to identify and analyze the slope and series of retaining walls along the eastern border of the Project site. Existing geologic and soils hazards at the Project site, including but not limited to liquification, landslides, slope instability, subsidence, and differential settlement, were thoroughly assessed based on the Geotechnical Report prepared by Converse Consultants (2016) and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation, and California Emergency Management Agency (Cal EMA). Section 3.6, *Geology and Soils* specifically describes under Impact GEO-1:

> *"…according to the CGS Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone (CGS 2019a). Similarly, according to the Redondo Beach Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides (City of Redondo Beach 2019). Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very*

*low (Converse Consultants 2016). Therefore, required compliance with the CBC would ensure that potential impacts associated with landslides would be less than significant."*

*Comment PF-22*

The comment requests coordination with the TFD and TPD to prepare an Emergency Response Plan for emergency access on Flagler Lane. Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials* of the EIR has been revised to clarify that BCHD would coordinate with the TFD and TPD to prepare an Emergency Response Plan for elements of the proposed Project within the jurisdiction of the City of Torrance.

*Comment PF-23*

The comment states that Impact LU-1 is not consistent with the Torrance General Plan and conflicts with the TMC. The goes on to claim that the EIR errors in stating the analysis of potential conflicts with the Torrance General Plan are limited to the proposed development within the City of Torrance right-of-way, and that the EIR should consider the entirety of the proposed Project for potential conflicts with the Torrance General Plan. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way, which are relatively minor components of the proposed Project, would require permits issued by the City of Torrance. However, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the campus beyond the municipal boundaries. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are thoroughly addressed in Table 3.10-5. The final determination of consistency with individual policies will be the responsibility of the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. Nevertheless, as required under CEQA, the EIR discloses and discusses potential consistency with such policies for consideration by City decision-makers and staff.

*Comment PF-24*

The comment states that the Draft EIR must include TMC Sections 92.30.2 and 92.30.3 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east. Refer to the response to Comment PF-23. As described therein, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the campus beyond the municipal boundaries.

*Comment PF-25*

The comment asserts that the EIR must include is subject to TMC Section 92.13.12(d), which states that no fence, wall, or hedge shall exceed 8 feet and 5 feet in height, respectively. Refer to the response to Comment PF-8.

*Comment PF-26*

The comment incorrectly claims the EIR understates the conflict with access to Flagler Lane and does not consider other Project alternatives that do not access Flagler Lane. However, as noted in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives,* the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. Refer to the response to Comment PF-3.

*Comment PF-27*

The comment requests specification in MM NOI-1 that construction is prohibited on Sundays and Holidays observed by Torrance City Hall pursuant to TMC Section 6-46.3.1, and that the arrival times of workers, construction vehicles and materials should adhere to the allowable hours as specified. MM NOI-1 does specify that *"[c]onstruction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday to the maximum extent feasible, in accordance with RBMC Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1."* MM NOI-1 also notes that the Construction Noise Management Plan would require approval by the Torrance Building & Safety Division, in accordance with TMC Section 46.3.1, for construction activities occurring with the City's jurisdictional limits. BCHD is committed to working collaboratively with the City of Torrance to develop a Construction Noise Management Plan that is suitable for approval.

The comment also requests identification in MM NOI-1 of which agency will enforce construction noise violations and respond to noise complaints. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified it Table 11-1. As described in MM NOI-1, *"BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to*

*call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues."*

The comment also recommends consideration of additional methods to mitigate significant and unavoidable construction noise impacts, such as repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases. Refer to the response to Comment PF-3.

*Comment PF-28*

The comment states that the proposed construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. Refer to the response to Comment PF-10.

*Comment PF-29*

The comment states that pursuant to TMC Section 46.7.2(c) residential and commercial noise limits are adjusted during certain noise conditions. The comment recommends that the EIR consider these noise limit adjustments to identify potential operational noise impacts. The comment also recommends considering additional methods for mitigation of operational noise levels from outdoor events, such as restricting amplified noise at outdoor events to between 7:00 a.m. to 7:00 p.m. Sunday through Thursday and 7:00 a.m. to 10:00 p.m. on Friday and Saturday, and limiting the number of outdoor events altogether. The EIR acknowledges that BCHD would be responsible for compliance with the applicable local noise ordinances. MM NOI-3b specifically states, *"[t]he Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the RBMC and TMC."* Additionally, MM NOI-3c would require the proposed Aquatics Center to *"close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria."* The complete elimination of outdoor activities at the campus is neither warranted nor required to comply with the applicable local noise ordinances.

The comment recommends considering methods to reduce operational noise impacts such as repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases. As described in Section 3.11, *Noise*, operational noise associated with the proposed Project would primarily be related to heating, ventilation, and air conditioning (HVAC) equipment, the proposed electrical yard, delivery and service trucks, emergency vehicles,

parking operations in the proposed parking lot and parking garage, roadway noise, and the proposed outdoor function areas. Noise from the delivery and service trucks and the proposed outdoor function areas are the only sources of operational noise considered to have the potential to result in significant noise impacts at sensitive receptors. Implementation of MM NOI-3a (Delivery Truck Hours and Idling) and MM NOI-3b (Events Management Plan) would reduce noise levels resulting from operation of the proposed Project. Additionally, MM NOI-3c (Outdoor Pool Activities) would require the Aquatics Center, specifically the outdoor pool and deck area would close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria. As such, the required mitigation measures in Section 3.11, *Noise* sufficiently mitigate operational noise to less than significant levels and additional measures are not needed to mitigate operational noise levels from the RCFE Building.

*Comment PF-31*

The comment recommends considering methods to reduce operational noise impacts from the proposed parking structure, such as covering driving surfaces with materials that reduce noise from tires and lining the parking structure exterior with screening materials (e.g., screen wall with planters). As described in Section 3.11, *Noise*, due to the relatively high level of traffic noise along streets in the vicinity of the Project site, normal daytime parking garage $L_{eq}$ noise of 56 dBA would likely be imperceptible. Therefore, noise impacts relating to parking operations would result in less than significant operational noise impacts. Additionally, as previously described, the perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees to provide landscape screening. This proposed Project landscaping would further reduce noise levels associated with the operation of the proposed parking garage. Additional measures are not needed to mitigate operational noise levels from the RCFE Building.

*Comment PF-32*

The comment requests elimination of the proposed driveways on Flagler Lane and revision of the entire EIR and appendices to implement this change. However, the EIR notes in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives* that the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. As such, Section 5.0, *Alternatives* considers four alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane.

The comment also requests clearly stating that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and is not a mitigation for any cut-through traffic that the proposed development will introduce. However, it is clearly stated in the environmental setting of Section 3.14, *Transportation* that existing cut-through traffic between Beryl Street and Del Amo Boulevard associated with commuting as well as student pick-up and drop-off at Towers Elementary School is a safety concern and that the City of Torrance is currently planning to pilot a temporary one-way partial closure of southbound traffic on Flagler Lane between Towers Street and Beryl Street to reduce existing cut-through traffic and associated safety risks between Beryl Street and Del Amo Boulevard. The EIR does not imply that this pilot is in any way connected to the proposed Project. Further, the EIR does not imply that this pilot planned by the City of Torrance is a mitigation for cut-through traffic associated with the proposed Project. As described in Section 3.14, *Transportation*, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by taking a right off of Flagler Lane and exit taking a left turn onto northbound Flagler Lane. Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to long-term parking on the campus and as such, would not be a primary entrance. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood. Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation, the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods. Therefore, the proposed Project would not contribute to operational safety hazards related to cut-through traffic and does not require mitigation for cut-through traffic.

Additionally, the cumulative impacts discussion in Section 3.14, *Transportation* notes that if the City of Torrance's temporary one-way closure of southbound traffic on Flagler Lane is successful and neighborhood residents support it, the one-way closure could become permanent. This would preclude access for service and delivery vehicles to the subterranean proposed service area and loading dock beneath the proposed RCFE Building. For this reason, an alternative to the proposed

Project with a revised access and circulation scheme is considered under Alternatives 3, 4, 5, and 6 in Section 5.0, *Alternatives*.

*Comment PF-33*

The comment requests that the EIR emphasize that the BCHD Bike Path Project is independent of the proposed Project, and is already funded through a Measure M Metro Sustainability Implementation Plan Grant, and will be implemented regardless of the proposed Healthy Living Campus Master Plan provided that all necessary environmental clearances and approvals are secured from the cities of Redondo Beach and Torrance. As described in the cumulative impacts discussion of Section 3.14, *Transportation*, *"BCHD is coordinating the BCHD Bike Path Project (separate from the proposed Project) with the City of Redondo Beach and the City of Torrance to develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street."* This discussion has been revised to clarify the grant funding source to further substantiate that these are two separate and distinct projects.

*Comment PF-34*

The comment states that the construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. Refer to the response to Comment PF-10.

*Comment PF-35*

The comment requests elimination of the proposed driveways on Flagler Lane and revision of the trip distribution to implement this change. As previously noted in response to Comment PF-32, the EIR notes in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives* that the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. As such, Section 5.0, *Alternatives* considers four Project alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. For further detail on Project Alternatives, see Section 5.0, *Alternatives*.

*Comment PF-36*

The comment requests that the thresholds in the Non-CEQA Intersection Operational Evaluation (see Appendix J) be consistent with those provided by the City of Torrance in its July 29, 2019 comment letter. These thresholds have been reviewed for consistency with the July 29, 2019 comment letter and updated, where necessary.

*Comment PF-37*

The comment requests providing additional information that Flagler Lane south of Beryl Street is a local street. The EIR does note the designation of Flagler Lane south of Beryl Street as a local street in Section 3.14.1, *Environmental Setting*. The description of Flagler Lane has been revised to further clarify that Flagler Lane is considered a local street between Towers Street and Beryl Street.

*Comment PF-38*

The comment states that coordination with the TFD and TPD is required to prepare an Emergency Response Plan. Refer to the response to Comment PF-9.

*Comment PF-39*

The comment requests clearly stating that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and is not a mitigation for any cut-through traffic that the proposed development will introduce. Refer to the response to Comment PF-32.

*Comment PF-40*

The comment recommends consideration of repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190$^{th}$ Street and Flagler Lane. Refer to the response to Comment PF-3.

*Comment PF-41*

The comment requests visual aids/exhibits for Alternative 6 to demonstrate the reduced height and again recommends consideration of repositioning the proposed RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190$^{th}$ Street & Flagler Lane. An exhibit of Alternative 6 is provided in Figure 5-2; however, as described for MM VIS-1, a detailed design

and 3D model has not yet been developed for Alternative 6. Nevertheless, given that the alternative would reduce the height of the building by more than the required 20 feet and 3 inches identified in the Sight Line Study prepared by VIZf/x, this alternative would clearly avoid the impact described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1.

*Comment PF-42*

The comment notes that Table ES-2 and Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in Tables ES-2 and 5.5-5; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

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**Letter WB**

June 8, 2021
William Brand, Mayor
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

*Comment WB-1*

The comment expresses appreciation toward the Beach Cities Health District (BCHD) for notifying the City of Redondo Beach that Draft EIR has been published. The comment goes on to stat City of Redondo Beach has prepared comments for consideration in the Final EIR. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

*Comment WB-2*

The comment provides a summary of the proposed Project, including the Phase 1 site development plan and the Phase 2 development program. Again, this comment has been received and incorporated into the Final EIR as a part of the responses to comments.

*Comment WB-3*

The comment recognizes that the Phase 2 development program was evaluated at a programmatic level, but notes that there are specific details of the development program that were not analyzed. The comment requests that any future consideration of Phase 2 should begin with a Subsequent EIR. As discussed in Section 1.1, *Overview,* the EIR evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a

programmatic level of detail. This approach to analysis is not uncommon, and is in fact specifically called for under California Environmental Quality Act (CEQA) Guidelines Section 15165. Refer to BCHD Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to this issue. As described there in, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment WB-4*

The comment states the EIR does not address how MM VIS-1 would be met under the proposed Project, including how or if the same square footage would be constructed and distributed across the Project site. As described in Section 3.1, *Aesthetics and Visual Resources*, MM VIS-1 is proposed to reduce the impact of the proposed Project on scenic views of the Palos Verdes ridgeline. Based on the Sight Line Study prepared by VIZf/x, the implementation of MM VIS-1 would require a reduction in the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) to approximately 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). This could be addressed through a reduction in the floor-to-floor ceiling height, recession of the building into the ground surface, or removal of the uppermost stories. In the case that the uppermost stories were removed under MM VIS-1, this square footage would not be redistributed across the Project site.

As stated in Section 5.5.6, *Alternative 6 – Reduced Height Alternative*, Alternative 6 is separately considered due to the fact that the financial feasibility of implementing MM VIS-1 was not certain at the time that the Draft EIR was prepared. For example, a reduction in floor height would remove programmable revenue-generating space in the RCFE Building and excavation to recess the building further below the ground surface would be costly. Therefore, in the event that MM VIS-1 could not be implemented an alternative would still be available to the BCHD Board of Directors

to avoid the potentially significant impact to scenic vistas identified in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1.

*Comment WB-5*

The comment recommends that the EIR provide an alternative that addresses meeting the restriction of 0.5 floor area ratio (FAR) in the C-2 zoned parcel (i.e., the vacant Flagler Lot) should the distinct criteria for the zoning variance not be met. It should be noted that since the release of the Draft EIR and the receipt of this comment, revisions to the building footprint and associated FAR have been incorporated by pulling the building footprint further back from Beryl Street. These revisions are described in Section 2.0, *Project Description* and Section 3.10, *Land Use and Planning* of the Final EIR. This minor revision, which would reduce the development density on the vacant Flagler Lot, does not meet any of the triggers for recirculation described under California Environmental Quality Act (CEQA) Guidelines 15088.5. It should also be noted that each of the alternatives described in Section 5.0, *Alternatives* already meets the 0.5 FAR in the C-2 zoned parcel.

*Comment WB-6*

The comment requests that the EIR address the uncertainty resulting from discretion of the Planning Commission for the allowable FAR, maximum height restrictions, and setbacks in the P-CF Zone during Planning Commission Design Review. The EIR appropriately describes a reduction in height of the proposed RCFE Building necessary to avoid a potentially significant impact to scenic vistas. However, as described further in Master Response 9 – Aesthetics and Visual Resources the analysis does not find any other potentially significant impacts that would warrant further reductions in building height or additional setbacks. Alternative 6 provides a reduced height alternative in the event that the decision-makers determine that MM VIS-1 cannot feasibly be implemented. Therefore, while BCHD acknowledges the City's discretion in the Planning Commission Design Review, the EIR is not required to speculate on the potential outcomes.

*Comment WB-7*

The comment expresses appreciation for attention to these comments and introduces additional comments on the Draft EIR in Attachment A. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

*Comment WB-8*

The comment recommends listing the reports and plans required as part of mitigation measures along with the timing and requirements of the reports/plans. Consistent with CEQA Guidelines Section 15097, a complete list of all mitigation measures required for the proposed Project, including required reports, timing, and other requirements of the mitigations, are provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring and reporting actions are identified it Table 11-1.

*Comment WB-9*

The comment notes that RBMC Section 10-5 is the zoning code for areas within the California Coastal Zone and states that RBMC Section 10-2 is the zoning code applicable to the Project site. After a detailed review, references to RBMC Section 10-5 in the Draft EIR were found only in Section 3.1.2, *Regulatory Setting*. References to RBMC Section 10-5 have been updated to the equivalent policies provided in RBMC Section 10-2, where applicable.

*Comment WB-10*

The comment asserts that there is no enforcement for MM GEO-2b, which requires that, in the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made. As described in Section 3.6.3, *Impact Assessment and Methodology*, the methodology of the paleontological resources analysis is consistent with the Society of Vertebrate Paleontology (SVP) *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. As described in SVP's guidelines, non-paleontologists may monitor for fossils for excavations in rock units determined by a qualified professional paleontologist to have low potential, such as the Quaternary-aged alluvium deposits within the Project site. If potential paleontological resources are discovered during excavations in a rock unit with low potential, all ground disturbance in the vicinity of the find should stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate salvage, treatment, and future monitoring and mitigation. If workers do not cease grading in the vicinity of the find, the workers and construction contractor would be subject to penalties under the applicable Federal, State, and local laws. Therefore, MM GEO-2b is consistent with the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*.

*Comment WB-11*

The comment claims it is unclear why MM NOI-1 states that compliance with the City's construction hour regulations would be followed "o the maximum extent feasible. This mitigation measure has been revised to simply state that the proposed construction activities would comply with the RBMC Sections 4-24.503. However, it should be noted that RBMC Section 4.24-503 does provide limited provisions for the Building Official to permit construction activity during periods prohibited by subsection (a).

*Comment WB-12*

The comment clarifies that the Redondo Beach Public Works Department, Engineering Division is responsible for issuing after-hours construction permits. MM NOI-1 has been revised for clarification.

*Comment WB-13*

The comment states that approvals have different timeframes for various agencies and City divisions and that MM T-2 identified in the EIR should not limit an agency to a specific timeframe. MM T-2 does not limit an agency to a specific timeframe as the comment suggests, but rather MM T-2 specifies that BCHD must coordinate construction with affected agencies in advance of start of work. MM T-2 has been revised in the Final EIR to clarify that required City approvals may take up to 2 weeks or longer for each submittal.

*Comment WB-14*

The comment notes that there is no mention of compliance with the City's adopted Model Water Efficiency Landscape Ordinance in the Executive Summary. The Regulatory Setting in Section 3.15, *Utilities and Service Systems* provides RBMC Section 10-2.1900 (Landscaping Regulations), which adopts the California State Model Water Efficiency Landscape Ordinance by reference. Further, as described in Section 1.5, *Required Approvals* of the EIR, the proposed landscape plan for the proposed Project would require approval from the Redondo Beach Building & Safety Division pursuant to RBMC Section 10-2.1900. BCHD is committed to working collaboratively with the City of Redondo Beach to develop a landscape plan that is suitable for approval.

*Comment WB-15*

The comment notes that Table ES-2 of the Draft EIR does not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in

Tables ES-2 and 5.5-5; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

*Comment WB-16*

The comment notes that the Reader's Guide does not explain if the 0.30 to 1.50 inches of rainfall is the rate or the total and requests this be clarified in the Final EIR. As discussed in Section 3.9, *Hydrology and Water Quality*, the 85$^{th}$ percentile 24-hour rain event is expected to result in 0.30 to 1.50 inches of rainfall. Therefore, the 0.30 to 1.50 inches of rainfall is the rate of rain during a 24-hour period. Section 3.9 of the Reader's Guide has been revised to clarify the rate of rainfall described.

*Comment WB-17*

The comment claims that the EIR does not mention the required Planning Commission Design Review and that permits are only described for the P-CF zone. The required Planning Commission Design Review pursuant to RBMC Section 10-2.1806 is described in Section 1.5, *Required Approvals* and various other locations throughout the EIR, including Section 3.1, *Aesthetics and Visual Resources* as well as Section 3.10, *Land Use and Planning.* Section 1.5, *Required Approvals* has been revised to clarify that the proposed development within the C-2 zone would also require a CUP.

*Comment WB-18*

The comment states that shared parking is overseen by the Redondo Beach Planning Division, rather than the Building & Safety Division. This comment has been noted and Section 1.5, *Required Approvals* has been revised to clarify the correct city division for oversight of shared parking.

*Comment WB-19*

The comment notes that the EIR does not describe whether the proposed bicycle facilities would be available to the general public or to BCHD employees only. As described in Section 3.14, *Transportation*, bicycle parking would be provided for both visitors and employees of the proposed campus. Specifically, as described in MM T-1, BCHD would be required to expand the proposed on-site bicycle facilities (i.e., shower, racks, and lockers) for BCHD employees as well as maintain and expand on-site bicycle parking for BCHD visitors in an amount and location informed by visitor surveys and annual monitoring reports. Further, as described in Section 2.5.2.1, *Proposed Uses*, the proposed Aquatics Center would include dressing rooms with lockers, restrooms, and showers for campus visitors.

*Comment WB-20*

The comment claims that a gas yard is shown on site plans but is not described in the EIR and impacts from the gas yard should be evaluated. As shown in the site plans and noted by the "(E)" next to the label for the gas yard, the gas yard is an existing feature on the Project site adjacent to the east of the existing parking structure and the perimeter road. The gas yard would not be demolished, relocated, or otherwise affected during Project construction. Therefore, no impacts would result from the existing gas yard on-site. Impacts associated with the proposed Southern California Edison (SCE) Substation have been described in detail, with additional information provided in Section 3.8, *Hazards and Hazardous Materials* as well as Section 3.11, *Noise* in response to comments received on the Draft EIR.

*Comment WB-21*

The comment requests the EIR include an analysis of impacts associated with the proposed Southern California Edison (SCE) Substation. Refer to Master Response 12 – Noise Analysis as well as Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for a detailed discussion and response to comments pertaining to this issue.

*Comment WB-22*

The comment provides recommendations for construction activities, including using the southerly and northerly driveways along North Prospect Avenue for construction vehicles (rather than the central driveway) and considering interim preferential parking along specific westerly North Prospect Avenue (Beryl to Diamond), North Prospect Avenue frontage road, and surrounding streets (i.e., first blocks of Diamond and Beryl) to keep BCHD employees, guests/visitors and construction workers from parking in the residential neighborhood streets. These recommendations have been noted. As described in Section 3.14, *Transportation*, BCHD shall prepare, implement, and maintain a Construction Traffic and Access Management Plan subject to review and approval by the Redondo Beach Engineering Division. BCHD is committed to working collaboratively with the City of Redondo Beach to develop a Construction Traffic and Access Management Plan that is suitable for approval.

The comment also recommends providing dust and noise screening/blankets along the perimeter of the Project site. The EIR provides mitigations that would require dust and noise suppression at the Project site during construction. For example, as described in Section 3.2, *Air Quality*, MM AQ-1 would require several measures during all construction activities to control dust, including quick replacement of ground cover in exposed areas; watering of all exposed surfaces and unpaved haul roads three times daily; covering all stock piles with tarp; limiting traffic to 15 miles per hour

(mph) or less on unpaved roads; prohibiting demolition when wind speed is greater than 25 mph; sweeping streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads; covering or having water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas; and installing wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip. Additionally, MM NOI-1 would require the construction of noise barriers to reduce noise levels to on- and off-site sensitive receptors as well as other construction noise best management practices (BMPs) and measures to reduce construction noise levels.

*Comment WB-23*

The comment requests a list of the reports and plans required as part of mitigation measures along with the timing and requirements of the reports/plans. As described in respond to Comment WB-8, a list of all mitigation measures required for the proposed Project, including required reports, timing, and other requirements of the mitigations, is provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring and reporting actions are identified it Table 11-1.

*Comment WB-24*

The comment recommends adding Redondo Beach General Plan Land Use Element Goal 1K, Objective 1.46, and Objective 1.53 to the Regulatory Setting in Section 3.1, *Aesthetics and Visual Resources*, as they relate to the goals and policies that have already been provided. These goals and objectives have been added to Section 3.1, *Aesthetics and Visual Resources* as recommended.

*Comment WB-25*

The comment states that Redondo Beach General Plan Parks and Recreation Element Policy 8.2a.8 is only applicable to the Coastal Area of the City and therefore, is not applicable to the Project site. Policy 8.2a.8 has been removed from Section 3.1.2, *Regulatory Setting* as well as from Table 3.1.2.

*Comment WB-26*

The comment states that implementation of MM VIS-1 would reduce impacts related to privacy and shade/shadow effects, which should be discussed in the residual impacts discussion under Impact VIS-1. As described further in Master Comment Response 9 – Aesthetics and Visual Resources Analysis, CEQA requires an assessment of impacts to public views rather than private views and privacy, and the proposed RCFE Building would not create direct sight lines into private interior living spaces of nearby Torrance residences due to the distance and high angle of the views.

As described in Impacts VIS-4, shade and shadow effects associated with the proposed RCFE Building were determined to be less than significant. Nevertheless, the residual impacts discussion under Impact VIS-1 and the discussion in Impact VIS-4 have been revised to describe that the implementation of MM VIS-1 would further reduce impacts related to shade and shadow.

The comment also incorrectly claims that the EIR does not analyze the reduced height as a Project alternative. The EIR analyzes the potential impacts of Alternative 6 – Reduce Height Alternative in Section 5.0, *Alternatives*. Under Alternative 6, approximately 88,800 sf of building space would be removed from the top 2 stories of the proposed RCFE Building to avoid the potentially significant impact to scenic vistas identified in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1. Refer to the response to Comment WB-4.

*Comment WB-27*

The comment claims that Redondo Beach General Plan Parks and Recreation Element should not be applicable to the Project site since it is not dedicated parkland. This comment has been noted and the Redondo Beach General Plan Parks and Recreation Element has been removed from the analysis in Section 3.1, *Aesthetics and Visual Resources*.

*Comment WB-28*

The comment states that the EIR describes a 121.5-foot tall building and a 133.5-foot tall building, both of which creating a 404.5-foot shadow during the Winter Solstice. This typographical error has been corrected. The City of Los Angeles CEQA Thresholds Guide (2006) states as an example of shadow multipliers that:

> *"The shadow length multiplier values represent the length of a shadow proportional to the height of a given building, at specific times of day. Hence, a building of 100 feet in height would cast a shadow 303 feet long at 9:00 a.m. during the Winter Solstice."*

Impact VIS-4 correctly describes that the RCFE Building would reach a maximum height of 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below. This single building is projected to cast shadows up to 404.5 feet long during the Winter Solstice.

*Comment WB-29*

The comment requests that the Draft EIR provide additional visual aids/exhibits of the proposed Project and alternatives to demonstrate compliance with referenced city goals, objectives, and policies. Section 3.1, *Aesthetics and Visual Resources* currently provides photosimulations of the proposed Project from six different representative views, which were selected in coordination with

the City of Redondo Beach. CEQA Guidelines Section 15151 states that *"[a]n evaluation of environmental effects of a proposed project need not be exhaustive…"* This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources need only identify those that are the most representative and would provide *"…a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations"* (CEQA Guidelines Section 15151).

Based on the Sight Line Study prepared by VIZf/x, a licensed architect specializing in the analysis of visual resources impact, the implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) at least 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). With this reduction, the maximum height of the proposed RCFE Building would rise to just below the ridgeline of the Palos Verdes hills from 190th Street and Flagler Lane. However, as described in MM VIS-1, this revision to the final design could include the removal of the uppermost stories of the building and/or recessing the building foundation further into the ground surface. While the preferred method would be to reduce the floor-to-ceiling heights to accommodate the height, a detailed design and 3D model has not yet been developed. Therefore, a detailed, photorealistic simulation cannot be prepared at this time. However, MM VIS-1 very clearly describes the requirements to reduce the impact to less than significant based on robust technical study independently prepared by a licensed architect (i.e., by avoiding the interruption of the Palos Verdes ridgeline when viewed from Representative View 6).

*Comment WB-30*

The comment suggests adding Redondo Beach General Plan Land Use Element Policies 1.55.8-1.55-10 to Section 3.3, *Biological Resources*. These policies along with Policy 1.55.7, which establish water conservation strategies through irrigation and landscaping, are applicable to the assessment of water demand or supply in Section 3.15, *Utilities and Service Systems*. Accordingly, these policies have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-31*

The comment notes that the existing buildings on-site have not been formally reviewed by the Redondo Beach Preservation Commission and that it would be more accurate to state in Section 3.4, *Cultural Resources* that the buildings are not identified as potential resources in the City's Historic Resource Survey. The language in Section 3.4.1, *Environmental Setting* has been revised

to more accurately describe the review process for these buildings, consistent with this recommendation.

*Comment WB-32*

The comment notes that the property at 328 N. Gertruda Avenue is one of many properties within the Gertruda Avenue Historic District and that the entire district should be referenced in Table 3.4-1 within Section 3.4, *Cultural Resources and Tribal Cultural Resources*. It should be noted that the City of Redondo Beach Historical Resources Register does not identify the property at 328 N. Gertruda Avenue as being within the Gertruda Avenue Historic District and the Historic District list does not include this property. Rather the City of Redondo Beach's Historical Resources Register lists the property at 328 N. Gertruda Avenue within the Original Townsite Historic District, as noted in Table 3.4-1 of the Draft EIR. Nevertheless, given that the Original Townsite Historic District and Gertruda Avenue Historic District are partially located within 0.5 miles of the Project site, these historic districts have been added to Table 3.4-1. The title of Table 3.4-1 has been revised to clarify that it includes Historic Architectural Resources in Redondo Beach within 0.5 miles of the Project site.

*Comment WB-33*

The comment suggests clarifying in Table 3.4-1 that the property at 820 Beryl Street is a potentially historic resource within the City of Redondo Beach's Historic Resource Survey, but is not currently designated as a local landmark. Table 3.4-1 clearly states that the status of the property at 820 Beryl Street is "Locally Significant," rather than "Local Landmark" as described for the Morrell House and Queen Anne House at Dominguez Park. However, an additional note has been added to Table 3.4-1 to further clarify that the *"property located at 820 Beryl Street was determined to be a potentially historic resource within the City of Redondo Beach's Historic Resource Survey; however, this property has not been designated as a Local Landmark."*

*Comment WB-34*

The comment states that the cities of Redondo Beach and Torrance shall have oversight and enforcement capabilities to ensure BCHD complies with the recommendations and specifications of the Geotechnical Report prepared for the proposed Project. As described in MM GEO-1, City of Redondo Beach and City of Torrance permit compliance staff shall observe and ensure compliance with the recommendations and specifications of the Geotechnical Report during grading and construction activities associated with the proposed Project. MM GEO-1 has been revised to further clarify that BCHD would be required to comply with the recommendations and specifications of the Geotechnical Report and that the cities would be required to review all final

grading plans, design drawings, and construction plans, as appropriate, and observe earthwork and grading to ensure compliance with these recommendations and specifications.

*Comment WB-35*

The comment claims that there is no enforcement for MM GEO-2b, which requires that, in the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made. Refer to the response to Comment WB-10.

*Comment WB-36*

The comment states than MM GEO-2a does not provide contingency for employees that may be hired mid-project after initial training has been conducted. However, MM GEO-2a requires that all workers attend awareness training regarding the paleontological resources that may occur onsite. As described in MM GEO-2a, the qualified paleontologist shall develop worker attendance sheets to record workers' completions of the awareness session. Further, MM GEO-2a requires that BCHD provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested. To further ensure enforcement of the worker awareness training for workers starting after the initial awareness training, MM GEO-2a has been revised to include that the worker awareness session for paleontological resources shall occur, *"prior to the initiation of excavation and grading activities or prior to the start of work on-site for new workers hired after the initial awareness session."*

*Comment WB-37*

The comment suggests including Redondo Beach General Plan Transportation and Circulation Element Policy 16 in Section 3.7, *Greenhouse Gas Emissions and Climate Change*. Policy 16 has been added to Section 3.7.1, *Regulatory Setting*.

*Comment WB-38*

The comment suggests altering the description of Project 12 and adding another similar Caltrans project in Table 3.0-1 in Section 3.0.2, *Cumulative Impacts*. These projects have been revised in Table 3.0-1, as recommended.

*Comment WB-39*

The comment states that volatile organic compounds (VOCs) should be remediated to the required regulatory standards and measures in place, and ensure that future contamination does not further migrate from the possible source onto the site. As described in Section 3.8, *Hazards and Hazardous Materials*, the implementation of MM HAZ-2a through -2d would ensure VOC compounds and contaminated soils are properly detected, removed, and handled during ground disturbing activities. For example, MM HAZ-2a would require preparation and implementation of a Soils Management Plan, which would be subject to review by the City of Redondo Beach as well as the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division, Los Angeles Regional Water Quality Control Board (RWQCB), and City of Torrance. MM HAZ-2b and -2c would require soil vapor monitoring and soil vapor extraction equipment. MM HAZ-2d would require that construction activities cease in the event that previously unknown or unidentified soil and/or groundwater contamination. With implementation of MM HAZ-2a through -2d, the risk of an accidental release of hazardous materials into the environment during construction of the proposed Project would be less than significant with mitigation.

*Comment WB-40*

The comment suggests that BCHD should properly mitigate and follow regulatory requirements and construction standards for known oil well locations. As described further in Master Response 11 – Hazards and Hazardous Materials pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

*Comment WB-41*

The comment expresses concern that the Redondo Beach Local Hazard Mitigation Plan was not considered in the analysis presented in Section 3.8, *Hazards and Hazardous Materials*. As

described in Section 3.8.2, *Regulatory Setting*, the LACoFD Health Hazardous Materials Division and RBFD work together to implement the Redondo Beach Local Hazard Mitigation Plan that addresses the City's planned response to emergencies. Section 3.8.2, *Regulatory Setting* has been updated to include further discussion of the Redondo Beach Local Hazard Mitigation Plan.

*Comment WB-42*

The comment claims that the proposed Project would require a zoning variance given that it would exceed the 0.5 FAR in the C-2 zoned parcel (Flagler Lot) and that the EIR should consider alternative to the proposed Project if findings for a variance cannot be made. Refer to the response to Comment WB-5.

*Comment WB-43*

The comment suggests including several policies from the Redondo Beach General Plan Noise Element in Section 3.11, *Noise*. Redondo Beach General Plan Noise Element Goal 10.4 and Policies 10.4.1 and 10.4.5; Policies 10.5.1 and 10.5.5; Goal 10.6 and Policies 10.6.1 and 10.6.2; and Goal 10.8 and Policy 10.8.1 have been added to Section 3.11.1, *Regulatory Setting*.

*Comment WB-44*

The comment requests the EIR include an analysis of operational noise impacts from the proposed electrical yard and gas yard areas. As previously described, the gas yard is an existing feature on the site and would not be affected by the proposed Project. As described in Master Response 12 – Noise Analysis, Section 3.11, *Noise* of the EIR has been revised to include discussion of the potential for operational noise impacts from the proposed substation.

*Comment WB-45*

The comment requests consideration of the potential for indirect impacts related to population increase associated with Redondo Beach dwelling units being vacated to move into the proposed Assisted Living units, which would free up dwelling units for the average 2.34 persons per household. This comment has been noted. The discussion in Impact PH-1 has been revised to clarify that even with the conservative assumption that all of the proposed 157 new Assisted Living units are occupied by Redondo Beach residents that currently live alone, and that all of their Redondo Beach residences are filled with new residents from outside of the Redondo Beach area at an average rate of 2.34 persons per household, the maximum population increase would be 367, which would still be less than 1 percent (i.e., 0.55 percent) of the Redondo Beach population.

*Comment WB-46*

The comment implies the EIR does not consider the potential conflict with access to Flagler Lane for BCHD employees and visitors. However, it should be noted that the driveways along Flagler Lane would not provide access to long-term parking on the BCHD campus and as such, would not be a primary entrance for BCHD employees and visitors. The primary entrances to the Project site would continue to be provided along North Prospect Avenue. Additionally, as noted in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives,* the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. As such, Section 5.0, *Alternatives* considers four alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane.

*Comment WB-47*

The comment recommends noting that the Construction Traffic and Access Management Plan required under MM T-2 would be subject to review and approval by the City of Torrance rather than the County Department of Transportation (DOT). Given that the proposed construction haul trucks would travel along regional highways, the Construction Traffic and Access Management Plan is subject to review and approval by County DOT. However, the City of Torrance Community Development Department has been added to the list of reviewers under MM T-2 given that the proposed construction haul routes would also travel through the City of Torrance.

*Comment WB-48*

The comment suggests that while MM T-2 states, that *"[t]rucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself,"* it should further state that *"[n]o truck queuing/staging shall occur on any public roadway in the vicinity of the Project site."* This comment has been noted. MM T-2 clearly states that truck queuing/staging would be allowed at approved locations only. MM T-2 further states that the required Construction Traffic and Access Management Plan would be subject to review and approval by the City of Redondo Beach Engineering Division, among other agencies. As previously described, BCHD is committed to working collaboratively with the City of Redondo Beach to develop a Construction Traffic and Access Management Plan that is suitable for approval.

*Comment WB-49*

The comment recommends including Redondo Beach General Plan Utilities Element Policy 6.1.10 to Section 3.15, *Utilities and Service Systems*. Objective 6.1 and Policy 6.1.10 have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-50*

The comment suggests adding Redondo Beach General Plan Land Use Element Policies 1.55.7-1.55-9 to Section 3.15, *Utilities and Service Systems*. As described in response to Comment WB-30, these policies have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-51*

The comment recommends including Redondo Beach General Plan Utilities Element Policies 6.1.5, 6.2.3, and 6.2.7 to Section 3.15, *Utilities and Service Systems*. This comment has been noted. Objective 6.2 and Policies 6.1.5, 6.2.3, and 6.2.7 have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-52*

The comment incorrectly claims that Impacts UT-3 and UT-4 do not address the potential for impacts on the City of Redondo Beach sewage collection system or the Los Angeles County Sanitation District (LACSD) transmission system. The increase in operational wastewater generation at the Project site and associated effects on the local sewer system and LACSD sewer lines resulting from implementation of the proposed Project are discussed under Impact UT-3. As described under Impact UT-3, the Sewer Capacity Study prepared for the proposed Project determined that the existing buildings on the Project site generate a peak daily demand of 68,925 gallons per day (gpd), which flows into the 8-inch local sewer main in North Prospect Avenue and away from the Project site to the southeast. The existing sewer main capacity is 668,593 gpd. Using wastewater generation factors from the City of Los Angeles CEQA Thresholds Guide (2006), Phase 1 of the proposed Project would decrease existing wastewater generation by approximately 6,319 gpd and Phase 2 of the proposed Project would increase the amount of wastewater currently transported by the sewer system by approximately 47,361 gpd from existing conditions.

To ensure that wastewater flows would be adequately accommodated, sewer lines are reviewed based on the guidelines for sewer design and operations from the Los Angeles Bureau of Engineering Manual – Part F. The Sewer Capacity Study concluded, even with the increase in sewage flow associated with the proposed Project, proposed flows would remain below a 50 percent flow depth to diameter ratio, and the existing 8-inch sewer line along Diamond Street

would adequately accommodate the proposed sewer flow without upgrades. Therefore, the proposed Project and would not exceed existing infrastructure capacity.

The EIR further describes in Impact UT-3 that the proposed Project wastewater would continue to flow from the local sewer line along Diamond Street to the LACSD South Bay Cities Main Trunk Sewer, located in Gertruda Avenue at Catalina Avenue. The LACSD's 20-inch diameter lined trunk sewer has a capacity of 2.4 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2015. As such, the LACSD main trunk sewer has a remaining sewer capacity of approximately 2.1 mgd and the increase in sewage flow of 0.047 mgd associated with the proposed Project would not exceed the LACSD sewer capacity. Therefore, implementation of the proposed Project would result in a less than significant impact on existing wastewater infrastructure. Please refer to Impact UT-3 in Section 3.15, *Utilities and Service Systems* for a full discussion of the potential for impacts on the City of Redondo Beach sewage collection system or the LACSD transmission system.

*Comment WB-53*

The comment criticizes the discussion of the possibility of rezoning for mixed-use or multi-family under Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus since a number of uses could be requested and serve different purposes. Under Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of theses existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment of uses permitted under the P-CF zone district of those that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus discusses a range of potential development scenarios, including uses permitted under the P-CF and C-2 zones, uses that would be permitted with a CUP, and uses that could be permitted with a zoning change. Therefore, the discussion of Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus discusses the possibility of a number of different uses of the site.

*Comment WB-54*

The comment notes that Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

### 9.3.2 Non-Governmental Organizations

**Letter MC**

June 8, 2021
Marcia Cook, Chair
Sierra Club Palos Verdes / South Bay Group

*Comment MC-1*

The comment questions why photovoltaic solar panels are proposed for only 25 to 50 percent of the rooftop area. Installation of photovoltaic solar panels across 25 to 50 percent of the proposed Project's rooftop area would result in substantial solar capacity of the Beach Cities Health District (BCHD) campus. Although these comments do not address the adequacy of the EIR, as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment MC-2*

The comment describes that the proposed Project would result in approximately 5 years of construction during which construction activities would have the potential to affect nearby sensitive receptors. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion of how the EIR considers and addresses potential air quality impacts to sensitive receptors.

The comment goes on to inquire how the use of Tier 4 engines will be enforced during construction. As described in Mitigation Measure (MM) AQ-1, BCHD would be required to prepare and Air Quality Management Plan for Project construction, which require the use of U.S. Environmental Protection Agency (USEPA) Tier 4 engines, among other fugitive dust control and air quality management measures. CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified it Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority

as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

*Comment MC-3*

The comment inquires who will enforce the California Idling Regulations onsite during construction. As described in Section 3.2.2, *Regulatory Setting*, the California Air Resources Board (CARB) has also established California Idling Regulations that restrict the idling of heavy-duty vehicles. In particular, the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling requires, among other things, that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle's primary diesel engine longer than 5 minutes at any location. These regulations are codified in Title 13 California Code of Regulations (CCR) Section 2485, and may be enforced by the Air Resources Board; peace officers as defined in California Penal Code, Title 3, Chapter 4.5, Sections 830 et seq. and their respective law enforcement agencies' authorized representatives; and air pollution control or air quality management districts. Any person who violates any requirement of this section is subject to the penalties set forth in Health & Safety Code (H&SC) Sections 39674, 39675, 42400, 42400.1, 42400.2, 42400.3, 42402, 42402.1, 42402.2, 42402.3, 42402.4, 42403.5, and 42410 and 43704.

*Comment MC-4*

The comment claims that wind can increase without warning and contractors are typically not willing to stop work quickly, implying that there is a lack of enforcement for MM AQ-1, which would prohibit demolition when wind speed is greater than 25 miles per hour (mph). Refer to the individual responses to Comments MC-2 and MC-3 for a description of implementation and enforcement responsibilities, which are also outlined Section 11.0, *Mitigation, Monitoring, and Reporting Program*.

The comment goes on to state that the dust control measures would require a lot of water and that the EIR should provide methods to reduce water use while still mitigating dust and particulate matter migration. However, it should be noted that MM AQ-1 already provides several measures for dust control that do not require the use of water, such as quick replacement of ground cover in disturbed areas, covering all stock piles with tarp, limiting traffic to 15 mph or less on unpaved

roads, prohibiting demolition when wind speed is greater than 25 mph, and sweeping streets adjacent to the Project site at the end of the day if visible soil material is carried over to adjacent roads.

*Comment MC-6*

The comment contends that the known contamination on-site could result in health impacts that have not been addressed. While the comment correctly states that construction activities associated with the proposed Project would disturb soils contaminated with tetrachloroethylene (PCE), the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, *Hazards and Hazardous Materials*). The implementation of MM HAZ-2a through -2d would ensure that PCE and the other identified volatile organic compounds (VOCs) are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through -2d impacts would be less than significant.

*Comment MC-7*

The comment states that the use of soil vapor extraction (SVE) equipment, particularly the blowers prescribed in MM HAZ-2c, should be equipped with activated charcoal filters or other treatment to avoid blowing unhealth concentrations of VOCs into the air and expose people downwind to these vapors. As described in MM HAZ-2b and -2c, the use of SVE equipment would be used only in the event that the OSHA exposure limits for PCE and other VOCs are exceeded and would only be used for work within confined space. Given that this equipment would be used in confined spaces, use of this equipment would not result in substantial downwind vapors of VOCs. However, carbon filters are described as a part of the proposed foundation design for the proposed development on the BCHD campus.

*Comment MC-8*

The comment states that MM HAZ-2c refers to PCE as trichloroethylene instead of tetrachloroethylene. MM HAZ-2c has been revised to abbreviate PCE for tetrachloroethylene.

*Comment MC-9*

The comment questions the EIR's findings regarding impacts on loss of mature trees and associated impacts on greenhouse gas (GHG) emissions and migratory birds, asserting that these

impacts should be considered significant. However, as thoroughly discussed in Section 3.3, *Biological Resources*, while the Project would result in the removal of approximately 20 landscaped trees along Flagler Lane, approximately 60 trees along the norther perimeter of the campus, and approximately 20 landscaped trees along Diamond Street. The Phase 2 development program would also require the removal of additional landscaped trees and shrubs within the interior portions of the existing campus. Despite the removal of these trees, the proposed Project's landscaping plan would replace trees and shrubs with new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal Code (RBMC) Section 10-2.1900, and proposed tree removal and landscaping along Flagler Lane would be conducted consistent with the Torrance Street Tree Master Plan. The proposed landscaping – including large landscaped trees and shade trees that are adapted to the climate of Southern California – would provide enhanced roosting or nesting habitat for resident and migratory birds. In addition, the implementation of MM BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged (i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation. Additionally, as described in Table 3.7-7 in Section 3.7, G*reenhouse Gas Emissions and Climate Change*, the proposed Project would result in a reduction of 741.7 metric tons of carbon dioxide equivalent (MT $CO_2e$) per year. As such, contrary to the commenter's assertion, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

*Comment MC-10*

The comment describes that the use of local native plant species rather than drought-tolerant plants from other parts of the world would increase habitat value for wildlife. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees consistent with the existing landscaping on-site and in the vicinity (refer to Figure 2-9). As described in the response to Comment MC-9, the plantings would be consistent with RBMC Section 10-2.1900 as well as the Torrance Street Tree Master Plan, where applicable within the City of Torrance right-of-way.

*Comment MC-11*

The comment recommends minimizing the use of natural gas by using heat pump heating, ventilation, and air conditioning (HVAC) and heat pump water heating to back up solar water heating. The overall estimated net increase in natural gas demand following the completion of Phase 2 of the proposed Project would be 2,546,779 thousand British thermal units (kBTU) (25,475 therms) per year, which corresponds with approximately 0.2 percent of natural gas consumption in Redondo Beach in 2012. As described in Section 3.5, *Energy*, the estimated energy demand is conservative in that it does not account for the sustainability features described for the proposed Project including photovoltaic solar panels, solar hot water systems, high efficiency HVAC systems, etc. (refer to Section 2.5.1.5, *Sustainability Features*).

*Comment MC-12*

The comment claims that the proposed Project would result in significant GHG emissions given the projected transportation fuel consumption provided in Table 3.5-6. As shown in Table 3.5-6, the total fuel consumption associated with construction equipment and construction vehicle trips would represent a very small fraction – less than 1 percent – of the County's total 2018 fuel consumption and would not result in a substantial increase in fuel consumption. The total fuel consumption associated with the proposed Project would be comparable with similarly sized construction projects in the South Bay. As described in Table 3.7-7 in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, the proposed Project would result in a reduction of 741.7 MT $CO_2e$ per year. As such, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

*Comment MC-13*

The comment suggests that the proposed Project include measures to ensure California and Redondo Beach will meet the 1990 GHG emissions levels target by 2020. The proposed Project includes several measures and design features to reduce energy demand, water demand, and vehicle miles traveled (VMT), all of which would reduce GHG emissions. As described in Section 2.5.1.5, *Sustainability Features*, it should be noted that all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed Residential Care for the Elderly (RCFE) Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

- Photovoltaic solar panels occupying approximately 25-50 percent of the roof area;

- Solar hot water system to reduce energy use;
- Energy efficient heating, ventilation, and air conditioning (HVAC) systems;
- Operable windows for natural ventilation;
- High-performance building envelope – including thermal insulation;
- Controlled natural lighting and lighting systems designed with occupancy sensors and dimmers to minimize energy use;
- Water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.); and
- Interior materials with low VOC content;
- Plant palette comprised of species adapted to the climate of Southern California;
- High efficiency irrigation system; and
- Pervious paving to promote on-site stormwater infiltration.

The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; electric vehicle (EV) charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. The proposed Project would also implement a Transportation Demand Management (TDM) plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site and overall traffic on the surrounding street network. The TDM plan would include transit and carpool incentives for employees.

The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification. LEED is a national certification system developed by the U.S. Green Building Council (USGBC) to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. The program promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

The proposed new buildings would also be WELL Building Certified. The WELL Building Standard is the premier standard for buildings, interior spaces and communities seeking to implement, validate and measure features that support and advance human health and wellness. WELL was developed by integrating scientific and medical research and literature on

environmental health, behavioral factors, health outcomes and demographic risk factors that affect health with leading practices in building design, construction, and management.

It should be noted that the EIR identifies less than significant impacts associated with GHG emissions. The proposed Project complies with Connect SoCal, the Redondo Beach and Torrance General Plans and Climate Action Plans, the RBMC, the Torrance Municipal Code (TMC), Assembly Bill (AB) 32, and SB 32, and thus would ensure that the GHG emissions associated with the proposed Project would conform with State and local requirements (refer to Tables 3.7-8 through 3.7-10). As previously described, the proposed Project would result in a reduction of 741.7 MT $CO_2e$ per year. As such, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

*Comment MC-14*

The comment states that the EIR does not provide an easily findable link for the public to read the Phase I and Phase II Environmental Site Assessment reports. These reports are provided in Appendix G of the EIR. Additionally, they are also available on the BCHD website here: https://www.bchdcampus.org/campus.

*Comment MC-15*

The comment states that the EIR is required to analyze a *"Do Nothing"* alternative, which would mean leaving all of the existing buildings and grounds in place as they are. For context, pursuant to CEQA Guidelines Section 15126.6(e)(1), *"[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project."* Pursuant to CEQA Guidelines Section 15126.6(e)(2), *"[t]he 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."*

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD

would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is "*reasonably expected to occur in the foreseeable future"* clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

*Comment MC-16*

The comment states that the best course of action would be to remodel the existing buildings on the campus rather than redevelop the campus. However, as discussed in detail within Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, upgrade of the Beach Cities Health Center would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. The financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. Therefore, this alternative would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD, and was discarded from further consideration. This discussion provides sufficient information and explanation as to why this alternative would not generate enough

financial resources necessary to meet the basic objectives of the Project. The CEQA Guidelines Section 15126.6(c) states that:

> *"The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."*

Further, State CEQA Guidelines Section 15126.6(d) states that:

> *"The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project... If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."*

The discussion of the Upgrade the Beach Cities Health Center (No Seismic Retrofit) alternative provides sufficient information regarding the factors considered in the analysis of this alternative, primarily failure of the alternative to meet most of the basic project objectives and financial infeasibility, and the determination to dismiss the alternative from further analysis.

The comment further asserts that a complete analysis should be performed for both a *"Remodel"* and *"Remodel to Include Retrofit"* alternative, and states that the No Project Alternative analysis needs to be revised so that it is not a demolition, but instead a remodel of the existing buildings. However, as previously described in the response to Comment MC-15, the EIR sufficiently describes the reasonably foreseeable actions that would be implemented under a No Project Alternative, and need not include additional or revised discussion of an alternative that considers solely the remodel of existing buildings. Consideration and discussion of project alternatives in an EIR is governed by CEQA Guidelines Section 15126.6, which states *"[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen*

*any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation."*

### 9.3.3 Neighborhood Organizations

**Letter TRAO**

June 1, 2021
Torrance Redondo Against Overdevelopment

*Comment TRAO-1*

The commenter provides a roadmap summarizing the intent of the comments, appendices, attachments, and references. The commenter also provides a general summary of conclusions, which are responded to in the responses to comments below. However, it must be noted that the assertions contained in this summary roadmap comment are often unsupported opinion statements with no substantial evidence provided in the record to support such assertions. Such unsupported assertions absent facts and detailed analysis do not constitute substantial information in the record as defined in California Environmental Quality Act (CEQA) Guidelines Section 15384. For example, as described in the responses to individual comments below, the proposed Healthy Living Campus Master Plan is legal and the role of the Beach Cities Health District (BCHD) as lead agency fully complies with the requirements of CEQA. Similarly, the assertion that the project objectives are misleading and serve only BCHD's wants rather than the public needs is unsupported opinion and ignores the nearly 70-year long history of BCHD serving public health needs in the Beach Cities and the nearby South Bay communities. BCHD carefully considered the development of the project objectives in light of its mission to provide community-based health and wellness services and formulated these project objectives after extensive internal discussions, open sessions of the BCHD Board of Directors, and discussions during five different public scoping meetings. In addition, stated opinions many of the mitigation measures do not sufficiently protect the public are also unsupported by technical analysis and ignore the fact that these measures were crafted by technical experts with substantial expertise in their relevant fields overseen by a CEQA Project Management Team with decades of experience producing more than 60 Environmental Impact Reports (EIRs) for jurisdictions throughout Southern California and Central California. Finally, without providing substantial evidence or analysis, the comment asserts that applicable plans, alternatives, and cumulative effects are not evaluated at sufficient depth and that many environmental issue areas in CEQA Appendix G have not been adequately addressed.

However, as set forth in the responses to the individual comments below, the EIR exhaustively addresses each of these environmental issue area, providing detailed analysis supported by technical studies, where appropriate.

*Comment TRAO-2*

The comment describes the Torrance Redondo Against Overdevelopment (TRAO) organization as well as some of its recent activities as they relate to the proposed Healthy Living Campus Master Plan. BCHD acknowledges this summary.

*Comment TRAO-3*

The comment incorrectly asserts that the City of Redondo Beach is the only entity that is viable as a lead agency. As described in Master Response 2 – BCHD as Lead Agency, CEQA Guidelines Sections 15050-15053 govern how the lead agency is determined. Pursuant to CEQA Guidelines Section 15051:

> *"Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:*
>
> *(a) If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency."*

Although the Project site is located in the City of Redondo Beach, the proposed Healthy Living Campus Master Plan would be approved and implemented, hence, carried out, by BCHD. For example, BCHD would enter into agreements to demolish the existing buildings, construct the new buildings and associated improvements, and operate the new health and fitness facilities. The only other agencies that would grant discretionary approvals for the proposed Project are the City of Redondo Beach (Design Review and Conditional Use Permit [CUP]), and possibly the City of Torrance (related to limited activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way). State licenses would also be needed to operate some of the facilities. The CEQA Guidelines anticipate that this will often be the case, however, which is why the role of the responsible agency, which applies to these agencies, was created and is defined in CEQA Guidelines (CEQA Guidelines Section 15096 and 15381). Therefore, assertions that the Project is somehow illegal and that BCHD is not the lead agency are without legal basis and are unsupported by the basic facts surrounding the proposed Project.

*Comment TRAO-4*

The comment asserts that the proposed Healthy Living Campus Master Plan violates the City of Redondo Beach Municipal Code (RBMC) and the City of Torrance Municipal Code (TMC).

The comment claims that the EIR ignores the Torrance Hillside Overlay Zone. However, as described in Section 2.0, *Project Description*, the EIR discloses and acknowledges that *"[t]he Torrance Property Zoning Map also identifies these Flagler Lane and Flagler Alley within the Hillside Overlay, which generally extends along the western border of Torrance."* Additionally, the Hillside Overlay Zone is depicted in Figure 3.10-2. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way, which are relatively minor components of the proposed Project, would require permits issued by the City of Torrance. However, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the BCHD campus beyond the municipal boundaries. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are thoroughly addressed in Section 3.10-5. Final determination of consistency with individual policies will be the responsibility of the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. Nevertheless, as required under CEQA, the EIR discloses and discusses potential consistency with such policies for consideration by City decision-makers and staff.

The comment also asserts that the proposed Healthy Living Campus Master Plan would result in illegal access to streets within the City of Torrance. The proposed Project includes two access points with driveways along Flagler Lane. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed for a subterranean service area and loading dock entry/exit. Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, which is designated as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether. The EIR serves as an informational document that provides both lead and responsible agencies with detailed impact analysis and assessment of consistency with adopted plans and policies for consideration during permitting.

Finally, the comment incorrectly asserts that the City of Redondo Beach Measure DD would require a public vote on the proposed Health Living Campus. Measure DD, which was approved in 2008, requires a public votes for any zoning changes. The proposed Project would not require a zoning change. As described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, the existing campus is designated as P (Public or Institutional) by the Redondo Beach General Plan and zoned as P-CF (Community Facility) under the Redondo Beach Zoning Ordinance. The P designation applies to lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. Specific purposes of the P designation provides lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost community health and wellness services and programs to Beach Cities residents as well as other nearby South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Further, under RBMC Section 10-2.1110, medical offices, health-related facilities, and residential care facilities are permitted on P-CF zones with a CUP. A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Memory Care. The proposed Project – like other improvements made on the campus in the past – would require a CUP under existing code, with the City of Redondo Beach acting as a responsible agency after consideration of the proposed Project by the BCHD Board of Directors. As described in RBMC Section 10-2.1116 the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project would not conflict with any P-CF zoning code requirements.

*Comment TRAO-5*

The comment claims that BCHD has taken a number of actions and incorrectly asserts that this is evidence of approval of the proposed Health Living Campus Master Plan and that the EIR should be withdrawn. However, BCHD has not taken any action(s) to approve the proposed Project. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to prepare the description of a proposed Project for

analysis in the EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus in order to develop the project description to a sufficient level of detail for impact analysis (e.g., trip generation calculations). It should also be noted that where required these actions have been conducted in open manner by the BCHD Board of Directors, at multiple well-noticed public hearings.

*Comment TRAO-6*

The comment asserts that the project objectives related to seismic safety are misleading and asserts that these objectives are self-serving and prey upon the public's fear of earthquakes. However, this assertion is unsupported by facts and the public record. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

*Comment TRAO-7*

The comment asserts that the cost of retrofitting the existing Beach Cities Health Center is not as expensive as claimed. As described in Master Response 6 – Financial Feasibility/Assurances, while CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to do so if the information *"does not supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

For clarity, it should be noted that the elimination of seismic hazards is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As

described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD community health and wellness services to both Beach City residents and many residents throughout the South Bay. However, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. The combined cost of renovation and seismic retrofit would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. This issue is also discussed in Section 5.0, *Alternatives* as a part of the rationale for the development of Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) as well as Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus.

*Comment TRAO-8*

The comment asserts that BCHD discriminates between occupants of the Beach Cities Health Center and the two other medical office buildings. Further, it claims that this is to improve the creature comforts for the BCHD staff who work in it. This comment is wholly unsupported by factual evidence and further does not address the adequacy of the EIR or any physical environmental issues as required by CEQA.

Nevertheless, as described in Master Response 3 – Project Need and Benefit, Nabih Youssef Associates conducted a seismic assessment that found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue) and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). This *Beach Cities Health District Seismic Assessment* is referenced in the EIR and is publicly available at: https://www.bchdcampus.org/sites/default/files/archive-files/January-2018-Nabih-Youssef-and-Associates-Presentation_CWG.pdf. As described in the seismic assessment and as summarized in Section 3.6, *Geology and Soils*, *"[t]he Beach Cities Health Center, formerly the South Bay Hospital, is a 60-year-old, non-ductile concrete building. The original 4-story (north) tower was constructed in 1958 and the 4-story addition (south tower) was constructed in 1967. Both of these*

*towers were constructed with non-ductile concrete roofs, floors, and poorly reinforced columns, making them susceptible to collapse in the event of an earthquake."*

Construction has been phased as proposed because the more substantial geotechnical issues were identified in the 4-story Beach Cities Health Center, which is nearly a decade older and more susceptible to future structural stability issues in the event of an earthquake than the Beach Cities Advanced Imagining Building. In addition, the Beach Cities Health Center includes Memory Care units that are occupied 24 hours per day which means that the occupants of that building are more susceptible to risk because they living in the building. The assertion that the proposed Project phasing is strictly intended to improve the creature comforts for the BCHD staff who work in it is unfounded and unsupported by substantial evidence.

*Comment TRAO-9*

This comment, without providing substantial evidence, restates the assertion that the proposed Project is an indefinite, uncertain, and speculative way to solve a seismic problem and states the need for a seismic retrofit is a BCHD management want. Refer to the response to Comment TRAO-7. It is important to note that CEQA Guidelines Section 15124 requires that *"the statement of objectives should include the underlying purpose of the project and may discuss project benefits."* There is substantial evidence that the project objective addresses the underlying purpose of the project. The commenter's disagreement with the project objectives is a comment on the project, not on the adequacy of the environmental analysis in the EIR. Also, as previously described, the project objective to eliminate seismic safety issues is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, *Project Description*, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. In addition, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies.

*Comment TRAO-10*

The comment implies that the underlying objective of the proposed Project is for BCHD to generate revenue to stay in business. The comment also offers claims that previously presented polling data have been biased and that the need for the community health and wellness services provided by BCHD is overstated. However, these comments are unsubstantiated opinion that does not reflect the public record of BCHD's work on the proposed Project nor the evidence presented

in multiple technical studies and discussed in several open public hearings before the BCHD Board of Directors.

Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD community health and wellness services for both residents of the Beach Cities living and many interested residents from the South Bay. As such, the proposed development must replace revenue to support the current level of existing community health and wellness programs and services as well as generate new revenues to fund the growing future community needs. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. CEQA does not require a quantification of the value that BCHD provides to the community within the EIR, although such value is apparent in the range of programs and services provided and the existing public use of these program services by tens of thousands of residents. A quantitative analysis of BCHD's services can be found in the Community Health Report (https://www.bchd.org/healthreport) as well as the Priority-Based Annual Budgets (https://www.bchd.org/operating-budgets).

*Comment TRAO-11*

This comment asserts that BCHD overstates the collaboration and the incorporation of input gathered as a part of the Community Working Group (CWG) formed by BCHD. This comment does not relate to the adequacy of the environmental review in the EIR. As stated in CEQA Guidelines Section 15204, *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* However, BCHD has gone to relatively extraordinary lengths to gather community input and address concerns, holding numerous public workshops and hearings over the last 5 or more years to discuss the Project. The formation of the CWG is discussed in Section 1.6, *Project Background* , which describes the history associated with the proposed Project and provides a brief summary of the competing community concerns that were considered during the development of

the proposed Healthy Living Campus Master Plan. Section 1.6, *Project Background* and Table 1-1 accurately summarize the 17 CWG meetings that were held to discuss various components of the proposed Healthy Living Campus Master Plan during its tenure. The CWG was dissolved in December 2020 following the conclusion of the preliminary planning and design phases. BCHD staff also conducted public outreach for the Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan, as well as holding five scoping meetings, an unusually high number. The analysis of physical environmental impacts provided in the EIR does not rely on any of the polling questions or data identified in the comment.

*Comment TRAO-12*

This comment restates that supporting the current level of services is a BCHD want and not a public need. Refer to the response to Comment TRAO-10 as well as Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue.

*Comment TRAO-13*

The comment asserts that BCHD has overstated the need for an Assisted Living program in the Beach Cities, but represents an unsupported assertion, not based on expert opinion or corroborating technical studies. As described in Master Response 6 – Financial Feasibility/Assurance, BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. Field work and analysis were originally completed in April 2016 and updated in August 2018 and May 2019 to reflect the changed number of proposed housing units. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 updated market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. The assertion that there is not a demand for Assisted Living in the Beach Cities is unfounded and clearly refuted by these technical studies prepared by firms with recognized expertise.

The comment also suggests that BCHD consider the implementation of a village movement philosophy, where neighborhood organization are formed and homeowners pay yearly dues to hire

a small staff for in-home help. It should be noted that the proposed Project would provide a Program of All-Inclusive Care for the Elderly (PACE). As described in Section 2.5.1.1, *Proposed Uses,* PACE is a Medicare and Medicaid program that provides comprehensive medical and social services older adults (i.e., age 55 and older with an average age of 76), which permits and assists seniors remaining in their own homes. PACE services would be focused on services provided at an adult day health center, but would also include home health care visits and delivery services. Such services would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.), thereby coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. For most participants, PACE services would enable them to remain in their homes in the community rather than receive care in a nursing home or other elder care facility.

*Comment TRAO-14*

The comment suggests that the demolition of the Beach Cities Health Center is not required to create open space and further asserts that the open space would not be publicly accessible because it would be both privately owned by an investment company and would be popular with the homeless. However, the proposed open spaces and major walkways would be open to public access, with security features to enable access while controlling use. While the northern surface parking lot is currently paved and could conceivably be converted into a smaller open space, it is located on an elevated area of the campus behind the Redondo Village Shopping Center. If converted into open space, this area would relatively hidden from the existing public realm (e.g., sidewalks in the vicinity) and neither be readily accessible by the public nor well integrated as a part of a larger campus environment. As described in Section 2.5.1.1, *Proposed Uses* the proposed Project would substantially expand open space on the existing campus, including 114,830 square feet (sf) of programmable open space within the interior of the Project site. The central lawn would be sized to accommodate a variety of outdoor community events such as movie nights or group fitness activities. The open space would not be privately owned or cordoned off for security purposes as the comment asserts. As described in Section 2.0, *Project Description*, security features would be limited to access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas. The design of the proposed development would also minimize dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances,

pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of RBMC Section 10-5.1706(c)(10).

*Comment TRAO-15*

The comment claims that the Phase 2 development program is unstable. It is not entirely clear what the commenter means by this comment; however, as described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, the Phase 2 development program is fully described in the EIR at a programmatic level. Section 2.5.2, *Phase 2 Development Program*, describes that the long range development program under Phase 2 would include the development of space for a Wellness Pavilion, an Aquatics Center, and a new Center for Health and Fitness (CHF), which would be relocated back on the campus. Additionally, the Phase 2 development program would include the construction of a parking structure with up to 2 subterranean levels and up to 8.5 above ground levels. The final locations within the Phase 2 footprint and the final sizes of the facilities necessary to support the programmed uses have not yet been finalized; however, the maximum sizes and location of Phase 2 have been described. Due to uncertainties in future health and wellness programming, trade-offs associated with site planning and design, and financing considerations, Phase 2 can only be programmatically described at this time. It is anticipated that final selection of a detailed site development plan for Phase 2 would be based on the considerations discussed in Section 2.5.2.2, *Physical Design Considerations and Priority-based Budgeting*, but would not occur until after the completion of Phase 1.

This is clearly in keeping with the requirements of CEQA Guidelines Section 15165:

> *"Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect."*

As described in further Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA

Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment TRAO-16*

The comment states that parklands should be developed in lieu of an aquatics center, parking towers, a new CHF, and a wellness pavilion. It is important to note that the proposed open space would be developed in Phase 1. The development of the proposed Aquatics Center, CHF, and Wellness Pavilion would not encroach on or otherwise limit the use of this open space. Further, it should be noted that this comment represents the commenter's opinion regarding design of the proposed Project and does not pertain to the adequacy of the EIR.

*Comment TRAO-17*

The comment claims that the impacts to scenic views are a distraction and incorrectly asserts that Mitigation Measure (MM) VIS-1 is the entire justification that all aesthetic impacts would be less than significant. The comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2. The impact to scenic views, which is the subject of the comment, would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190$^{th}$ Street & Flagler Lane. MM VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Comment TRAO-18*

This comment asserts that the street view of the proposed RCFE Building from Beryl Street is massive and does not belong in a residential neighborhood. While the comment provides a rendering of the proposed Project, which appears to be a marked up version of Representative View 4, the comment does not challenge any specific aspects of the analysis of scenic vistas presented under Impact VIS-1 or visual character presented under Impact VIS-2, but rather states the commenter's opinion. Aside from the subjective contention that the proposed RCFE Building would be out of place, the comment does not contest the consistency of the proposed Project with the City of Redondo Beach policies and development standards, which, consistent with CEQA requirements, are the thresholds for the analysis of impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*). Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Comment TRAO-19*

The comment presents the before and after photosimulations of the proposed Project from Representative View 2 and Representative View 3, both of which were presented in the EIR. The comment asserts that these photosimulations illustrate how profoundly the surrounding neighborhoods are impacted by the proposed design and claim that the proposed Project is not compatible with the surrounding neighborhood. The EIR thoroughly describes and depicts the proposed Project using computer-generated photosimulations prepared by licensed architects with the analysis describing potential visual changes in depth, as well as providing detailed mitigation measures, where required.

The comment cities Redondo Beach General Plan Land Use Element Policy 1.46.4: *"Establish standards for the City and coordinate with other public agencies to ensure that public buildings and sites are designed to be compatible in scale, mass, character, and architecture with the existing buildings and pertinent design characteristics prescribed by this Plan for the district or neighborhood in which they are located."* However, aside from the subjective contention that the proposed RCFE Building is not compatible, the comment does not challenge any specific aspect of the analysis provided within Table 3.1-2, which contains a comprehensive analysis of policy consistency, including the consistency of the proposed Project with Policy 1.46.4. The proposed Project also would be subject to Planning Commission Design Review consistent with the requirements for development in a parcel zoned P-CF. While the proposed Project would increase the maximum total height of new development compared to existing buildings on the Project site, the proposed development under Phase 1 and Phase 2 would be designed using siting, planning,

and architectural design to reduce visual bulk and create compatibility with surrounding low-rise development in the vicinity.

With respect to Torrance General Plan Land Use Element Policy LU.2.1, LU.2.2, and LU.3.1, each of these policies is addressed in detail in Table 3.1-3. As described therein, development within the City of Torrance right-of-way would be ancillary to the proposed Project and limited to the proposed pick-up/drop-off loading zone exit as well as the entry/exit for the subterranean service area and loading dock. The subterranean service entrance would require the construction of retaining walls, similar in height to existing retain walls, but which would include substantial new landscaping. These features would require a grading and building permit from the City of Torrance. Additionally, the proposed Project would re-landscape the eastern portion of the campus to be consistent with the proposed landscape within the remainder of the campus, substantially increasing the coverage of landscaping in this area, including shade trees that would help buffer the proposed Project from surrounding areas. This proposed construction of retaining walls, a paved driveway, and landscaping would not be incompatible with the Torrance neighborhood to the east, particularly given that the existing slope is already characterized by a series of wooden retaining walls that are maintaining the slope, with numerous mature trees but minimal understory landscaping. The landscaping would serve to help screen and soften the view of the proposed RCFE Building. It should also be noted that the RCFE Building has been sited along the northern perimeter of the Project site in an effort to minimize the potential visual effects on the single-family neighborhood to the east within the City of Torrance. Again, the comment merely cites these policies, but does not challenge any specific aspect of this analysis provided within Table 3.1-3 or provide any substantial evidence in the record or detailed analysis regarding this issue.

*Comment TRAO-20*

The comment claims, without any substantial evidence, that that the representative views that were assessed in the Draft EIR were selected because they were the more innocuous ones of surrounding locations and that the additional analysis of views from:

- The Tomlee cul-de-sac from homes located directly East and just 80 feet from the site
- The Towers Elementary School playground entrance.

However, the CEQA Project Management Team expended considerable effort to select appropriate representative view locations that provided the most open views from public locations surrounding the Project site. As described in Section 3.2, *Aesthetics and Visual Resources*, six views were used to provide representative locations from which the Project site would be most visible from public streets, sidewalks, and recreational resources within the vicinity of the Project site. These six

representative views, which were identified with input from the City of Redondo Beach, encircle the campus and provide west, southwest, south, and northeast facing views of the Project site (refer to Figure 3.1-1). Representative Views 2, 3, and 5 in particular provide views of the Project site from a distance of less than 100 feet that are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter's assertion that these views used in the analysis of visual impacts are innocuous locations or that the height of proposed development is underrepresented.

With regard to the requested analysis of additional views, the EIR already includes comprehensive analysis of this issue and provides detailed computer-generated photosimulations from the locations from which the proposed Project would be most visible. It should also be noted that CEQA Guidelines Section 15204 clearly states: "*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."* As previously described, the six representative views offer a range of public views from public streets, sidewalks, and recreational resources within the vicinity of the Project site. For example, Representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represents views of the Project site from the residential neighborhood adjacent to the east of the Project site within the City of Torrance. Representative View 2 provides an unobstructed view of the BCHD visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street. An additional representative view the Tomlee cul-de-sac would not show any additional impact that would be materially different from the impacts described from Representative View 1 or Representative View 2. The same is true for the suggested view from the Towers Elementary School playground entrance.

Lastly, it should be noted that CEQA case law has established that only public views, not private views, need be analyzed under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah (1991)* 2 Cal. App. 4th 720, the court determined that "*we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in Topanga Beach Renters Assn. v. Department of General Services (1976) 58 Cal. App. 3d 188, '[all] government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general*." Similarly, in Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal. App. 4th 477, the court upheld an EIR's determination that impacts on public views would be significant, but impacts on private views were not significant. Additionally, in 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views – including the views from homes as requested by

the comment – are not considered under CEQA (California Public Resources Code Section 21082.2).

*Comment TRAO-21*

The comment incorrectly claims that not a single rendering or visualization of Phase 2 aesthetic impacts are shown and incorrectly states that the analysis of the Phase 2 development program is limited to an assessment of shade and shadow analysis.

Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program. As described therein, a program EIR generally analyzes a project for which less specific detail is currently known, but would be developed at a later date.

The visual impact analysis relies on the best available information for the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the proposed Phase 1 site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which are used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment TRAO-22*

The comment claims, without providing substantial evidence or analysis, that statements in the EIR are incorrect and unverified and cites a description of the views from Sunnyglen Park being blocked by intervening structures. The comment provides a photograph from Sunnyglen Park that appears to show the existing development on the campus above an existing 2-story residence. While the photograph does not include an accompanying location map or otherwise identify the location, during the preparation of these responses to comments efforts were made to identify the location from which the photograph was taken, which appears to be at or near the intersection of Norton Street & Redbeam Avenue. Contrary to the comment, based on a review of street level photography, the view in this location does in fact appear to be blocked by existing 1- to 2-story residential structures and associated landscaping. Nevertheless, the description in the Final EIR has been revised to state that *"views of the existing campus from Sunnyglen Park are partially or completely blocked in some locations (e.g., at the northwest corner of the park) by intervening 1- to 2-story single family residences and neighborhood serving commercial development."* However, the inclusion of multiple views from similar public places adequately depicts changes in public views, where the proposed development interrupts open sky views above existing structures.

As stated in CEQA Guidelines 15003(i), *"CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. A court does not pass upon the correctness of an EIR's environmental conclusions, but only determines if the EIR is sufficient as an informational document. (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692)."* Given the selection of the adjacent Dominguez Park as a representative view location for the development of photosimulations, the EIR clearly meets the standard for a good-faith disclosure of potential impacts to views from public places.

*Comment TRAO-23*

The commenter restates the claim that the aesthetics analysis is deficient and must be revised provide additional before-and-after visualizations and include the Phase 2 development program. The comment again asserts the commenter's opinion that the proposed Project is out of place in a residential neighborhood. As noted in this response, the EIR analysis of aesthetic and visual resource impacts is extensive and based on renderings developed by Paul Murdoch Architects under direction of the experienced CEQA Project Management Team, while the comments express the commenter's opinion unsupported by detailed analysis of technical studies. For issues related to the location and number of representative views refer to the response to Comment TRAO-20. For issues regarding visual character and neighborhood compatibility refer to the response to

Comment TRAO-19. Refer also to Master Comment Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and neighborhood compatibility. For issues related to the programmatic analysis of Phase 2, refer to the response to Comment TRAO-21 as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis.

*Comment TRAO-24*

The comment incorrectly claims that the air quality analysis uses average emissions rather than peak emissions. Section 3.2.3.2, *Methodology* very clearly states that the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod) calculates the peak day construction emissions by calculating emissions from overlapping construction activities. Peak daily construction emissions represent the potential worst-case maximum daily emissions of a construction day, and do not represent the emissions that would typically occur during every day of construction associated with the proposed Project. The estimated maximum daily construction emissions are then compared to SCAQMD's mass daily significance thresholds to identify any exceedances of thresholds, which could result in a potentially significant impact.

As described under Impact AQ-2 in Section 3.2, *Air Quality*, peak daily criteria pollutant emission were calculated for each phase of construction. This exhaustive modeling effort determined that unmitigated localized construction emissions from the proposed Project would exceed SCAQMD's localized significance thresholds (LSTs) for suspended particulate matter ($PM_{10}$) and fine particulate ($PM_{2.5}$). However, the EIR also found that implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 miles per hour (mph) which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD's LSTs. All analysis and assessment of mitigation effectiveness was conducted in accordance with SCAQMD's guidance and standards for such analyses. A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment TRAO-25*

The comment makes unreferenced and unsubstantiated inferences about the acceptance of construction impacts by society. The comment goes on to claim that BCHD must obey the

Hippocratic oath when assessing environmental impacts pursuant to CEQA. These comments are unfounded and do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. As noted in multiple responses above, BCHD has directed that the EIR comport with all CEQA requirements and has engaged in extensive public outreach beyond CEQA minimum requirements to ensure that all public comments are received and responded to, as appropriate.

It should be noted that all construction-related activities associated with the Phase 1 preliminary site development plan and the Phase 2 development program would comply with existing State and local regulations governing construction activities, including the RBMC and TMC. Additionally, the requirements of MM AQ-1, which go beyond the requirements of State and local regulations, would be implemented during construction to reduce impacts associated with $PM_{10}$ and $PM_{2.5}$ to a less than significant level. The MMRP in Section 11.0, *Mitigation Monitoring and Reporting Program* would be used to monitor and report on implementation of all adopted mitigation measures, and all implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment TRAO-26*

The comment makes unsubstantiated claims regarding the benefits of the proposed Project, the quality of life associated with the proposed Assisted Living program, and the affordability and potential occupancy rates of the Assisted Living units and Memory Care units. None of these comments address the technical adequacy of the air quality analysis in the EIR, which is based on exhaustive quantitative modeling to assess potential impacts associated with criteria air pollutant emissions and toxic air contaminants (TACs). In addition, refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the proposed benefits of the Project. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

*Comment TRAO-27*

This comment raises issues about $PM_{1.0}$ emissions and the potential effects on public health of local residents. The comment asserts that the EIR fails to adequately address these issues. However, as discussed below, the EIR provides an in-depth analysis of the possible health effects of fine particulates.

The comment cites a California Office of Environmental Health Hazard Assessment (OEHHA) study regarding long-term exposure to ultra fine particulate matter. First, it is important to note

that this OEHHA study reviewed the effects of $PM_{1.0}$. Specifically, this study considered long-term exposure (i.e., for a period of 7 continuous years) to operational sources of gas- and diesel-fueled vehicles, meat cooking, and high-sulfur fuel combustion. The term construction does not appear anywhere in the study, which is titled *Associations of Mortality with Long-Term Exposures to Fine and Ultrafine Particles, Species and Sources: Results from the California Teachers Study Cohort* and is available here: https://ehp.niehs.nih.gov/doi/10.1289/ehp.1408565. It is also important to note that just as $PM_{2.5}$ is a subset of $PM_{10}$, $PM_{1.0}$ is a subset of $PM_{2.5}$. Therefore, the analysis of $PM_{2.5}$ criteria pollutant emissions provided in the EIR and the associated construction Health Risk Assessment (HRA), which was prepared in accordance with OEHHA methodology, does inherently include an analysis of ultrafine particulate matter. As described in detail within the EIR and the associated construction HRA, with the implementation of all required mitigation measures – including the use of U.S. Environmental Protection Agency (USEPA) Tier 4 engines on all construction equipment – impacts to sensitive receptors would be less than significant when compared to the SCAQMD thresholds for criteria air pollutant emissions and the California Air Resources Board (CARB) thresholds for TACs.

*Comment TRAO-28*

The comment states that the industry standard for estimating the health impacts of construction activities is CalEEMod. As described in Master Response 10 – Air Quality Analysis, it should be clarified that the quantification of criteria air pollutant emissions was completed using the SCAQMD's CalEEMod. However, the analysis of potential health impacts associated with TACs was supported by detailed modeling results that rely on the USEPA's AERMOD and the CARB's Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool.

The comment goes on to make speculative and unsubstantiated claims regarding the construction schedule that has been described for the proposed Project. Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities* clearly delineate the number of truck trips associated with each subphase of construction associated with Phase 1 and Phase 2 of the proposed Healthy Living Campus Master Plan, respectively. These estimates, as with all heavy construction equipment estimates, were developed with significant input from construction managers/schedulers at CBRE and were supported by a robust Construction Management Plan that was developed to describe construction activities, sequencing, and heavy equipment requirements. It should also be noted that this level of detail is not required for a CEQA-compliant impact analysis, and that CalEEMod is often run using default construction assumptions. Therefore, the

analysis in the EIR goes beyond minimum CEQA requirements and provides a robust analysis of these potential air quality impacts.

The comment also makes speculative claims about swings in the construction schedule, asserting that there may be times where truck trips are delayed and must be made up for the next day. Consistent with the requirements of CEQA Guidelines 15003, the description of construction activities clearly makes a *"a good-faith effort at full disclosure"* and is based on detailed construction scheduling information provided by a qualified construction management firm with decades of experience managing projects far more complex than the proposed redevelopment of the campus. This analysis based on expert input, accounts for the typical variations in construction schedules that can occur, and provides detailed emissions projections based on this information. As described in Section 3.2, *Air Quality*, the quantified peak daily construction emissions disclosed in the EIR represent the potential worst-case maximum daily emissions of a construction day, and do not represent the lesser emissions that would typically occur during every day of construction associated with the proposed Project. For example, although compliance with SCAQMD rules and regulations would be required during construction (e.g., SCAQMD Fugitive Dust Rule, etc.), compliance with these rules were not included in CalEEMod in order to prepare a conservative analysis of the potential worst-case unmitigated construction emissions. Additionally, as shown in Table 3.2-5, the analysis considers the worst-case unmitigated emissions during any given year as the peak daily total. For example, the analysis considers the emissions of carbon monoxide (CO) to be 55 pounds per day during all phases of construction, even though this level of CO emissions would only occur during the third year of construction in Phase 2 (2031). Given these conservative assumptions, it is unreasonable, and unsupported by substantial evidence, to assert that there would be routine, prolonged, two-fold increases in maximum daily construction activities or associated air pollutant emissions.

It should also be noted that the air quality analysis addresses impacts from each piece of heavy construction equipment located on the Project site, not just haul trucks. Even with the assumption of hypothetical task completion date bonuses that have been raised in the comment, if material export is not required during a particular day, other construction activities and heavy equipment use would still occur on the Project site. The opposite would also be true during periods of increased material export, when other construction activities would be reduced to accommodate the increased activity of haul trucks on-site. The CalEEMod analysis conservatively assumes the maximum overlap of activities consistent with physical limits on heavy equipment use associated with variables including, but not limited to, the rate of excavation, demolition, and construction, the time required for material loading and delivery, and the limitation on construction hours as required by the RBMC and TMC, etc.

For the purposes of assessing TACs during construction, the construction HRA conservatively quantifies cancer risk and non-cancer chronic health effects at the point of maximum impact (PMI) and for the maximum exposed individual resident (MEIR). The PMI is the location where the cancer risk or non-cancer chronic health effect is maximum, regardless of the presence of a human receptor at that location. No concentration higher than the PMI would occur from the proposed construction activities. The MEIR is the location with the highest cancer risk or non-cancer chronic health effect where a person can be reasonably present. Health risk calculations were performed using the OEHHA methodologies and exposure parameters (including age sensitivity factors) as well as the corresponding SCAQMD guidance documents to ensure that the EIR provides a reasonable analysis of these issues.

For additional detailed discussion and response to comments regarding the methodology, assumptions, and results of the quantitative air quality model refer to Master Response 10 – Air Quality Analysis.

*Comment TRAO-29*

The comment selectively excerpts a portion of the of the EIR that summarizes the findings of the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch Case (April 6, 2015, Attachment A). As described in the EIR, it is important to note that it was the relevant regulatory agency, SCAQMD, which concluded that *"regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations associated with individual projects."* Regional modeling tools are generally designed to be used at the national, State, regional, and/or city levels, and are not well equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project would directly impact human health in a particular area. This is not a specific position or approach by BCHD to plow ahead as the commenter asserts.

It should be noted that even though the proposed Project would be consistent with the SCAQMD's 2016 Air Quality Management Plan (AQMP) as discussed under Impact AQ-1, issues related to impacts to human health are addressed in detail under Impact AQ-4 and supported by a construction HRA that evaluated individual lifetime cancer risks and non-cancerous chronic hazard index (HIc) associated with diesel particulate matter (DPM) emissions during construction activities associated with the Phase 1 preliminary site development plan and the Phase 2 development program.

*Comment TRAO-30*

The comment asserts that the fugitive dust control mitigations are not sufficient and suggests the incorporation of additional mitigation measures to be reviewed and approved by the City of

Redondo Beach and the City of Torrance. Most notably the comment calls for an Air Quality Compliance Monitor to be on-site during all construction activities during which fugitive dust is generated. As described in Master Response 10 – Air Quality Analysis, CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that *"…until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. Therefore, the EIR provides robust recommendations for fugitive dust control and a monitoring program that would ensure implementation.

Though no citations or references are provided, the other provisions listed in the comment appear to be taken from SCAQMD fugitive dust mitigation measures that are compiled in Tables XI-A through XI-E and are publicly available here: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust. These measures shall be implemented if required for compliance with applicable SCAQMD rules during construction, and would be required separately from the implementation of mitigation measures as a matter of regulatory compliance (refer to Section 3.2.2, *Regulatory Setting*). Both CARB and SCAQMD regulate and enforce air pollution regulations. Both agencies have the right to conduct inspections of air pollution sources, and the right to issue violations that can lead to penalties. BCHD and its construction monitors would cooperate with any such regulatory agency follow up and inspections, as well as ongoing monitoring and inspections from responsible agencies such as the City of Redondo Beach.

*Comment TRAO-31*

The comment asserts that by closing windows in response to noise, residents and other building occupants would be subjected to formaldehyde-related carcinogenic effects. While a quote is provided from Certified Industrial Hygienist Francis Offerman, along with a link to his resume as an expert witness, the context in which this statement was made is unknown and no supporting documentation was provided by the commenter. Without specific knowledge of building materials and the indoor air environment on the campus, this comment is speculative and it alleged application to the Proposed project unsupported by substantial evidence.

*Comment TRAO-32*

The comment restates that the EIR must adhere to a higher standard and that compliance with the required mitigation measures must be monitored. However, the EIR provides robust analysis and detailed mitigation measures and a comprehensive MMRP to ensure compliance. Refer to the responses to Comment TRAO-25 and TRAO-30.

*Comment TRAO-33*

This comment presents a list of issues concerning the noise analysis, which are addressed in detail in the responses to Comment TRAO-34 through TRAO-38. Refer to Master Response 12 – Noise Analysis for detailed discussion and a response to comments pertaining to the quantitative noise modeling, assumptions, and results.

*Comment TRAO-34*

This comment references Table 3.11-16 in the EIR, which identifies temporary, but prolonged, construction-related noise impacts to on- and off-site sensitive receptors. The comment correctly notes that temporary, but prolonged construction-related noise would exceed the identified Federal Transit Authority (FTA) thresholds for the following sensitive receptors:

- West Torrance residents adjacent to Flagler Alley;
- West Torrance residents adjacent to Flagler Lane;
- Redondo Beach residents along Beryl Street to the North; and
- Redondo Beach residents along North Prospect to the North.

The comment notes that the threshold of significance for noise impacts identified in the EIR is based on the FTA Transit Noise and Vibration Impact Assessment Manual, which states that an 8-hour continuous noise level ($L_{eq}$) of 80 dBA and a 30-day average of 75 dBA $L_{dn}$ is a reasonable criterion for assessment of construction activities on residential land use. As described in the EIR, this unit of measurement is appropriate because $L_{eq}$ can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,
- Average noise over all phases of the construction.

Given the duration of construction activities associated with the Phase 1 site development plan and the more general Phase 2 development program, the noise metric $L_{dn}$, averaged over 30-days, was also assessed.

The comment asserts that the noise analysis should also address the effects of $L_{max}$. It should be noted that the typical ranges of $L_{max}$ at 50 feet for typical construction equipment that would be used during construction are disclosed in Table 3.11-15. As described in Section 3.11.4, *Impact Assessment and Methodology*, construction noise levels at on- and off-site locations were estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model where inputs included distance from construction equipment to receptor, equipment types, and usage factor, which is presented as a percentage of the equipment operating at full power within a given time frame. $L_{max}$ noise levels for each piece of heavy construction equipment were considered as inputs during the preparation of the noise analysis. However, as a matter of common practice, construction impact analyses does not make findings based on $L_{max}$ alone. This is because construction-related noise levels fluctuate by day or even by hour with each construction activity (e.g., demolition, grading, foundation construction, framing, interior work, etc.) as well as the specific location of heavy construction equipment and the duration of use. It is unreasonable to assert that a sensitive receptor would experience the $L_{max}$ for the entire duration of construction, because that would mean that the same piece of construction equipment would be located in the same location operating at maximum capacity for the entire duration of construction.

Further, the comment does not suggest any specific threshold related to $L_{max}$. As described in Section 3.11.3, *Regulatory Setting*, construction activities are permitted in Redondo Beach between 7:00 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (RBMC Sections 4-24.503 and 9-1.12). Similarly, construction activities are permitted in Torrance between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (TMC Section 6-46.3.1). Neither of the local noise ordinances establish quantitative noise limits or other standards for construction. For that reason, the Detailed Analysis Construction Noise Criteria presented in the FTA's *Transit Noise and Vibration Impact Assessment Manual* have been used as reasonable criteria for assessment and, if exceeded, could result in adverse community reaction. Pursuant to CEQA Guidelines Section 15064.7(b) lead agencies have discretion to formulate their own significance thresholds and may use thresholds on a case-by-case basis. CEQA Guidelines Section 15064.7(c) states that *"[w]hen using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency…is supported by substantial evidence."* The use of the FTA Detailed Analysis Construction Noise Criteria clearly meets these requirements. Finally, urban redevelopment projects by nature often involve prolonged

construction noise that can impact adjacent uses in already built out communities. The EIR provides analysis of such impacts and requires stringent mitigation measures to reduce such impacts along with ongoing monitoring to be implemented through the MMRP. This approach complies with CEQA requirements and local ordinances and commits BCHD to reducing such impacts to the maximum extent feasible.

*Comment TRAO-35*

The comment incorrectly states that the potential impacts of Emergency Medical Technician (EMT) sirens are not analyzed. Impact NOI-1 in Section 3.11, *Noise* clearly discloses noise associated with emergency responses. As described therein, the development of Phase 1 of the proposed Healthy Living Campus Master Plan would incrementally increase the total number of individuals requiring ambulance services through the proposed addition of 177 new Assisted Living bed spaces to the existing 120 Memory Care bed spaces, bringing the total permanent residents supported at the site to 297. Based on an assumed average of 0.82 annual calls per bed space per year to the existing campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). When sirens are necessary for an emergency response, they typically emit noise at a magnitude of approximately 100 dBA at 100 feet. A decrease of approximately 3 dBA occurs with every doubling of distance from a mobile noise source. Therefore, during a response requiring sirens, residences along North Prospect Avenue and Beryl Street experience peak short-duration exterior noise levels between 91 and 100 dBA. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic. Thus, given the infrequent and short duration of siren utilization responding to emergency situations, noise impacts from emergency vehicles would constitute intermittent nuisance noise in surrounding areas, but would be less than significant. As described further in the response to Comment TRAO-124, the local wind and topography may create an environment in which siren noise can also be heard at a longer distance and for longer durations, given the distance from the source and intervening structures alone, this would not constitute an exposure to peak noise levels of 91 to 100 dBA. Again, such periodic noise generation would constitute periodic nuisance noise and would not exceed accepted thresholds and would therefore be less than significant.

While there have been studies and documented instances related to occupational hearing loss related to sirens (e.g., EMTs, firefighters, etc.), the results generally indicate a correlation between hearing loss and the duration of siren noise exposure. (As an example, please see *Accelerated*

*hearing loss in urban emergency medical services firefighters* available here: https://pubmed.ncbi.nlm.nih.gov/3985464/.) The assertion that sensitive receptors within the vicinity of the campus would experience hearing loss as a result of an estimated total of 244 ambulance calls per year (i.e., approximately 20 calls per month) is unfounded and not supported by the literature cited in the comment. Such health-related noise impacts are typically related to long-term exposure to very frequent high-level noise and not periodic short-term noise events.

*Comment TRAO-36*

This comment asserts that if the proposed Project is implemented, adjacent sensitive receptors could experience headaches, increased allergy symptoms, insomnia, and other health issues. However, the provided citation generally discusses the broad spectrum of noise sources in the modern setting, does not specifically address construction-related noise (with the exception of brief references to on-site construction workers), and does not reference any one of the aforementioned symptoms and therefore does not appear to constitute substantial evidence in the record to support such contentions.

The comment goes on to correctly summarize that the EIR identifies a potentially significant noise impact as construction noise levels cannot be mitigated to a less than significant level due to technical issues and constraints associated with the construction of noise barriers for the proposed Project. However, the comment claims that MM NOI-1 ignores numerous measures and broadly cites the International Organization for Standardization (ISO) 11690 series as well as the Acoustical Society of America to support this assertion. First it is important to note that MM NOI-1 requires the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division as well as the Torrance Building & Safety Division for activities within the City of Torrance right-of-way. MM NOI-1 is not intended to reduce or in any way limit the implementation of appropriate measures to reduce construction-related noise. Therefore, this mitigation measure has been revised to state: *"BCHD's construction contracts shall require implementation of all construction best management practices (BMPs) identified in the Construction Noise Management Plan, which could include, but would not be limited to the following:…"*

However, with regard to ISO 11690 and the Acoustical Society of America citations provided in the comment, these publications specifically deal with occupational noise. For example, ISO 11690 specifically states that *"[t]he ISO 11690 series should be useful to persons such as plant personnel, health and safety officers, engineers, managers, staff in planning and purchasing departments, architects and suppliers of plants, machines and equipment…By giving guidelines for noise control strategies and measures, the ISO 11690 series aims at a reduction of the impact*

*of noise on human beings at workplaces. Assessment of the impact of noise on human beings is dealt with in other documents."* It was for this reason ISO 11690 and the Acoustical Society of America were not specifically cited in MM NOI-1, as it appears largely inapplicable to construction-related noise.

With regard to the suggestion for enclosures, MM NOI-1 has been revised to state: *"If required by the City of Redondo Beach Building & Safety Division or the City or Torrance Building & Safety Division for construction activities within the City of Torrance right-of-way, enclosures could also be used for specific pieces of construction equipment."* This approach would clearly not be practicable for large pieces of heavy equipment (e.g., cranes) or mobile equipment (e.g., graders); however, it could be feasible for smaller stationary equipment (e.g., generators).

*Comment TRAO-37*

The comment incorrectly states that the noise impacts during transitions are not analyzed, implying that the noise analysis did not consider sensitive receptors on-site during the proposed demolition of the Beach Cities Health Center that would occur toward the end of Phase 1. As described under Impact NOI-1 and as clearly shown in Table 3.11-16, the construction noise analysis for Phase 1 did consider on-site sensitive receptors during demolition activities. Additionally, as described under Impact NOI-1 and as clearly shown in Table 3.11-17, the construction noise analysis in Phase 2 also considered the on-site RCFE Building, including the Assisted Living units and Memory Care units. However, contrary to the suggestion that the EIR is required to specify the plan to compensate for the loss of business and/or waiver of lease default penalties these financial issues do not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

*Comment TRAO-38*

The comment asserts an opinion that under schedule pressure and the forfeiture of bonuses mitigation measures may not be appropriately enforced. The comment goes on to suggest monitoring provisions for inclusion in a noise suppression plan. It is important to note that MM NOI-1 requires the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division and the Torrance Building & Safety Division for activities within the City of Torrance right-of-way. As described in MM NOI-1, during construction, BCHD would be required to monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Construction Noise Management Plan. Further, BCHD would be required provide a non-automated telephone number for residents and employees to call to submit complaints associated

with construction noise. BCHD would be required keep a log of complaints and address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach Building & Safety Division and the Torrance Building & Safety Division would have the authority require modification to the conditions of the Construction Noise Management Plan, that fall under their respective jurisdictions, if necessary, to address non-performance issues. Thus, mitigation monitoring and enforcement will be vigorously overseen and led by BCHD and its contractors, while other agencies such as the cities of Redondo Beach and Torrance as well as other regulatory agencies (e.g., SCAQMD) will all participate in monitoring and enforce within their respective jurisdiction and areas of authority. CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment TRAO-39*

This comment raises overarching issues with the transportation analysis, which are addressed in detail in the responses to Comment TRAO-40 through TRAO-66. Refer to Master Response 14 – Transportation Analysis for detailed discussion and a response to comments pertaining to the quantitative modeling, assumptions, and results of the transportation studies prepared by Fehr & Peers.

*Comment TRAO-40*

The comment states that the designation of an environmental impact as significant in an EIR does not permit the EIR dismiss the discussion and description of the magnitude of that impact. This statement is generally consistent with the requirements in CEQA Guidelines Section 15126.2. However, it should be noted that the EIR includes thorough discussions and descriptions of the potential environmental impacts, including potential impacts to transportation. Further, that the magnitude of each impact identified in Section 3.14, *Transportation* is also described. To be clear Section 3.14, *Transportation* does not identify any significant and unavoidable impacts.

*Comment TRAO-41*

The comment summarizes the technical findings of the Non-CEQA Intersection Operational Evaluation prepared by Fehr & Peers and included as Appendix J to the EIR. As discussed in detail in Section 3.14.2, *Regulatory Setting*, it should be noted that changes in State law now require that CEQA analysis be based on vehicle miles traveled (VMT) by measuring the number and distance

of daily vehicle trips, rather than the previous practice of analyzing level of service (LOS) by measuring intersection congestion and roadway capacity. This reflects State policy goals to reduce vehicle energy use, particularly energy use associated with non-renewable fossil fuels, and associated greenhouse gas (GHG) emissions and their adverse effects on global climate change. Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and intersted residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

*Comment TRAO-42*

The comment simply cites the definitions of LOS provided in the Non-CEQA Intersection Operational Evaluation; Table 4 provides the LOS definitions for signalized intersections and Table 5 provides the LOS definitions for unsignalized intersections. in addition, Table 6 presents the existing LOS for each of the evaluated intersections.

*Comment TRAO-43*

While the comment correctly states that seven intersections would operate at LOS E or LOS F at one or both of the peak hours, the comment fails to acknowledge that the intersections would operate at these conditions without the implementation of the proposed Project as described for the Cumulative (2032) Baseline condition. In fact, implementation of the proposed Project would result in a minor reduction in the volume-to-capacity (V/C) ratio or intersection delay for the AM and PM peak hour at each of these intersections, with the exception of the intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street. This, again, is due to the minor reduction in peak hour trips associated with the proposed Project. The intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street would experience a minor increase in the V/C ratio or intersection delay as a result of the redistribution of vehicle trips associated with the proposed

Project; however, as with each of the other intersections evaluated in the Non-CEQA Intersection Operational Evaluation, these minor increases in V/C ratios or intersection delays would not exceed the thresholds of evaluation as identified by the City of Redondo Beach or the City of Torrance.

The suggested mitigation measures are unnecessary and would exceed requirements of CEQA because: 1) SB 743 and CEQA Guidelines 15064.3 eliminates the measurement of vehicle delay, or LOS, as a metric that can be used for measuring traffic impacts; and 2) the minor increases in V/C ratios or intersection delays at the intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street would not exceed any thresholds of evaluation previously identified by the City of Redondo Beach or the City of Torrance.

*Comment TRAO-44*

The comment notes that Section 3.2, *Air Quality* only identifies five intersections that would operate at LOS E or LOS F under future operational year (2032) plus Project conditions. This list has been corrected to include the following two intersections that were inadvertently omitted:

- Flagler Lane & 190th Street (AM and PM peak hour)
- Harkness Lane & Beryl Street (AM and PM peak hour)

This minor correction does not affect the analysis of CO hotspots, because the most heavily trafficked intersection within the vicinity of the Project site that would be affected by the proposed Project is still Hawthorne Boulevard & Del Amo Boulevard. As described in Section 3.2, *Air Quality*, this intersection currently experiences approximately 89,300 vehicle trips per day, or approximately 89.3 percent of the 100,000 vehicles per day experienced at the Wilshire Boulevard and Veteran Avenue intersection evaluated in the CO Plan for the SCAQMD's 2003 Air Quality Management Plan.

*Comment TRAO-45*

The comment asserts that there was no analysis directed at reducing the deficiencies of the existing public transit network. Implementation of the proposed Project would not adversely affect the operation of the existing public transit network. For example, the comment asserts that BCHD should work with the six County Transportation Commissions that make up the Southern California Association of Governments (SCAG). The EIR provides extensive analysis of the existing transportation network – including public transit, bicycle, and pedestrian facilities – and its relationship to the proposed Project. The EIR finds that the proposed Project would not generate an increase in daily vehicle trips or VMT that would result in a significant transportation impact.

Nevertheless, mitigation MM T-1 is recommended to provide additional information and guidance on the proposed TDM measures to be included in the Transportation Demand Management (TDM) plan required pursuant to RBMC Section 10-2.2406. The TDM plan, which would further reduce an impact that is already less than significant, would encourage visitors to travel to the campus via active transportation (e.g., walking, biking, etc.), consistent with BCHD's mission to promote health and well-being. For example, BCHD would provide a bicycle sharing program for access to the adjacent bicycle paths and local surroundings as well as bicycle facilities, such as bicycle parking, a bicycle repair station, and employee shower and locker facilities. The TDM plan would also include transit and carpool incentives for employees, such as subsidized Beach Cities Transit passes and designated parking for vanpools and carpools. Therefore, the EIR requires BCHD to go beyond CEQA requirements for mitigation to encourage use of alternative transportation to further reduce minor incremental increases in vehicle trips associated with the proposed Project.

*Comment TRAO-46*

The comment selectively quotes and contests the conclusion that there are no discernable existing hazards in the vicinity of the Project site due to roadway and driveway configuration but fails to acknowledge the EIR's extensive supporting discussion regarding circulation hazards, with supporting technical analysis prepared by Fehr & Peers, a nationally recognized transportation planning and engineering firm.

As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. Based on the most recently available 5-year collision data (between 2013 and 2018), 323 collisions (i.e., approximately 27 per year on average) occurred within the vicinity of the Project site on streets used to access the site. Of the total number of collisions, which included people driving, walking, and biking, 12 resulted in serious injury and five resulted in fatalities (refer to Table 3.14-2).

Immediately adjacent to the Project site, along Beryl Street and North Prospect Avenue, there was a smaller number of collisions, as compared to other arterial roadway segments in the region such as Hawthorne Boulevard, West 190$^{th}$ Street, and Del Amo Boulevard. In total, there were 17 collisions between 2013 and 2018 (i.e., approximately 5.3 percent of total collisions during the period), which were on the Beryl Street and North Prospect Avenue segments and/or within 200 feet of a key intersection on roadways used to access the Project site. Of these collisions, three collisions resulted in serious injury and one resulted in a fatality. The fatality occurred at North Prospect Avenue & Diamond Street, and involved a motorcyclist. Five collisions occurred at North Prospect Avenue & Diamond Street (closest to the southernmost driveway at the Project site),

which was the highest number of collisions closest to the Project site. There were no discernable patterns with regard to collision types (e.g., broadside, rear end, or head-on collisions).

The EIR provides an in-depth discussions of transportation safety issues in the vicinity of the Project site to support its conclusions. The comment provides no substantial evidence to contest these findings.

*Comment TRAO-47*

The comment selectively quotes the simple definition of cut-through traffic provided in Section 3.14.1, *Environmental Setting* and incorrectly uses it to assert that the EIR has acknowledged that cut-through traffic would be exacerbated by the proposed Project.

This issue of cut-through traffic has been studied by Fehr & Peers (see Appendix K) as well as the City of Torrance, including various field studies, observations, and traffic counts conducted during the preparation of the EIR. As described in Section 3.14.1, *Environmental Setting*, based on these studies, cut-through traffic in these the neighborhood to the east of the Project site is associated with commuting as well as student pick-up and drop-off at Towers Elementary School.

As described under Impact T-3, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by turning right off of Flagler Lane and exit the building turning left onto northbound Flagler Lane (refer to Figure 2-8). Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to parking on the campus and as such, would not be a primary entrance to the campus. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood. Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation, the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times and thus would either not contribute to or generate increased neighborhood cut-through traffic. Based on detailed analysis by Fehr & Peers, this minor reduction in overall peak hour vehicle trips would not increase congestion and may provide incremental improvements in the movement of traffic and less incentive for drivers to cut-through the adjacent residential neighborhoods. Therefore, the proposed Project would not

contribute to operational safety hazards related to cut-through traffic, and impacts would be less than significant.

Finally, the comment represents general unsupported opinion and does not raise any issues regarding the adequacy of the analysis of cut-through traffic presented under Impact T-3.

*Comment TRAO-48*

The comment raises general issues, without substantial evidence or expert opinion, about potential pedestrian-vehicle safety conflicts related to the proposed vehicle access off of Flagler Lane. However, the EIR exhaustively analyzes potential transportation-related impacts, including potential pedestrian-vehicle safety issues related to the proposed vehicle access off of Flagler Lane (refer to Impact T-3). The development of new sidewalks as a part of the BCHD Bike Path Project are addressed in the cumulative impacts discussion. As described therein, implementation of the Class II bicycle lane along Flagler Alley and segments of Flagler Lane and Diamond Street would be designed with consideration of the proposed Project design features to protect pedestrians and bicyclists along the Class II bicycle lanes as they cross Towers Street. Further, as with the proposed Project, the BCHD Bike Path Project would be subject to site plan review and would meet local street design and access requirements enforced by the Redondo Beach Building & Safety Division. For this reason, implementation of the proposed Project would neither result in safety impacts nor create a substantial contribution to cumulatively considerable impacts related to design features.

*Comment TRAO-49*

The comment asserts that the additional access point off of Beryl Street is not needed, and that the EIR should consider an alternative that would distribute traffic to North Prospect Avenue for the purpose of reducing the potential for vehicle-pedestrian and vehicle-bicycle conflicts along Flagler Lane, where the future bicycle path is being designed. However, this comment expresses an unsubstantiated opinion about the proposed Project that has been subject to extensive planning and design consideration. In addition, as discussed in detailed in response to comment TRAO-49, the EIR thoroughly describes the potential for vehicle-pedestrian and vehicle-bicycle conflicts along Flagler Lane.

Additionally, the EIR does include the analysis of Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative, each of which includes an alternative access and circulation scheme that eliminates the proposed vehicle access on Flagler Lane. While not specifically necessary to reduce any identified vehicle-

pedestrian and vehicle-bicycle conflicts, the implementation of any of these alternatives would entirely avoid vehicle entry/exit along Flagler Lane.

*Comment TRAO-50*

The comment asserts that the existing curb cut and driveway to the vacant Flagler Lot is temporarily closed off at the direction of BCHD and claims, without substantial evidence or analysis, that there is no need for additional access points (also refer to the response to comment TRAO-50). As described in Section 2.0, *Project Description* the additional vehicle access points along Flagler Lane would provide for the preferred internal circulation within the campus, with this current design subject to considerable consideration by BCHD. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed as an entry/exit to the subterranean service area and loading dock associated with the RCFE Building. Nevertheless, Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, which is designated as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. The City of Torrance is also considering the potential removal of southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood issues related to existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. For these reasons, Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative each consider an alternative access and circulation scheme, which eliminates the proposed vehicle access on Flagler Lane.

*Comment TRAO-51*

The comment incorrectly claims that the transportation analysis presented in the EIR is limited to a discussion of VMT and further asserts that no other analyses were conducted. In contrast with this assertion, the EIR thoroughly analyzes all aspects potential transportation-related impacts, focusing on CEQA mandated issues such as VMT as well as roadway geometry and safety. As acknowledged in the comment and as described further in Section 3.14, *Transportation*, under SB 743, the focus of transportation analysis has shifted from LOS to VMT and the reduction of GHG emissions. As a result, Section 15064.3 was added to CEQA Guidelines, which states *"generally, vehicle miles traveled is the most appropriate measure of transportation impacts."*

Nevertheless, contrary to the assertion in the comment that the EIR provides no other analysis, Section 3.14, *Transportation* also discusses consistency with: plans, ordinances, and polices; geometric design features and incompatible use hazards and emergency access; and cut-through traffic analysis. Each of these analysis is supported by detailed technical transportation studies based on quantitative construction assumptions or quantitative data provided in the transportation studies prepared by Fehr & Peers. As previously discussed in the response to Comment TRAO-41, at the request of the City of Redondo Beach and the City of Torrance, and separate from the Vehicle Miles Traveled Study, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and the City of Torrance (see Appendix J).

*Comment TRAO-52*

The comment cites Section 5.5.3, *Alternative 3 – Revised Access and Circulation*, which acknowledges that the City of Torrance is considering the potential removal of southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood issues associated with existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project.

The comment asserts, without support of technical analysis or expert opinion, that service and delivery vehicles could choose to drive through the Torrance neighborhood to enter the service area and loading dock entrance. However, the comment fails to acknowledge TMC Section 61.9.1, Commercial Vehicles; Load Limits on Streets, which states:

> *"Any commercial vehicle exceeding the maximum gross weight of eight thousand (8,000) pounds is hereby prohibited from using any street in the City of Torrance except as hereinafter provided.*
>
> *A commercial vehicle is a vehicle of a type required to be registered under the Vehicle Code of the State of California used or maintained for the transportation of persons for hire, compensation, or profit or designed, used and maintained primarily for the transportation of property."*

Therefore, as described in Section 5.5.3, *Alternative 3 – Revised Access and Circulation*, the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street

and Towers Street would not exacerbate cut-through traffic; rather, it would conflict with and eliminate the use of the service access along Flagler Lane, consistent with the requirements of TMC Section 61.9.1. For that reason, Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative each consider an alternative access and circulation scheme, which eliminates the proposed vehicle access on Flagler Lane.

*Comment TRAO-53*

The comment states that the transportation and air quality impact analyses declare impacts to be less than substantial or less than substantial with mitigation and requests that the EIR define these terms. However, this comment inaccurately portrays discussion in the EIR and neither the transportation nor air quality impact analysis use these terms to discuss impacts associated with the proposed Project. The analysis does discuss whether impacts associated with the proposed Project would *"substantially contribute to cumulatively considerable impacts."* This terminology is defined in CEQA Guidelines Section 15065(a)(3), which states that *"'[c]umulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."*

*Comment TRAO-54*

The comment incorrectly states that the analysis in the EIR of the effects of traffic-induced GHG emissions is either vague or not present. However, the EIR provides an exhaustive discussion of mobile source GHG emissions is provided in Section 3.7, *Greenhouse Gas Emissions and Climate Change* and is supported by quantitative modeling provided in Appendix B. The need for the suggested mitigation measures is unfounded as no significant impacts have been identified in Section 3.7, *Greenhouse Gas Emissions and Climate* or Section 3.14, *Transportation*. In fact, as described in Table 3.7-7, the proposed Project would result in a reduction of 741.7 metric tons of carbon dioxide equivalent (MT $CO_2e$) per year. As such, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

*Comment TRAO-55*

The comment questions whether BCHD has received authorization to expand its sphere of influence. However, the proposed Project does not propose to expand or otherwise change BCHD's sphere of influence. In addition, it is unclear what is meant by this question with respect to VMT. However, to provide potentially relevant context, Fehr & Peers obtained average trip

length data for the campus using StreetLight location-based service data from 2019, prior to the onset of the COVID-19 pandemic. Using the StreetLight portal, Fehr & Peers mapped the relative weight of the origin/destination grid cells to and from the campus, which revealed that the average weekday trip length to and from the campus is 6.4 miles, and the average weekend trip length is 6.3 miles. Given that the proposed Project would redevelop the existing campus with uses that would continue to serve the Beach Cities and surrounding South Bay communities, existing trip lengths are likely to remain similar under the proposed Project. StreetLight data were also evaluated for Brookdale South Bay located at 5481 West Torrance Boulevard in Torrance. Fehr & Peers calculated an average trip length of 4.8 miles using the StreetLight data for Brookdale South Bay. These data supported the findings of less than significant impacts to VMT.

*Comment TRAO-56*

The comment states that BCHD must clearly state and commit to funding mitigations that will result from unmitigated significant impacts to greenhouse gases, air quality, transportation, and land use. However, the EIR clearly sets out the required mitigation measures for these impacts and CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 requires that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

The comment also suggests a number of mitigation measures identified by the Southern California Association of Governments (SCAG) that are capable of avoiding or reducing the potential for conflict with the established measures of effectiveness for performance of the circulation system. However, the suggested mitigation measures are not needed because the proposed Project would

not result in any significant transportation impacts. The EIR already goes beyond minimum CEQA requirements by requiring a comprehensive TDM plan be implemented to further reduce already limited Project related transportation impacts.

*Comment TRAO-57*

The comment states that the EIR must provide information about how many trips may come from outside the surrounding area as well as other information describing what cities will be served, how far will the clients travel, and what routes and services will be impacted. However, the EIR already thoroughly addresses these issues. Each of these questions is addressed in the Vehicle Miles Traveled Study provided by Fehr & Peers (see Appendix K). As described in the response to Comment TRAO-55, the average weekday trip length to and from the campus is 6.4 miles and the average weekend trip length is 6.3 miles. Given that the proposed Project would redevelop the existing campus with uses that would continue to serve the Beach Cities and surrounding South Bay communities, existing trip lengths are likely to remain similar under the proposed Project. StreetLight data were also evaluated for Brookdale South Bay located at 5481 West Torrance Boulevard in Torrance. Fehr & Peers calculated an average trip length of 4.8 miles using the StreetLight data for Brookdale South Bay to estimate the average trip lengths associated with the proposed Assisted Living program and Memory Care community. Together, these data supported the findings of less than significant impacts to VMT.

*Comment TRAO-58*

The comment contends that the Transportation Demand Plan (TDP); presumably this comment is referring to the TDM plan described under Impact T-2. However, the EIR already requires a comprehensive TDM plan to further reduce vehicle trips associated with the proposed Project. As described therein the proposed Project would not generate VMT that would result in a significant transportation impact, MM T-1 is recommended to assist in implementing the TDM plan required for the proposed Project pursuant to RBMC Section 10-2.2406, which would further reduce this less than significant impact. Implementation of the TDM plan would generally include promotion of alternative transportation modes and carpool incentives for employees, which would further reduce VMT associated with the proposed Project. The TDM plan would also encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being. The TDM plan would also include transit and carpool incentives for employees, such as subsidized Beach Cities Transit passes and designated parking for vanpools and carpools.

The need for the incorporation of the additional items described in the comment (e.g., *"strategies, as determined to be appropriate by the cities, that would produce a minimum fifteen [15] percent reduction of new vehicle trips to the HLC"*) are unnecessary, and not supported by substantial evidence in the record or technical studies, because the proposed Project would result in a less than significant impact to VMT.

*Comment TRAO-59*

The comment asserts that construction traffic impacts are not adequately analyzed and states that a detailed Construction Worksite Traffic Control Plan must be prepared. However, the EIR exhaustively analyzes construction-related traffic impacts. In addition, it the comment provides no evidence to support this contention and does not comment on the sufficiency any specific aspects of the analysis of construction-related traffic. It should also be noted that MM T-2 already requires the preparation and implementation of a Construction Traffic Control Plan, subject to review by the County Department of Transportation (DOT) and Redondo Beach Engineering Division prior to issuance of a CUP. In addition, each of the requested measures is already incorporated in MM T-2. The only exception is the request for a *"[d]etermination of whether or not the mitigation efforts developed above combined with other mitigation and regulatory compliance measures in the EIR are equal to or more effective than the SCAG RTP/SCS Program EIR T-2 in avoiding conflicts with any other congestion management program within the jurisdictions of the BCHD."* No explanation of need for this suggested measure is provided, however, and it would not be needed because the proposed Project would be consistent with the relevant policies of the SCAG Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) (refer to Impact T-1). Moreover, as described in Section 3.14.2, *Regulatory Setting*, both the County and the City of Redondo Beach have opted out of the Congestion Management Program as authorized in accordance with the California Government Code Sections 65082 et seq.

*Comment TRAO-60*

The comment asserts that construction worker parking access impacts are not analyzed. However, the EIR reviews potential construction worker parking and access impacts and requires mitigation. MM T-1 clearly states that the Construction Traffic and Access Management Plan, which shall be prepared in coordination with the County Department of Transportation and the Redondo Beach Engineering Division shall *"[m]inimize parking impacts both to public parking and access to private parking to the greatest extent practicable."* As described under Impact T-1, at a minimum the plan would include:

- *"On-site staging areas, which would avoid residential streets to the maximum extent feasible;*
- *Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction flaggers at the three driveways along North Prospect Avenue as well as the proposed driveways along Beryl Street and Flagler Lane) to address circulation requirements and public safety in accordance with the standards in the County DOT Area Traffic Control Handbooks;*
- *Emergency access provisions (i.e., North Prospect Avenue and Beryl Street); and*
- *Construction crew parking."*

The last bullet has been revised to describe *"On-site construction crew parking to the maximum extent feasible. Prohibition of crew parking in adjacent residential neighborhoods."* The additional measures suggested in this comment will be incorporated into the Construction Traffic and Access Management Plan if required by the County Department of Transportation and the Redondo Beach Engineering Division during the development of the plan.

*Comment TRAO-61*

The comment asserts that a Bicycle Usage Plan must be prepared as a part of the TDM plan and suggested a number of measures that should be included. However, the comment does not provide any evidence to support this assertion. Further, as described in Section 2.5.1.3, *Proposed Access, Circulation, and Parking*, bicycle facilities would be provided for employees, residents, participants, and other visitors to the campus. Short-term bicycle parking would be provided at the main entrance off of North Prospect Avenue. Bicycle facilities would also include a bicycle repair station and shower and locker facilities. In addition, as described in Section 2.5.1.5, *Sustainability Features*, the proposed Project would implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site. The TDM plan would also encourage visitors to travel to the campus via active transportation – including biking – consistent with BCHD's mission to promote health and well-being. There would be no significant transportation impact associated with bicycle use and no nexus with a physical environmental impact that would require the preparation of a Bicycle Usage Plan with the suggested requirements such as the suggested *"one-time fixed fee contribution to be deposited into the Bicycle Plan Trust Funds of the cities of Redondo Beach and Torrance."*

*Comment TRAO-62*

The comment states that the construction work site traffic control plan must ensure that access will remain unobstructed for land uses in proximity to the project site and that coordination with the cities and emergency service providers is required to ensure adequate access. Both of these suggestions are already incorporated in MM T-2, which requires extensive notification and coordination with affected agencies and all owners and residential and commercial tenants of property within a radius of 500 feet prior to construction activities associated with Phase 1 and Phase 2 of the proposed Project.

*Comment TRAO-63*

The comment states that the analysis of the impact on public transit is incomplete. However, a complete analysis of the potential impacts to transit services as a result of the proposed Project is provided in the EIR. For example, as described in Section 3.14, *Transportation* and Appendix K, describe that the utility of transit service and its attractiveness to non-transit dependent users is affected by frequency of service or *"headways,"* with ideal peak hour service providing headways of 15 minutes or better – a measure that Beach Cities Transit Line 102 does not meet. The nearest regional transit services with shorter headways and direct service to major destinations are located more than the 0.5-mile distance that transit riders might reasonably be expected to walk to/from the campus. Given existing transit conditions and the lack of planned transit improvements within the vicinity of the Project site, transit is unlikely to provide a viable transportation alternative to driving alone for the proposed Project. As such, even with the incentives provided in the TDM plan, which would improve public transit use, the implementation of the proposed Project would not result in overcrowding or additional waits for transit that would degrade transit operations.

*Comment TRAO-64*

The comment incorrectly suggests that the funds/revenue from the proposed RCFE Building would be used for implementing transportation improvements. Neither BCHD nor the EIR have stated that the funding for the mitigation measures identified in Section 3.14, *Transportation* is contingent on the revenues generated by the proposed RCFE Building.

*Comment TRAO-65*

The comment claims that little coordination with the City of Torrance was conducted regarding the transportation analysis. However, in contrast to this assertion, BCHD and its consultants performed extensive consultation with the City of Torrance. As described in the EIR, the scope and methodology of the analysis was determined in consultation with the City of Redondo Beach

and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. Both BCHD and Fehr & Peers also closely followed the City of Torrance's public hearings regarding the potential future changes to Flagler Lane, all of which allowed for proper disclosure of this potential issue in Section 3.10, *Land Use and Planning* and Section 3.14, *Transportation* as a potential conflict with the proposed access along Flagler Lane.

*Comment TRAO-66*

The comment restates that the EIR must correct all alleged traffic mitigation deficiencies. However, the EIR already requires comprehensive mitigation measures that address construction-related and operational transportation impacts. As explained in the responses to Comments TRAO-40 through TRAO-65, the perceived requirement to revise or add additional mitigation measures is unfounded given the conclusions of the impact analysis presented in Section 3.14, *Transportation*, which is based on substantial evidence.

*Comment TRAO-67*

This comment presents a list of issues related to the GHG and climate change analysis. However, the EIR provides extensive analysis of GHG emissions and other issues related to climate change as addressed in detail in the responses to Comments TRAO-68 through TRAO-80. Refer to Master Response 10 – Noise Analysis for detailed discussion and a response to comments pertaining to the quantitative GHG emissions modeling, assumptions, and results.

*Comment TRAO-68*

The comment states that we all have a responsibility to be proactive in reducing the generation of GHG emissions. The comment also cites *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504, statements from President Biden, and assessments from the Energy Innovations and Climate Center. The EIR provides extensive analysis of GHG and climate change related issues; the relevance of these citations to the proposed Project and the GHG and climate change analysis in the EIR is unclear and not stated by the commenter.

*Comment TRAO-69*

This comment claims that the BCHD shows a lack of leadership in regard to reducing GHG emissions and a lack of empathy with the communities it is supposed to serve. However, these comments are without basis as the EIR provides detailed analysis of GHG emissions and as discussed below, the proposed Project includes multiple elements designed to reduce GHG

emissions. As described in Section 2.5.1.5, *Sustainability Features*, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed RCFE Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

- Photovoltaic solar panels occupying approximately 25-50 percent of the roof area;
- Solar hot water system to reduce energy use;
- Energy efficient heating, ventilation, and air conditioning (HVAC) systems;
- Operable windows for natural ventilation;
- High-performance building envelope – including thermal insulation;
- Controlled natural lighting and lighting systems designed with occupancy sensors and dimmers to minimize energy use;
- Water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.); and
- Interior materials with low volatile organic compound (VOC) content;
- Plant palette comprised of species adapted to the climate of Southern California;
- High efficiency irrigation system; and
- Pervious paving to promote on-site stormwater infiltration.

The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; electric vehicle (EV) charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. The proposed Project would also implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site and overall traffic on the surrounding street network. The TDM plan would include transit and carpool incentives for employees

The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification. LEED is a national certification system developed by the U.S. Green Building Council (USGBC) to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. The program promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

The proposed new buildings would also be WELL Building Certified. The WELL Building Standard is the premier standard for buildings, interior spaces and communities seeking to implement, validate and measure features that support and advance human health and wellness. WELL was developed by integrating scientific and medical research and literature on environmental health, behavioral factors, health outcomes and demographic risk factors that affect health with leading practices in building design, construction, and management.

The proposed Project also complies with Connect SoCal, the Redondo Beach and Torrance General Plans and Climate Action Plans, the RBMC, the TMC, Assembly Bill (AB) 32, and SB 32, and thus would ensure that the GHG emissions associated with the proposed Project would conform with State and local requirements (refer to Tables 3.7-8 through 3.7-10). Accordingly, the EIR concludes that the proposed Project would have less than significant impacts associated with GHG emissions.

*Comment TRAO-70*

The comment incorrectly claims that BCHD does not adequately address CEQA requirements for the reduction of BCHD emissions. The comment selectively quotes the discussion of the SCAQMD's adoption of a 10,000 MT $CO_2e$ per year as a screening level threshold of significance for a stationary source industrial project, for which SCAQMD is the lead agency. This is a misapplication of the SCAQMD's threshold, however, because it is a *"threshold for a stationary source industrial project, for which SCAQMD is the lead agency."* The proposed Project is clearly not a stationary source industrial project. The comment also does not acknowledge the net change in GHG emissions accounting for the demolition of the Beach Cities Health Center. As described in Table 3.7-7, the proposed Project would result in a reduction of 741.7 MT $CO_2e$ per year, and would therefore result in a minor beneficial impact with regard to GHG emissions. Therefore, and there is no need for the suggested mitigation measures, The GHG and climate change analysis in the EIR is supported by substantial evidence.

*Comment TRAO-71*

As in Comment TRAO-69, the commenter alleges that BCHD does not take a proactive approach to addressing GHG emissions. However, this comment ignores the multiple measures included in the proposed Project to improve sustainability and reduce GHG emissions. Refer to the response to Comment TRAO-69 for a list of sustainability features that have been voluntarily incorporated into the proposed Project, and which include the provision of EV spaces, bicycle facilities, and solar panels as requested in the comment. The comment also incorrectly states that there is no

analysis of electricity and natural gas demand associated with the proposed Project. A complete analysis of energy usage is provided in Section 3.5, *Energy*.

*Comment TRAO-72*

The comment states that the GHG mitigation measures are poorly analyzed As explained in the response to Comment TRAO-70, the implementation of the proposed Project would result in a net decrease in GHG emissions. Additional mitigation and associated analysis is not required to address any significant environmental impacts. As described in the 3.7.3, *Impact Assessment and Methodology*, that the operational emissions presented in Table 3.7-5 and Table 3.7-6 provide a conservative estimate of the actual GHG emissions, considering the fact that the quantitative modeling provided in the EIR does not account for some of the sustainability and energy efficiency measures included as part of the proposed Project (e.g., photovoltaic solar panels, energy efficient HVAC systems, high-performance building envelope usage to maximize insulation, lighting systems designed with occupancy sensors and dimmers to minimize energy use, etc.) and, therefore, conservatively overstates the proposed Project's GHG emissions.

*Comment TRAO-73*

The comment incorrectly states that by calculating the net GHG emissions associated with the proposed Project, BCHD is not going to do anything with regards to fuels and electricity. Refer to the response to Comment TRAO-69 for the extensive list of sustainability features and GHG reduction measures that have been voluntarily incorporated into the proposed Project.

*Comment TRAO-74*

This comment states that the EIR incorrectly considers baseline conditions in calculating GHG emissions associated with the proposed Project. However, the comment fails to acknowledge that compliance with CEQA requires comparing the proposed Project to existing conditions in order to determine the potential impacts associated with the proposed Project. This applies to potential impacts due to GHG emissions as well as criteria air pollutant emissions. It is incorrect to suggest that the redevelopment of an existing site with a more energy efficient use would not result in a reduction in operational GHG emissions. Taken to its logical conclusion, the methodology suggested by the commenter would mean that only a development that would have no new GHG emissions (e.g., open space) would result in GHG reductions. This is clearly not the interpretation of CARB, SCAQMD, or other relevant agencies responsible for regulating GHG emissions.

*Comment TRAO-76*

The commenter questions why the BCHD Bike Path Project is not considered to be a part of the proposed Project, and suggests that the GHG analysis should address the relationship of bicycle facilities and GHG emissions. The BCHD Bike Path Project is a separate project given that it will be grant-funded, is on a separate and distinct timeline, and can be implemented with or without the proposed Healthy Living Campus Master Plan. Accordingly, the BCHD Bike Path Project is included and addressed in the cumulative impact analysis. As described in Section 2.5.1.5, *Sustainability Features* the proposed Project would include sustainable transportation infrastructure, such as bicycle parking as well as employee shower and locker facilities. Given the net reduction in GHG emissions associated with the proposed Project, the need for additional mitigation measures (e.g., extending bicycle lanes) is unnecessary to reduce GHG emissions to a level that is less than significant.

*Comment TRAO-77*

The comment contends that potential use of the open space included in the proposed Health Living Campus Master Plan to support outdoor farmers' markets should be removed from the policy consistency analysis. However, BCHD as the proponent and lead agency has determined that this use should be included. Section 2.5.1.1, *Proposed Uses* specifically proposes the use of the outdoor space to support outdoor farmers' markets and health fair expositions. As such, its inclusion in this policy consistency analysis is appropriate and will remain in the Final EIR. The proposal for a farmers' market is neither contingent on a perceived need nor the previous use of a vacant lot for a similar use. This comment does not address the adequacy to the EIR or the impact analysis and represents the commenter's opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Project.

*Comment TRAO-78*

The comment incorrectly claims that the trip generation rates for the proposed Aquatic Center in Phase 2 were not completed by Fehr & Peers, and that the analysis uses preliminary findings. However, this statement is inaccurate and does not reflect either the analysis in the EIR or transportation study. As described in Section 3.14.3, *Impact Assessment and Methodology*, while the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10$^{th}$ Edition does describe trip generation estimates for gyms and fitness centers, it does not include trip generation estimates that are specific to aquatic centers. Therefore, Fehr & Peers used the results of the market feasibility analysis prepared by Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies, to estimate potential trip generation.

Critical factors that were considered in developing the trip generation rates for the proposed Aquatic Center in Phase 2 included the populations of the Beach Cities; the proportions of frequent, infrequent, and occasional swimmers; and the estimated market capture based on the size of the facility and the type of pool(s) that it would provide. The use of this market study by Fehr & Peers to develop trip generation rates for the proposed Aquatics Center in Phase 2 is entirely in keeping with ITE's recommendation to use local data when it is available. The methodology for the development of trip generation rates is described in detail in the Vehicle Miles Traveled Study (see Appendix K). The trip generation methodology is provided as Appendix A of the study, and the Ballard*King & Associates Market Feasibility Evaluation is provided as Appendix C of the study.

*Comment TRAO-79*

The comment states that the South Bay Aquatics Center was not used to develop aquatic center trip generation estimates because it had not been operating with regular class schedules due to the COVID-19 pandemic. This statement is correct, which led to the use of the market feasibility analysis prepared by Ballard*King & Associates to prepare the trip generation estimates (refer to the response to Comment TRAO-78).

It should be noted that while the comment attributes these statements in Appendix J to Ballard*King & Associates, the trip generation methodology presented in Appendix K and Appendix J was prepared by Fehr & Peers.

*Comment TRAO-80*

The comment states that Ballard*King & Associates was directed to use the National Sporting Goods Association (NGSA) to approximate the number of people who might participate in recreational activities. First, it is important to note that the methodology employed by Ballard*King & Associates was not directed by BCHD or Fehr & Peers. The use of the NGSA participation statistics is commonplace for determining the market for recreation activities. NGSA has more than 35 years of experience providing such data, which can be used to *"to make educated decisions about participants, including market size and composition."*

Ballard*King & Associates took the national average and combined that with participation percentages of the Primary Service Area based upon age distribution (15.8 percent), median income (16.7 percent), region (17.9 percent), and national number (16.6 percent). As acknowledged in the comment, those percentages were then averaged to create a unique participation percentage for the Primary Service Area (16.6 percent). This participation percentage, when applied to the population of the Primary Service Area, provided an estimate of the market potential for the proposed Aquatic Center. A Market Capture Rate of 3 percent was

applied given the size limitations and operational budget of the facility. This Market Capture Rate was supported by Ballard*King & Associates' previous work in the area, work across the country, and the presence of other providers. Similar market feasibility analyses have been prepared for sports facilities across California and across the Country.

The complete Aquatics Report, which is publicly available here: https://bchdcampus.org/sites/default/files/archive-files/Aquatics%20Report.pdf, thoroughly describes the applicability and use of the NSGA participation statistics in combination with local demographic data. With regard to the local data sets requested by the comment, it should be noted that the Aquatics Report includes a robust local survey involving 2,256 responses that focused on the types of aquatic programs in which the respondents were interested. This survey data contributed to and substantiated the use of the NGSA participation statistics and local demographic data.

It should also be noted that Fehr & Peers prepared trip generation estimates by building on the results of the market feasibility study. Fehr & Peers assigned vehicle occupancy factors (e.g., 1 person per vehicle for frequent swimmers as compared to 3 persons per vehicle for occasional swimmers that are likely to include families). Fehr & Peers also considered anticipated programming for the proposed Aquatics Center (e.g., hydrotherapy) to identify shared uses related to the Center for Health and Fitness (CHF) and the proposed Assisted Living program. Together these were used to develop trip generation estimates specific to the proposed Project.

The Vehicle Miles Traveled Study is clear that these are trip generation estimates. Further, as described in the response to Comment TRAO-65, the scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. The trip generation estimates for all uses associated with the proposed Project are consistent with ITE recommendations and each of the cities guidelines for preparing transportation studies. This clearly meets the requirement of CEQA Guidelines Section 15003(i), which states *"CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure."*

Therefore, the trip generation estimates for the proposed Aquatics Center were appropriate for estimating mobile source GHG emissions associated with the facility.

*Comment TRAO-81*

The comment requests that a Hazardous Waste Disposal Plan be prepared and implemented by a Hazardous Waste Disposal Compliance Monitor. The comment goes on to list numerous measures to be included in or required by the plan. However, the analysis in the EIR does not support the need for these suggested measures, is not supported by substantial evidence or expert opinion and do not reflect the clear recommendations provided in the EIR – particular because neither the City of Redondo Beach, the City of Torrance, nor any the environmental regulatory agency commented on the mitigation measures that were identified in Section 3.8, *Hazards and Hazardous Materials*. The commenter does not explain why the suggested measures would be more appropriate than MM HAZ-1, which would require asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mold surveys, and MM HAZ-2a through -2d, which would require the preparation of a soils management plan, soil vapor monitoring, the use of soil vapor extraction equipment, and the procedures that would be followed in the event that previously unknown or unidentified soil or groundwater contamination is encountered. As stated in the EIR, compliance with these mitigation measure would involve review and approval by the Redondo Beach Building & Safety Division and the City of Torrance Building & Safety Division as well as other relevant agencies include the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and Los Angeles Regional Water Quality Control Board (RWQCB). Additionally, all surveys and disposal activities would be carried out by a licensed contractor(s). A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment TRAO-82*

This comment provides a lengthy description of the pilot program that is being implemented by the City of Torrance to explore the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street. As described in the comment, if approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project.

The potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, is fully described and discussed in the EIR, as is demonstrated by the citations to the EIR provided in the comment. As discussed in the response to Comment TRAO-53, if the trial removal of the southbound vehicle movement along Flagler Lane is made permanent, it would conflict with and eliminate the use of the service access along Flagler Lane. This is one of the reasons that Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce

Parking Structure, and Alternative 6 – Reduced Height Alternative each consider an alternative access and circulation scheme that eliminates the proposed vehicle access on Flagler Lane.

Contrary to the assertion that the possibility that the City of Torrance may make changes in vehicle travel on Flagler Lane makes the description of the proposed Health Living Campus Plan unstable, this potential action by another agency is acknowledged in the EIR and supports the analysis of alternative access and circulation schemes for consideration by the public and the decision-makers.

*Comment TRAO-83*

The comment states that the EIR must identify the minority stakeholder rights of any development agreement, given the purposed risks inherent and the potential for diminishment and loss of assets. This is not a comment on the adequacy of the environmental impact analysis provided in the EIR. These financial issues do not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

*Comment TRAO-84*

This comment provides a lengthy summary of the design-build process and cites an article from the Golden Gate University Environmental Law Journal that appears to argue for the amendment of CEQA to: 1) make all design-build projects subject to a publication requirement for post-CEQA-approval design and construction changes; and 2) require an oversight and review committee to make recommendations for supplemental environmental review. This publication contains a legal argument that suggests the need for amendments to CEQA that have not been adopted by the Legislature. In addition, the examples provided in this publication are for high-speed rail projects – particularly the California High-Speed Rail Network, for which the California High Speed Rail Authority is responsible for regulating construction activities. Therefore, this comment is not germane to the adequacy of the EIR under CEQA as it is currently drafted.

The comment also fails to acknowledge the differences between the required approvals for the proposed Health Living Campus Master Plan and the State's high-speed rail project. Unlike the design build process for the California High-Speed Rail Network, the proposed Health Living Campus Master Plan would be subject to approvals by responsible agencies include the City of Redondo Beach and potentially the City of Torrance (refer to Section 1.5, *Required Approvals*). Following the adoption of the proposed Project, BCHD would be required to obtain a CUP from the City of Redondo Beach, and final designs would be subject to Redondo Beach Planning Commission Design Review in compliance with the Community Facility (P-CF) zoning for the Project site as established in RBMC Section 10-2.1116 and TMC Section 13.9.7. Therefore, subsequent reviews and approvals would be required and, in compliance with CEQA Guidelines

Section 15162, any substantial changes to the proposed Project would be evaluated to determine whether they would result in a new significant environmental effect or a substantial increase in the severity of a previously identified significant effect. If so, and depending to what extent, a Subsequent EIR (CEQA Guidelines Section 15162), a Supplemental EIR (CEQA Guidelines Section 15163), or an Addendum (CEQA Guidelines Section 15164) to the previously prepared EIR may be required.

*Comment TRAO-85*

This comment asserts that BCHD has violated the Los Angeles Local Area Formation Commission (LAFCO) restrictions. This is not a comment on the adequacy of the environmental impact analysis provided in the EIR. However, it should be noted that the proposed Project does not propose to expand or otherwise change BCHD's sphere of influence. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue to use this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

*Comment TRAO-86*

The comment asserts that the No Project Alternative must be clarified to describe whether it would result in demolition and replacement with open space or no redevelopment. For context, pursuant to CEQA Guidelines Section 15126.6(e)(1), *"[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project."* Pursuant to CEQA Guidelines Section 15126.6(e)(2), *"[t]he 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."*

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building

maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is "*reasonably expected to occur in the foreseeable future"* clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District and substantially reducing public health service available to Beach Cities residents and even those of the South Bay. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of

theses existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion of the Project site. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

*Comment TRAO-87*

This comment states that the No Project Alternative should evaluate reduced services. However, as described in the response to Comment TROA-86, the potential reduction in services is already adequately described for CEQA purposes. As described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings.

However, given the continued escalation of maintenance costs that are beginning to outpace revenue, it would be neither reasonably foreseeable nor responsible for BCHD as a public agency with fiduciary obligations to taxpayers to continue operating the campus until financial insolvency.

*Comment TRAO-88*

The comment suggests additional alternatives, which are addressed in detail in the responses to Comments TRAO-89 through TRAO-97.

*Comment TRAO-89*

This comment claims that almost all BCHD objectives do not have merit. However, this comment represents the commenter's opinion and does not reflect the extensive deliberations that BCHD has engaged in regarding the project objectives and the substantial technical and financial analysis that have informed these deliberations. Refer to the response to comment TRAO-6 regarding the purpose and need for the seismic retrofit.

The comment states that BCHD should consider a seismic retrofit, if and when it is needed. However, the comment fails to acknowledge the relationship of the required maintenance activities to the seismic issues as well as the fact that the No Project Alternative does not propose immediate demolition. The No Project Alternative describes that BCHD would continue to operate the Beach Cities Health Center and the Beach Cities Advanced Imaging Building until it becomes financially

infeasible to do so. As described in the response to Comment TRAO-86, during this time BCHD would continue to monitor the structural stability of these buildings. As described under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, only then BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center.

*Comment TRAO-90*

The comment claims that the project objectives related to revenue generation have been included for BCHD to stay in business. As described in detail in the EIR, revenue generated by the proposed Healthy Living Master Plan would permit BCHD to continue to provide high-quality community health and wellness service to tens of thousands of residents in the Beach Cities and even the greater South Bay. Financial insolvency of BCHD would deprive residents of these services. As discussed in the response to Comment TRAO-10, the project objectives acknowledge that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs. A quantitative analysis of BCHD's services can be found in the Community Health Report (https://www.bchd.org/healthreport) as well as the Priority-Based Annual Budgets (https://www.bchd.org/operating-budgets).

*Comment TRAO-91*

The comment claims, without support of expert opinion or technical studies and in conflict with substantial evidence in the record, that the need for assisted living with on-site facilities is not

growing. Refer to the response to Comment TRAO-13 as well as Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. Additionally, as described in Master Response 6 – Financial Feasibility/Assurance, BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study.

*Comment TRAO-92*

The comment claims that the only two objectives that resonate with community desires include creating public open space and reducing expenses. However, the comment reflects the commenter's opinion and does not reflect the existing demand for BCHD programs and services. Further the comment conflates parkland and open space when it asserts that the open space described for the proposed Healthy Living Campus Master Plan violates the RBMC. The comment appears to imply that a zoning change to P-PRO would be required. The project objective identified in the comment clearly describes open space, which is a use that is consistent with the land use designation and zoning (P-CF) of the existing campus which permit recreational facilities and open space and accessory use/structures (e.g., storage shed, maintenance building, concession stands, etc.) pursuant to RBMC Section 10-2.1110. The comment also states that the proposed Healthy Living Campus Master Plan would violate the RBMC with regard to building density, height, and number of stories. This comment is incorrect because the design of the proposed Project is consistent with the requirements for P-CF and C-2 zoning and land use designations.

As described in the response to Comment TRAO-14, open space on the campus would be publicly accessible and would not be privately owned. With regard to community events within the publicly accessible open space, all applicable permits would be obtained from the City of Redondo Beach, as necessary. Consistent with MM NOI-3b, an Events Management Plan would be prepared and implemented to ensure consistency with the Redondo Beach and Torrance noise ordinances.

*Comment TRAO-93*

The comment asserts that the CHF and Adventureplex are self-sustaining and therefore self-sufficient and demonstrate the satisfaction of a public need. This is not a comment on the adequacy of the environmental analysis provided in the EIR. Refer to the responses to Comment TRAO-10

and TRAO-12 regarding the project objectives described for the proposed Healthy Living Campus Master Plan.

*Comment TRAO-94*

The comment asserts that as the use of the lease space within the Beach Cities Health Center declines over time the parking requirement at the campus would also decline, allowing for the development of parkland. While parkland is clearly valuable, this comment ignores BCHD's central mission which is provision of community health and wellness services which is dependent upon revenue from the campus, BCHD's primary asset. The comment lists alleged expenses for BCHD to operate as a reduced organization, but does not provide a citation for these figures. In addition, the comments fails to acknowledge that BCHD would still be responsible for maintaining the Beach Cities Health Center and its remaining occupants. While the comment suggests that large portions of the building be mothballed, it fails to acknowledge that the building's utilities are not confined to certain portions or wings of the building. For example, water lines, electrical lines, natural gas lines, structural components of the building, etc. would all still require maintenance throughout the building to ensure that the lease spaces in other portions of the building are in good working order. This comment also fails to acknowledge the seismic stability issues associated with the building, which contributes to the underlying need to redevelop, rather than renovate, the Beach Cities Health Center. As described for Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) and Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus, BCHD would not continue operating the campus until financial insolvency caused by increasing maintenance costs and reduced revenues.

Lastly, with regard to the development of parkland, BCHD is a California Healthcare District with a focus on health and wellness programs and services. Accordingly, the project objective related to open space is specifically to provide sufficient public open space to accommodate programs that meet community health needs. Although BCHD provides some health-related recreational services (e.g., fitness classes), it is not primarily a recreational service provider and the construction of parkland consistent with RBMC Section 10-2.1117 neither falls within the mission of BCHD nor meets the identified project objectives.

*Comment TRAO-95*

The comment provides a lengthy discussion suggesting that the EIR consider an alternative that would reduce expenses. First it is important to reiterate that CEQA requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant*

*effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potentially significant physical adverse environmental effects of the proposed Project (CEQA Guidelines Section 15358[b]). The comment appears to relate primarily to the financial operation of BCHD, however, and suggests the elimination of funds and grants, reductions in salaries, reduction in programming, increases in fees for services, etc.

Pursuant to CEQA Guidelines Section 15126.6(e)(2), the EIR examines Alternative 1 – No Project Alternative (Demolish and Replacement with Open Space). This alternative describes the *"what would be reasonably expected to occur in the foreseeable future"* if the proposed Project were not implemented. Thus, the description of the No Project Alternative explains that BCHD that would continue Community Services, CHF, Beach Cities Silverado Memory Care Community, and other tenant operations (e.g., outpatient medical office) within the Beach Cities Health Center. Additionally, tenant operations (e.g., outpatient medical office) would continue within the Beach Cities Advanced Imaging Building and the Providence Little Company of Mary Medical Institute Building. BCHD would continue to provide building maintenance as required (refer to the response to Comment TRAO-94). However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings.

Accordingly, the alternative addresses the strategies that are called for in the comment; however, the comment does not acknowledge that there would eventually be a critical point at which maintenance costs could not be sustained, regardless of the cuts to services, with associated potential adverse effects on public health and wellness for BCHD's service population. At that point, under the No Project Alternative, BCHD would either require a local bond to facilitate improvements or would be required to consider sale of the campus or eventual demolition due to the deferred maintenance and seismic safety hazards.

*Comment TRAO-96*

The comment cites CEQA Guidelines Section 15126.6(a) and states that alternative locations should be considered. The comment goes on to claim that the EIR presents excuses for why the land west of the AES Redondo Power Plant was dismissed from further consideration. However, the discussion in the EIR provides clear discussion of the barriers of completing the Project on alternative sites and meets the requirements of CEQA Guidelines Section 15126.6(f), which states

that *"[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project."* Specifically, CEQA Guidelines Section 15126.6(f)(2)(B) requires that *"[i]f the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR."* As an example, the discussion explains that the AES Redondo Beach Power Plant site is large enough, but is zoned as P-GP and would not allow for medical office and health-related facilities, or residential care facilities. BCHD could apply for a zoning change, but pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. For example, AES Redondo Beach LLC finalized the sale of the power plant site to a private developer in March 2020. The new owner of the site is currently considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. As described in CEQA Guidelines Section 15126.6(f)(3), *"[a]n EIR need not consider an alternative…whose implementation is remote and speculative."*

*Comment TRAO-97*

The comment states that BCHD should consider the use of a ballot bond measure for seismic retrofit funding. Refer to the response to Comment TRAO-94, which discusses potential actions that would be taken under the No Project Alternative.

*Comment TRAO-98*

The comment raises general issues about the assessment of cumulative impacts, which are already addressed in detail throughout the EIR and in the responses to Comments TRAO-99 through TRAO-106.

*Comment TRAO-99*

The comment states that the EIR omits the BCHD Bike Pathway Project and the redevelopment of the AES Redondo Beach Power Plant as cumulative projects.

With regard to the BCHD Bike Pathway Project, it is not listed in the Table 3.0-1 because it is not a planned, pending, or approved Project by the City of Redondo Beach. Given BCHD's involvement in the design of the BCHD Bike Pathway Project, it is acknowledged in the EIR, where appropriate. For example, Section 3.14.1, *Environmental Setting* states that, separately from

the proposed Project, BCHD is currently working with the City of Redondo Beach and the City of Torrance to plan a new protected (i.e., Class I) bicycle facility (BCHD Bike Path Project) along the eastern perimeter of the campus along Flagler Lane and Flagler Alley between the northern terminus of Flagler Alley and Beryl Street. The EIR also includes a discussion of the BCHD Bike Path Project in the cumulative impacts discussion in Section 3.14, Transportation. which explains that the BCHD Bike Path Project (separate from the proposed Project) would develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street. The expansion of the regional bikeway network in the cities of Redondo Beach, Torrance, and Hermosa Beach would achieve the overall goal of the South Bay Bicycle Master Plan and would align with BCHD's mission to promote health and well-being. The proposed Project would not preclude the development of the BCHD Bike Path Project or otherwise result in a substantial contribution to cumulatively considerable impacts related to transportation plans and policies. Refer to the response to Comment TRAO-76.

The AES Redondo Beach Power Plant is still in operation through 2021. As described in the response to Comment TRAO-96, AES Redondo Beach LLC finalized the sale of the site to a private developer in March 2020; however, the new owner of the site is still considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. Potential redevelopment concepts at this site are currently unknown and it would be speculative to discuss further. The potential redevelopment of the AES Redondo Beach Power Plant is accordingly not a planned, pending, or approved Project by the City of Redondo.

*Comment TRAO-100*

The comment incorrectly claims that the BCHD Bike Path Project is a part of the proposed Health Living Campus Master Plan. As described in the response to Comment TRAO-76, the BCHD Bike Path Project is described as separate project given that it is grant-funded, on a separate and distinct timeline, and can be implemented with or without the proposed Healthy Living Campus Master Plan. The BCHD Bike Path Project was originally described as a part of the proposed Healthy Living Campus Master Plan because the two projects were on concurrent schedules; however, due to grant funding requirements and delays in planning for the Health Living Campus Master Plan, these schedules were decoupled. Implementation of the BCHD Bike Path Project does not depend on approval of the Healthy Living Campus Master Plan, or vice versa; therefore, analyzing the BCHD Bike Path Project in the cumulative impacts analysis, as discussed below, does not constitute piecemealing.

The cumulative impact discussion considers the potential for cumulative safety impacts related to the BCHD Bike Path Project. Specifically, the analysis describes that implementation of the Class

II bicycle lane along Flagler Alley and segments of Flagler Lane and Diamond Street would be designed in consideration of the proposed Project design features to protect pedestrians and bicyclists along the Class II bicycle lanes as they cross Towers Street. Further, as with the proposed Project, each of the cumulative projects would be subject to site plan review and would meet local street design and access requirements. Therefore, implementation of the proposed Project would not result in a substantial contribution to cumulatively considerable impacts related to design features.

*Comment TRAO-101*

The comment states the EIR must describe the cumulative impacts of the proposed Project and the Redondo Beach Police Department Shooting Range Upgrade on Towers Elementary School. The Police Department Shooting Range is identified as a cumulative project (refer to Table 3.0-1). This cumulative project is specifically referenced in the cumulative aesthetics and the cumulative hazards and hazardous materials analyses given the proximity of the site to the campus. As described in the cumulative impact analysis within Section 3.11, *Noise*, the proposed campus would be required to comply with the Redondo Beach and Torrance noise regulations and would not result in a potentially significant impact due to operational noise. Neither publicly available designs nor CEQA documentation for the Police Department Shooting Range were available at the time of the preparation of the EIR. Therefore, a quantitative noise analysis for the proposed shooting range was not available. Nevertheless, given that the proposed Project would comply with the requirements of the City of Redondo Beach and the City of Torrance noise ordinances, including all maximum permissible sound level requirements by land use type, the proposed Project would not substantially contribute to a cumulatively considerable noise impact.

*Comment TRAO-102*

The comment incorrectly claims that the EIR does not address the extent to which implementation of the proposed Project could have a cumulative effect on public services in the context of SCAG's regional growth forecasts. First, as discussed for the proposed Project, the incremental increases in demand for public services would almost entirely be limited to public services provided by the City of Redondo Beach. Second, the cumulative impact discussion clearly describes the magnitude of the contribution. For example, the analysis of cumulative impacts for fire protection services describes the number of cumulative housing projects that are planned pending or approved in the City of Redondo Beach, calculates the potential residential population increase associated with those housing projects, and provides this as context to describe the magnitude of the potential contribution of the proposed Project to a cumulative impacts on Emergency Medical Service (EMS) response. The assertion that the proposed Project would substantially contribute to a

cumulative impact on public services provided throughout the six counties making up the SCAG is unfounded. As described in Section 3.13, *Public Services* the magnitude of the potential contribution to cumulative impacts is described for each of the public services analyzed in the EIR would be minor, or even negligible.

*Comment TRAO-103*

The comment asserts that the redevelopment of the AES Redondo Beach Power Plant should be evaluated as a cumulative project. Refer to the response to Comment TRAO-99 for a detailed discussion and response to comments pertaining to this issue.

*Comment TRAO-104*

This comment claims that the analysis fails to assess the cumulative impacts of the proposed Project on the Redondo Beach Historical Museum and the Morrell House, which are located in Dominguez Park. However, the comment is inaccurate and the EIR does address such potential cumulative impacts in Section 3.4, *Cultural Resources*. This analysis appropriately describes both of these buildings, which have been previously determined to be Redondo Beach Landmarks in accordance with the criteria described in the Redondo Beach Historic Ordinance (Ord. No. 2554). Potential impacts to historic built resources can include physical damage or the loss of character defining features and alteration of the historic setting. As described in Section 3.11, *Noise*, redevelopment of the campus would not result in substantial ground-borne vibration that could physically damage either of the two nearby historic buildings (refer to Section 3.11, *Noise*). With regard to their historic setting, both the Morell House and Queen Anne House were relocated to their current location in Dominguez Park in the late 1980s. As such, these buildings were previously removed from their original historic settings and context. Also, the area surrounding the current location of Morell House and Queen Anne House has been substantially redeveloped over the years with the construction former South Bay Hospital, Redondo Village Shopping Center, and other surrounding uses including Dominguez Park, which was formerly a landfill that was operated from 1904 to 1967. The existing surrounding development, including the Project site, does not contribute to the character-defining features that establish of the Morell House and Queen Anne House as Redondo Beach Landmarks; therefore, no impact  and the Project would occur.

*Comment TRAO-105*

The comment notes minor inconsistencies in distances measured between the Project site and the location of nearby cumulative projects. These discrepancies are small errors in estimation. For example, the comment states that Section 3.11, *Noise* describes the Morrell House and Queen Anne house at a distance of 600 feet, while Section 3.4, *Cultural Resources* describes these

properties at a distance of 650 feet and 750 feet respectively. These minor discrepancies have no material effect on the description of potential cumulative impacts, which are discussed in the response to Comment TRAO-104, and the text will be revised in the Final EIR to make this correction. The commenter also asserts that the EIR describes the former Redondo Beach Police Department shooting range as being located 1 mile from the Project site, but this misstates the Section 3.8, *Hazards and Hazardous Materials*, which clearly describes the Redondo Beach Police Department shooting range as an off-site property located *"within"* 1 mile of the Project site (i.e., the search radius for potentially hazardous sites).

*Comment TRAO-106*

The comment asserts that the proposed Aquatics Center has not been identified in the project objectives. However, this component of the proposed Project does not need to be further enumerated in the project objectives. Refer to CEQA Guidelines Section 15124(b), which states that the project objectives *"should include the underlying purpose of the project."* Moreover, the proposed Aquatic Center help attain a number of the project objectives. For example, it is a facility that is *"designed to meet the future health needs of residents."* For a detailed discussion regarding the Los Angeles Local Area Formation Commission Restrictions refer to the response to Comment TRAO-85.

*Comment TRAO-107*

The comment suggests that the EIR does not assess the potential impacts of a swimming pool on EMS services and cites potential permanent injuries due to drowning, ingestion of toxic chemical, and increases in water-borne illnesses. However, operation of public pools are subject to clear and strict state regulations with regards to public safety. Additionally, Section 3.13, *Public Services* acknowledges that operation of the proposed BCHD Healthy Living Campus would result in an increase in residents, employees, and visitors at the campus, and could result in incremental increases in Redondo Beach Fire Department (RBFD) responses. The analysis calculates the projected number of EMS responses for the proposed Assisted Living program and Memory Care community residents because specific data was available from the Silverado Beach Cities Memory Care Community. The analysis more generally describes potential demand associated with employees and visitors, and notes that they would not measurably affect the ratio of firefighters to residents or adversely impact response times. The RBFD has the existing required assets to respond to emergencies at the existing Beach Cities Health Center. The proposed Project would redevelop the existing campus, which is in close proximity (<1.2 miles) to RBFD's three Fire Stations. Because response times to the existing campus are satisfactory and the proposed Project would only incrementally increase the demand for RBFD services, the proposed Project would continue

to be located well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the RBFD and would not require new or physically altered RBFD facilities.

With regard to the assertions that the proposed Aquatics Center would lead to water-borne illnesses, these suggestions are highly speculative. and ignore the fact that public pools exist throughout the South Bay and are subject to clear and strict state regulations with regards to public safety. The proposed Aquatics Center would be governed by all applicable rules and regulations, and would be subject to City health inspections.

With regard to the commenter's assertion that the EIR does not analyze construction impacts associated with the proposed Aquatics Center, the comment ignores that EIR's extensive discussion of construction-related activities and impacts. Construction-related activities associated with Phase 2 are described in Section 2.5.1.6, *Construction Activities*. The proposed construction of this facility is clearly included in each of the construction-related impact discussions, including the quantitative analysis of impacts described in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*.

*Comment TRAO-108*

This comment asserts that the implementation of the proposed Healthy Living Campus Master Plan will fail finically and that BCHD does not have the management experience needed. As noted in multiple responses to comments above, the financial viability of the proposed Project has been subject to multiple technical reports and open public discussion by the BCHD Board of Directors; further, finances and economics are not the focus of CEQA and CEQA Guidelines Section 15131 prohibits analysis of economic issues. For a detailed discussion and response to comments on such issues refer to Master Response 6 – Financial Feasibility/Assurances. This comment does not relate to the focus of the review of EIRs in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* Although these comments do not address the adequacy of the EIR, as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment TRAO-109*

This comment claims that the true purpose of the proposed Health Living Campus Master Plan is not disclosed in the EIR and suggests that the intent of the proposed Project is to generate revenue. Refer to the responses to Comments TRAO-6 through TRAO-10, which address issues related to

the project objectives. Refer also to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives. As stated in these other responses, the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. Accordingly, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the implementation of the proposed Healthy Living Campus Master Plan.

*Comment TRAO-110*

The comment claims that the EIR overstates the need for the proposed Assisted Living program. For a detailed discussion and response to comments refer to the response to Comment TRAO-13 and Master Response 3 – Project Need and Benefit. As described in the response to Comment TRAO-13, BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. Field work and analysis were originally completed in April 2016 and updated in August 2018 and May 2019 to reflect the changed number of proposed housing units. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 updated market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards and if the conclusions and demand estimates were reasonable. Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. The assertion that there is not a demand for Assisted Living in the Beach Cities is unfounded. It should be noted that the proposed Project would also provide a PACE program. As described in Section 2.5.1.1, *Proposed Uses,* PACE is a Medicare and Medicaid program that provides comprehensive medical and social services older adults (i.e., age 55 and older with an average age of 76). PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.)

coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. For most participants, PACE services would enable them to remain in the community rather than receive care in a nursing home or other elder care facility.

*Comment TRAO-111*

The comment states that EIR does not provide an analysis of real estate value depressions. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, CEQA requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15131, cited in the comment, specifically states that *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."* CEQA Guidelines Section 15131(b) gives the example of *"[c]onstruction of a road and the resulting increase in noise in an Area [that] disturbed existing religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment."* Potential loss of property value in and of itself is a not physical impact required to be evaluated in a CEQA environmental review document. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

The EIR does not identify significant impacts related to visual character or shade and shadows (refer to Impact VIS-4 in Section 3.1, *Aesthetics and Visual Resources*). While the EIR does identify significant and unavoidable construction-related noise impacts, these temporary, but prolonged impacts would only affect on-site sensitive receptors and sensitive receptors immediate adjacent to the campus. The proposed Project would not have a significant and unavoidable impact

on Towers Elementary School or Beryl Heights Elementary School as the comment suggests (refer to Table 3.11-16 and Table 3.11-17 in Section 3.11, *Noise*).

*Comment TRAO-112*

The comment asserts that the EIR does not discuss the environmental impact of construction contract failure. However, the EIR provides detailed discussion of construction-related activities and impacts and the financial viability of the proposed Project has been analyzed in multiple studies and discussed in open public meetings. For a detailed discussion and response to comments pertaining to the financial viability of the proposed Project refer to Master Response 6 – Financial Feasibility/Assurance. These issues are not directly associated with the physical impacts on the environment. Further, concerns that BCHD would be unable to fund the proposed Project, that the proposed Project would fail financially, or that that foreclosure of the property and inability to complete the proposed Project following initiation of construction activities would result in environmental damages and loss of public land are unsubstantiated and speculative. CEQA Guidelines Section 15384[a] states that *"[s]ubstantial evidence does not include 'argument, speculation, unsubstantiated opinion or native, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are caused by physical impacts on the environment.'"*

The EIR does evaluate a No Project Alternative, however, which would result in the eventual demolition of the Beach Cities Health Center as well as an alternative that considers closure, sale, and redevelopment of the campus. The assertion that a partially developed project would exist into perpetuity resulting in damage to aesthetics, accidents and injuries, occupation by homeless individuals or criminals, or the promotion of illegal activities is highly speculative and unreasonable.

*Comment TRAO-113*

This comment references CEQA Guidelines Section 15064.3, which states that *"[a]ny assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project."* The comment then goes on to describe that TDM strategies must consider impacts on sensitive individuals and requests a discussion of potential impacts of temporary, but prolonged construction-related traffic. However, as discussed in further below, the EIR and supporting technical analyses provide detailed descriptions of these issues.

In accordance with CEQA Guidelines Section 15064.3, the assumptions used to estimate VMT are described in Section 3.14, *Transportation* as well as in Appendix K. The scope and methodology

of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis.

With regard to TDM strategies, it is important to note that the EIR did not identify a potentially significant impact to VMT. A TDM plan is included as a recommended mitigation measure that provides additional information on the proposed TDM measures pursuant to the requirements of RBMC Section 10-2.2406. The implementation of this recommended mitigation measure would further reduce an already less than significant impact. The TDM plan would encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being (refer to the response to Comment TRAO-45).

Temporary, but prolonged construction-related transportation impacts, including potential associated safety impacts are thoroughly discussed under Impact T-3 in Section 3.14, *Transportation*. Implementation of MM T-2 would require the preparation of a Construction Traffic and Access Management Plan, which would require review and approval, in addition to BCHD, by the County Department of Transportation and the Redondo Beach Community Development Department. This plan would include implementation of robust public notification as well as traffic control procedures (e.g., temporary signage, construction flaggers, etc.).

For a detailed discussion and response to comments on the potential impact of construction-traffic on nearby schools, refer to Comment Response KB-3. As described therein, TUSD has acknowledged in the comment that these revisions would reduce potential impacts at Towers Elementary School and eliminate potential impacts and Magruder Middle School. BCHD has incorporated these suggested revisions in keeping with MM T-2, which requires that the proposed haul routes are "*consistent with the Redondo Beach and Torrance General Plan designations.*"

*Comment TRAO-114*

The comment recounts an example of potential dust impacts at Gateway Element School in St. Louis, Missouri. As noted in multiple responses above, the EIR employs sophisticated computer modeling to exhaustively analyze construction-related criteria air pollutant emissions impacts, including fugitive dust. For a detailed discussion and response to comments pertaining to fugitive dust emissions, refer to Master Response 10 – Air Quality Analysis. MM AQ-1 requires the preparation and implementation of an Air Quality Management Plan for project construction, which shall be approved by the City of Redondo Beach and the City of Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or

the Phase 2 development program. CEQA Guidelines Section 15097 requires that the lead agency adopt a MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment TRAO-115*

The comment incorrectly states that there will be close to 10,000 truck trips during the AM and PM peak hours. The EIR states in numerous locations that *"soil excavation and export would involve up to 1,250 haul truck trips over a 1-month period. This average soil export rate may be increased or decreased depending on availability of haul trucks during the construction period as well as the rate of shoring installation."* The Construction Traffic and Access Management Plan required by MM T-2 limits work within the public right-of-way to the period between 9:00 a.m. and 4:00 p.m.. which applies to dirt and demolition material hauling and construction material delivery. As such, construction-related truck traffic would not occur within the AM or PM peak hours.

*Comment TRAO-116*

This comment restates that impacts to school children's safety must be analyzed and mitigation must be implemented. Refer to the response to Comment TRAO-113.

*Comment TRAO-117*

The comment incorrectly claims that the number of intersections operating at LOS E or LOS F would increase from five to seven with the implementation of the proposed Project. Impacts to intersection operations as measured by LOS is no longer considered a CEQA impact. Refer to the response to Comment TRAO-43 for a detailed discussion and response to comments pertaining to this issue. While this comment correctly notes that seven intersections would operate at LOS E or F at one or both of the peak hours, the comment fails to acknowledge that the intersections would operate at these conditions without the proposed Project as described for the Cumulative (2032) Baseline condition. In fact, implementation of the proposed Project would result in a minor reduction in the V/C ratio or intersection delay for the AM and PM peak hour at each of these intersections, with the exception of the intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street. This is due to the minor reduction in peak hour trips associated with the proposed Project. The intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl

Street would experience a minor increase in the V/C ratio or intersection delay due to the redistribution of trips associated with the proposed Project; however, as with each of the other intersections evaluated in the Non-CEQA Intersection Operational Evaluation, these minor increases in V/C ratios or intersection delays would not exceed the non-CEQA thresholds of evaluation for the City of Redondo Beach or the City of Torrance.

*Comment TRAO-118*

The comment requests that health impacts on children traveling to and from school or on playgrounds be analyzed in the air quality analysis. The EIR already provides a detailed assessment of human health risk during construction. As described in the response to Comment TRAO-28, the construction HRA, which was prepared for the purpose of assessing the health risk associated with air emissions during construction, conservatively quantifies cancer risk and non-cancer chronic health effects at the PMI and for the MEIR. The PMI is the location where the cancer risk or non-cancer chronic health effect is at the maximum level, regardless of the presence of a human receptor at that location. No concentration higher than the concentration at the PMI would occur from the proposed construction activities. The dispersion modeling was conducted to estimate ground-level DPM concentrations for the PMI, MEIR, Towers Elementary School, Beryl Heights Elementary School, and residents living at the Silverado Beach Cities Memory Care Community and at the proposed RCFE Building that would be constructed during Phase 1 of the proposed Project. Health risk calculations were performed using the OEHHA methodologies and exposure parameters (including age sensitivity factors) as well as the corresponding SCAQMD guidance documents. As described in detail within the EIR and the construction HRA, with implementation of all required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts to sensitive receptors would be less than significant when compared to the SCAQMD thresholds for criteria pollutant emissions and the CARB thresholds for TACs.

*Comment TRAO-119*

The commenter claims that the EIR does not address construction parking. The courts have reaffirmed that parking shortfalls compared to demand represent an *"…inconvenience to drivers, but are not a significant physical impact on the environment."* (San Franciscans Upholding the Downtown Plan v. City and County of San Francisco ["SFUDP"] [1st Dist. 2002] 102 Cal.App.4th 656, 697). Rather the EIR must *"fulfill its CEQA-mandated purpose by identifying ways in which the secondary environmental impacts resulting from the project parking"* and identifying ways in which those impacts *"could be mitigated."* Following this decision, the Appendix G of the CEQA Guidelines was revised to delete from its Transportation/Traffic section the question: *"Would the project…[r]esult in inadequate parking capacity?"*

The EIR clearly identifies the potential impacts related to temporary, but prolonged construction-traffic impacts under Impact T-2 in Section 3.14, *Transportation*. The EIR acknowledges that construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the vicinity of the Project site would be potentially significant. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would identify designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the L.A. County – Department of Transportation Area Traffic Control Handbooks. With the implementation of MM T-2, construction-related hazards – including hazards associated with construction parking – would be reduced to less than significant with mitigation.

*Comment TRAO-120*

The comment raises concerns about the number of boring locations and the results of the Phase II Environmental Site Assessment (ESA). The comment also contends that the known contamination on-site could result in health impacts that have not been addressed by BCHD. However, the EIR already thoroughly discloses and discusses the existing conditions regarding contamination on the Project site, which was informed by the completion of Phase I and Phase II ESAs. Refer to Master Comment Response 11 – Hazards and Hazardous Materials for a detailed description of these studies. The Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants. Three of the screened contaminants were detected in excess of their residential screening levels: tetrachloroethylene (PCE), benzene, and chloroform. All three of these contaminants are classed as VOCs. No further soil boring sampling, which was requested by some commenters, is necessary because the presence of contaminants has already been identified.

While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, *Hazards*

*and Hazardous Materials*). Implementation of MM HAZ-2a through -2d would ensure that PCE and the other identified VOCs are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through -2d impacts would be less than significant.

With regard to long-term remediation activities, as described in Section 3.8.1, *Environmental Setting*, BCHD notified the LACoFD Health Hazardous Materials Division and the Los Angeles RWQCB of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the CUPA for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup.

*Comment TRAO-121*

This comment claims that the plan for excavation and grading control is incomplete. The comment requests that the City of Redondo Beach and the City of Torrance review and approve excavation activities. This requirement is discussed in Section 1.5, *Required Approvals*, which identifies the need for grading permits from the Redondo Beach Building & Safety Division as well as the Torrance Engineering Division. Prior to issuance of any such approvals, both cities would be required to review the proposed grading plans. BCHD also would be required to comply with any permit conditions related to excavation and grading operations.

The comment also states that the EIR must evaluate the potential for soil liquefaction and address the potential for crude oil escaping from the previously plugged and abandoned oil and gas well on the vacant Flagler Lot. The issue of liquification is addressed in detail under Impact GEO-1 in Section 3.6, *Geology and Soils,* which explains that the Project site is not located within a designated liquefiable area mapped by the State or the Redondo Beach Local Hazard Mitigation Plan Liquefaction Zones Map. The Geotechnical Report prepared for the proposed Project categorizes the underlying soils as silty and clayey sands with low risk of liquefaction. Therefore, required compliance with the California Building Code (CBC) would ensure that potential impacts associated with liquefaction would be less than significant. Issues related to the previously plugged and abandoned oil and gas well are addressed under Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials.* As described therein, Total Petroleum Hydrocarbons (TPH) in the heavy oil range were detected in two samples at boring locations within the vacant Flagler Lot. These concentrations are most likely related to the abandoned oil and gas well located at this site;

however, they are well below the Department of Toxic Substances Control (DTSC) and USEPA residential screening level and do not represent a potential hazard to the environment or public health. Terra-Petra Environmental Engineering (Terra-Petra) excavated the well to physically locate it and complete a leak test, which was negative (i.e., no leaks were detected). Terra-Petra has prepared a summary report, which has since been shared with CalGEM, the responsible oversight agency. BCHD has enrolled into the CalGEM Well Review Program, pursuant to MM HAZ-3, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to avoid future liabilities.

*Comment TRAO-122*

The comment asserts, without regard to extensive discussion, analysis and supporting technical studies in the EIR, that the precise location of the abandoned oil well is unknown and must be identified because it affects the design of the proposed Project. Contrary to this assertion, BCHD has spent considerable time and effort to identify the precise location of the well, which is described in detail in Section 3.8, *Hazards and Hazardous Materials*. The comment summarizes many of the steps that were taken to identify the location of the oil and gas well, beginning with its identification in the Phase I ESA. These steps included preparation of a Phase II ESA, review of aerial photographs, and excavation activities, all of which were conducted by Converse Consultants. When Converse Consultants was unable to identify the precise location of the well, BCHD contracted with Terra-Petra to prepare a geophysical survey of the site. This survey identified a magnetic anomaly suspected to be the oil and gas well, which was identified approximately 30-feet east of the western fence boundary and approximately 30 feet north of the toe of the slope at the vacant Flagler Lot. As described in the response to Comment TRAO-121 Terra-Petra then excavated this location, physically identified the well, and completed a leak test. Terra-Petra has prepared a summary report, which has since been shared with CalGEM, the responsible oversight agency.

As described under Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials,* the proposed Project has been designed to comply with all applicable CalGEM recommendations including avoiding construction of permanent structures in close proximity to a well. CalGEM defines *"close proximity"* as being within 10 feet from a well. Refer to Master Comment Response 11 – Hazards and Hazardous Materials for a detailed discussion and response to comments pertaining to the previously plugged and abandoned oil well.

With regard to the reference in the comment to the description of potential impacts to mineral resources, the Initial Study provided in Appendix A correctly identifies that no impact to mineral

resources would occur because there are no active mining operations on the Project site and the site is not identified as a designated mining site in the City of Redondo Beach General Plan.

*Comment TRAO-123*

The comment claims that the number of estimated EMS requests is understated and asserts that the true number of calls will be at least doubled because they should be calculated per unit, not per bed. As described in Section 3.13, *Public Services* previous records indicate that a total of 451 EMS calls associated with the campus at 514 North Prospect Avenue occurred between January 2015 and July 2019, with an average of 98 calls per year, which is just over 8 calls per month for the 60 double-occupancy Memory Care units with 120 beds total. For reference, this is similar to the 85 calls per year assumed in the Draft EIR prepared for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 203121065). Based on these data, a factor of 0.82 annual calls per bed space per year was used to estimate the EMS requests associated with the proposed Assisted Living program and Memory Care community. Implementation of Phase 1 of the proposed Project would relocate the 60 existing double occupancy Memory Care units (120 bed spaces) and develop 157 new Assisted Living units (177 new bed spaces), resulting in a total of 297 bed spaces. Therefore, the proposed Assisted Living program and Memory Care community would generate an estimated total of 244 emergency calls following the completion of Phase 1 (i.e., approximately 20 calls per month). While the commenter requests that the number of EMS requests be calculated per unit, this would result in an underestimate given that many of the proposed Assisted Living units and Memory Care units would have more than one bed space associated with them.

*Comment TRAO-124*

This comment asserts, without supporting substantial evidence or technical study, that peak noise would be experienced for a period of more than 10 seconds and over a much wider geographic area than described in the EIR, primarily due to unique local factors such as wind and topography. The EIR describes the peak noise levels of sirens of 100 dBA at 100 feet and goes on to describe that this noise level decreases by approximately 3 dBA for every doubling of distance. While the local wind and topography may create an environment in which siren noise can be heard for longer durations, given the distance and intervening structures, the proposed Project would not result in an exposure to peak noise levels of 91 to 100 dBA. The EIR estimates that the frequency of EMS response would increase from 98 calls per year to 244 calls per year, which is an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the RBMC and TMC. Nor would this magnitude and frequency of noise

exposure substantially contribute to increases in noise that could measurably result in health issues. Refer also to the response to Comment TRAO-35.

*Comment TRAO-125*

The comment claims that the EIR understates the need for EMS responses because it does not identify and differentiate the needs of elderly persons. As described in the response to Comment TRAO-123, previous records indicate that a total of 451 EMS calls associated with the campus at 514 North Prospect Avenue occurred between January 2015 and July 2019, with an average of 98 calls per year, which is and just over 8 calls per month for the 60 double-occupancy Memory Care units with 120 beds total. For reference this is similar to the 85 calls per year assumed in the Draft EIR prepared for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 203121065). In fact, the assumed number of calls per year assumed in the Kensington Assisted Living Facility Draft EIR was based on a lower average per bed estimate of 0.65 calls per bed per year to a similar facility within the City. As described further under Impact PS-1 in Section 3.13, *Public Services*, this analysis conservatively assumes that each of the EMS calls for the existing campus was associated with the Silverado Beach Cities Memory Care Community, rather than other medical office building space or the CHF currently located within the Beach Cities Health Center at 514 North Prospect Avenue. It is not likely that EMS calls would increase to this extent because at least some of the calls to the existing campus are likely attributable to other uses in the Beach Cities Health Center, which would no longer operate under the proposed Project.

*Comment TRAO-126*

This comment states that the firefighter to resident ratio is deceptively used and the analysis should consider the proportion of the at-risk elderly population served by RBFD Stations 1 and 2 as well as budget issues and costs for non-citizens, among other issues. However, the EIR provides detailed analysis of emergency response issues based on substantial evidence in the record including multiple contacts with emergency service providers.

As described under Impact PS-1, it is assumed that all future EMS responses would be addressed by RBFD Fire Station No. 1 or 2, similar to each of the responses to EMS calls from 2015-2019. Currently, the RBFD has a ratio of 0.93 sworn personnel to every 1,000 residents using the estimated 2019 population of 66,749. The addition of 177 Assisted Living residents to the campus would not substantially alter the ratio of firefighters from 0.93 sworn personnel for every 1,000 residents. This minor increase in population would reduce the ratio by < 0.01, and does not account for the fact that some of the residents would likely already be part of the Redondo Beach population prior to moving the Assisted Living facility. As discussed in Section 3.12, *Population and*

*Housing*, new employees and visitors to the campus would be drawn from the South Bay region and would not measurably affect the ratio of firefighters to residents. RBFD's average response times regularly meet their total response time goals (refer to Table 3.13-1), and RBFD has the existing required assets to respond to emergencies at the existing Beach Cities Health Center. The proposed Project would redevelop the existing Beach Cities campus, which is in close proximity (<1.2 miles) from RBFD's three Fire Stations. Because response times to the existing campus are satisfactory and the proposed Project would only very slightly increase the demand for RBFD services, the proposed Project would continue to be located well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the RBFD and would not require new or physically altered RBFD facilities.

As described in Section 3.13.3, *Impact Assessment and Methodology – Fire Project* Appendix G of the CEQA Guidelines requires that the analysis determine whether, *"[t]he project would result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services."* The costs of such services are a matter of City budgeting and is routinely addressed through the payment of development fees. The comments on the cost of fire protection services is not a comment on the adequacy of the environmental analysis in the EIR.

*Comment TRAO-127*

This comment cites CEQA Guidelines Section 15123(a) regarding the adequacy of an EIR and claims that there is insufficient information about the proposed electrical distribution system. However, the EIR provides detailed discussion of all project components, including the proposed electrical system. The proposed electrical distribution system is described in detail in Section 2.5.1.4, *Utilities and Services*. The location of the proposed Southern California Edison (SCE) Substation is shown on Figure 2-5 and Figure 2-7. Additional information is provided in Section 3.5, *Energy*, which describes that the 16 kilovolt (kV) or 4.16 kV line along North Prospect Avenue would be brought onto the Project site from a service drop along North Prospect Avenue. This medium voltage line would be distributed on-site via a proposed distribution system including a SCE Substation, which would be located along the eastern perimeter of the Project site, immediately east of the pedestrian promenade.

Impacts associated with the grading and construction of the proposed electrical distribution system are discussed together with the grading and construction for the rest of the proposed development under Phase 1 and Phase 2. The issues associated with PCE-contaminated soils are discussed at

length in Section 3.8, *Hazards and Hazardous Materials*, and MM HAZ-2a through -2d, which would require the preparation of a soils management plan, soil vapor monitoring, the use of soil vapor extraction equipment, and the procedures in the event that previously unknown or unidentified soil or groundwater contamination is encountered, would apply during the construction of the proposed electrical distribution system.

In terms of operational noise, the proposed electrical distribution system, including the proposed substation, would be required to comply with the City of Redondo Beach and the City of Torrance noise ordinances, including all maximum permissible sound level requirements by land use type. With regard to impacts to nesting birds, if construction activities occur within the nesting bird season, a pre-construction nesting bird survey would be required under MM BIO-1. Depending on the results of these surveys, avoidance and monitoring would be required to avoid impacts and potential conflicts with the Migratory Bird Treaty Act and/or the California Department of Fish and Game Code. For a detailed discussion and response to comments pertaining to health and biological risks, refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

*Comment TRAO-128*

This comment states that the EIR should evaluate a potential increase in rat invasions. First it should be noted that the threshold that has been cited in the comment selectively omits *"on any species identified as candidate, sensitive, or special status species"* Rodents are not candidate, sensitive, or special status species. Nevertheless, issues related to rodents are discussed in the EIR, which notes that *"due to the presence of the Silverado Memory Care Community and associated dining services on the campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus."* In light of this ongoing program, assertions that rodents would seek other homes in droves and the neighborhood will essentially become collateral damage during construction is unsupported by substantial evidence. The EIR adequately discloses and discusses such issues and BCHD programs proactively address such potential concerns.

*Comment TRAO-130*

The comment asserts that strong ozone ($O_3$) mitigations are required and cites CEQA Guidelines Section 15125(d), which states that *"any inconsistencies between the proposed project and…applicable air quality attainment or maintenance plan or State Implementation Plans"* must be described. However, the EIR exhaustively analyzes potential air quality impacts based on sophisticated computer modeling consistent with CEQA and regulatory agency requirements.

Section 3.2, *Air Quality* specifically discusses the attainment status of the South Coast Air Basin (refer to Table 3.2-2). The comment goes on to reference the concentration of $O_3$ as presented in Table 3.2-3. However, the comment fails to acknowledge that this table describes the *"number of days the threshold was exceeded and maximum levels during violations."* The comment further fails to acknowledge that last recorded exceedances – which only occurred on three individual days during the years – occurred in 2016. No exceedances have been recorded since.

The EIR fully addresses consistency with the SCAQMD's 2016 AQMP under Impact AQ-1 in Section 3.2, *Air Quality*. As described therein, neither construction-relation or operational emissions of $NO_x$ or VOCs (which are the primary constituents causing the formation of ground-level $O_3$) would exceed the SCAQMD's mass daily significance thresholds or the SCAQMD LSTs for sensitive receptors located within 25 meters (i.e., approximately 82 feet) of the Project site. Further, with the implementation of MM AQ-1, which addresses $PM_{10}$ and $PM_{2.5}$ construction-related emissions of $PM_{10}$ and $PM_{2.5}$, emissions of $NO_x$ and VOCs would be further reduced below these thresholds. Therefore, the proposed Project would not conflict with the SCAQMD's 2016 AQMP or require additional mitigation measures to address ground-level $O_3$.

*Comment TRAO-131*

This comment states that effect of shadows on health is well documented, and that the context presented for the analysis of shade and shadows pursuant to the requirements of CEQA is incorrect. While an internet search for *"CEQA shadow"* may return a number of results, the CEQA Guidelines do not specifically mention the terms *"shade"* or *"shadow."* Shade and shadows are typically only analyzed in an EIR when the lead agency, pursuant to CEQA Guidelines 15064.7(b), adopts methodologies and thresholds for assessing such an impact. The EIR already provides detailed analysis of these issues.

As described in Section 3.1.3, *Impact Assessment and Methodology*, neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. Nevertheless, having received scoping comments about the potential for the proposed Project to cast shadows (refer to Appendix A), BCHD elected to use The City of Los Angeles CEQA Thresholds to evaluate such impacts. It should be noted that this approach is not unique and has been used by a wide number of local jurisdictions within Los Angeles County – including both coastal and inland areas – that do not have their own quantitative significance thresholds for shade/shadow impacts (e.g., City of Santa Monica, City of Long Beach, Culver City, etc.).

*Comment TRAO-132*

The comment claims, without substantial evidence, supporting expert opinion or technical study, that the shadow analysis presented in the EIR is superficial. However, the EIR provides detailed modeling of potential changes in shade and shadows performed by licensed architects. A detailed discussion and response to comments pertaining to the shade and shadow study is presented in Master Response 9 – Aesthetics and Visual Resource Analysis. As described in Section 3.1, *Aesthetics and Visual Resources*, shadow length and bearing are dependent on the location of a site, which determines the angle of the sun relative to the Project site. In the Los Angeles basin, the maximum shadow a building can cast is usually equivalent to three times its height during the Winter Solstice (City of Los Angeles 2006). The potential for off-site shadow effects is dependent on the length of shadows created by a building, and the distance between the building and the nearest shade-sensitive land uses.

Shade and shadow simulations were prepared for the proposed Project using a computer-generated 3D model to identify the height and bulk of proposed building elements, mapping the footprint (i.e., location, shape, and size) of the Project site, and then calculating and diagramming the shadows that would be cast by the building components during the most extreme, or conservative, conditions (see Appendix M). The analysis simulates shadows for the Summer Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 6:00 p.m., for the Autumnal (Fall) Equinox at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., 4:00 p.m., and 5:00 p.m., and for the Winter Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 4:00 p.m. By modeling shadows for the Autumnal Equinox and the Summer and Winter Solstices, it is possible to see and analyze the worst and best-case scenarios of future shadow effects.

With respect to building height relative to the surrounding uses, the shade and shadow study took the surrounding topography and existing development into account as a part of the modeling. As described in Section 3.1, *Aesthetics and Visual Resources*, the shade and shadow study was prepared to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development. The claim that the analysis provides no measurements is also untrue. As describe under Impact VIS-4, shadow lengths and durations were clearly calculated and compared to The City of Los Angeles CEQA Thresholds.

The maximum height of the proposed mixed-use buildings on the Project site would be up to 103 feet above ground level and 133.5 feet above the vacant Flagler Lot below. This height would cast shadows on adjacent and vicinity buildings and public streets, including shadow-sensitive structures. However, as described under Impact VIS-4, none of the shade and shadows impacts owould exceed the thresholds established in the EIR, which describe that a significant shade and

shadow impact would occur *"if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October)."*

With respect to the requests for additional analysis, including a survey of the playground including the number of students who arrive at the school early, the number of students who come to the school late, CEQA Guidelines Section 15204(a) specifically states that *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."* The shade and shadow analysis provided in the EIR is quantitative, assesses key periods of maximum and minimum shadows, and assesses impacts with respect to accepted quantitative thresholds that are widely used by local municipalities within Los Angeles County.

*Comment TRAO-132*

This comment claims, without substantial evidence, supporting expert opinion or technical study, that the analysis of glare provided in the EIR is deficient and claims that the analysis does not address the full impact of glare, including increased heat, distraction, and nuisance. As described in Section 3.2, *Aesthetics and Visual Resources,* the analysis of light and glare describes the new sources of light and glare that would be introduced under the proposed Project in the context of existing light and glare standards in the Redondo Beach Residential Design Guidelines, RBMC, and TMC.

Impact VIS-3 acknowledges that the proposed Project may include new sources of glare associated with glazing (windows) and other reflective materials used in the façade of the proposed structures, which could potentially result in increased glare emanating from the Project site. However, as described under Impact VIS-3, the exterior of the proposed building shall be constructed of low- or no-glare materials, such as high-performance tinted non-reflective or non-mirrored glass and low reflective surfaces, with Light Reflective Values of less than 35 percent. The proposed Project also would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. The reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare effects on public views.

The citation from the Council on Tall Buildings in Urban Habitat in the comment discusses a range of issues for sky scrapers (i.e., well over 20 stories) and cites legislation in Singapore and Australia

that limits reflectivity in construction materials to 20 percent. However, this citation also discusses the confluence of *"complex geometries in buildings with more elaborate palette of exterior materials."* Other cities in the United States (e.g., City of Santa Monica) have also adopted some limitations on reflective materials (e.g., Santa Monica Municipal Code state that reflective materials may not exceed more than 25 percent of the façade surface area and prohibits the use of black or mirrored glass). However, there are no uniform requirements regarding reflective materials, and specific design requirements tend to be locally determined.

As described under Impact VIS-3, the exterior of the proposed building shall be constructed with *"low- or no-glare materials,"* with light reflective values of *"less than"* 35 percent. The proposed Project also would be subject to Redondo Beach Planning Commission Design Review. Through that process, specific high-performance tinted non-reflective or low reflective surfaces will be identified and required as conditions of approval for the proposed Project, so as not to produce obtrusive glare onto the public right-of-way or adjacent properties and to avoid issues such as those raised in the comment.

*Comment TRAO-133*

This comment implies that the EIR does not adequately assess potential impacts associated with asbestos containing material (ACM). However, the EIR provides substantial information and analysis of ACM related issues based on technical studies prepared by licensed experts and required mitigation measures to address potential impacts.

The potential for hazardous building materials, including ACM, to be present within the Beach Cities Health Center is described in Section 3.8, *Hazards and Hazardous Materials*. MM HAZ-1 requires BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and, potentially, the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not emitted into the surrounding environment. During construction the licensed contractor(s) shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed. MM HAZ-1 clearly meets the requirements for mitigation to avoid impacts related to the potential for exposure to hazardous building materials.

Additionally, CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment TRAO-134*

This comment asserts that the existing campus is an area of high cultural sensitivity and Native American monitoring is required for all ground-disturbing activities. Contrary to this assertion, the Project site has been disturbed, with extensive excavation, dating back to the original development of the South Bay Hospital (refer to Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Nevertheless, MM CUL-1a and -1b requires Native American Monitoring and the development of an Archaeological Resources Monitoring Plan. A Native American tribal monitor and qualified archaeologist shall be required during ground disturbing activities during the construction activities associated with Phase 1 and Phase 2 of the proposed Project.

With regard to the request to remove the word *"Tongva"* from the EIR, it should be noted that the NAHC specifically identified the following five Native American tribes and/or individuals with a geographic affiliation to the county within which the Project site is located:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians-Kizh Nation;
- Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians;
- Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council;
- Sandonne Goad, Chairperson, Gabrielino/Tongva Nation; and
- Charles Alvarez, Gabrielino-Tongva Tribe

Given that these contacts were provided by the NAHC, the regulatory authority responsible for identifying, cataloging, and protecting Native American cultural resources, the references to *"Tongva"* have not been revised as the comment requests.

### 9.3.4 Legal Comments

**Letter RLD**

June 10, 2021
Rebecca L. Davis
Lozeau | Drury LLP on behalf of SAFER

*Comment RLD-1*

The comment states that Lozeau | Drury LLP is representing the Supporters Alliance for Environmental Responsibility (SAFER). The comment summarizes the individual components of the proposed Project and without stating any specific issues or challenging any of the analysis provided, the comment asserts that the Draft Environmental Impact Report (EIR) fails as an informational document and fails to impose all feasible mitigation measures. Without any specific requests for revisions the comment requests recirculation of the Draft EIR. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. However, no substantial evidence has been provided to suggest that any of the triggers for recirculation described under CEQA Guidelines 15088.5 have been met.

**Letter RR1**

June 3, 2021
Robert R. Rone
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR1-1*

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR1-2*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also

notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 1.0, *Introduction* and Section 2.0, *Project Description* are provided in detail in the responses to Comment RR1-3 and RR1-9.

*Comment RR1-3*

The comment notes that an EIR is meant to be an objective, factual report on impacts which a proposed project would have on the environment. This comment is noted and is generally supported by California Public Resource Code § 21002.1(a), which describes that *"[t]he purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."* This comment is also generally supported by CEQA Guidelines Section 15151, which describes the standards for adequacy of the EIR.

The comment goes on to claim that BCHD has improperly and prematurely approved the proposed Project, citing the following actions that the comment asserts demonstrate approval: favoring a project; defending a project against opposition, and devoting extensive public resources to a project. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

The comment goes on to cite Save Tara v. City of West Hollywood, etc., et. al., 45 Cal.4th 116 (2008). However, it should be noted that this case dealt with whether and under what circumstances an agency's agreement allowing private development, conditioned on future compliance with CEQA, constitute approval of the project within the meaning of California Public Resources Code Sections 21100 and 21151. In particular, the Court found conditional agreement to sell land for private development, coupled with financial support, public statements, and other actions by its officials committing the city to the development. The Court did not find that development of a proposed master plan – including the commitment of funding for the preparation of market studies,

architectural design drawings, technical studies – or discussions during CWG, open houses, or at well-noticed public meetings constituted an approval action.

*Comment RR1-4*

The comment references CEQA Guidelines 15352(a), which provides a definition for approval. The BCHD Board of Directions have take no action *"which commits the agency to a definite course of action"* CEQA Guidelines 15352(b) goes on to that that *"[w]ith private approval occurs upon the earliest commitment to issue or the issuance by the public agency of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of the project."* Neither of these conditions have occurred with respect to the proposed Healthy Living Campus Master Plan. Contrary to the assertions in this comment, the BCHD Board of Directors have not approved the proposed Project or otherwise committed BCHD to a definite course of action. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. Any decisions or approvals regarding the proposed Project or its alternatives will only be considered after the Final EIR has been certified, consistent with CEQA Guidelines 15090.

*Comment RR1-5*

The comment summarizes the discussion of the project pillars and project objectives identified in Section 2.4.3, *Project Objectives*. The comment goes on to assert that the project objectives are about money or generating revenue. The comment goes on to claim that there is a singular focus on the proposed Project and BCHD has not appropriately considered finding other sources of revenue including cutting costs. For a detailed discussion and response to comments regarding the purpose and need as well as project objectives refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives.

As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach and Manhattan Beach as well as tens of thousands within other South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and

wellness services to its service population within the Beach Cities and the nearby South Bay communities.

Again, the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potential physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan.

With regard to the request to consider cutting costs, it should be noted that cutting costs would result in a reduction in community health and wellness programs and services provided by BCHD. Nevertheless, a reduction in such services is contemplated under the No Project Alternative. Additionally, given demolition activities described under the No Project Alternative may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of theses existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

*Comment RR1-6*

The comment restates the assertion that BCHD has approved the proposed Project. The comment goes on to make unfounded claims that one member of the BCHD Board of Directors has been ostracized and isolated in response to the position held on the proposed Healthy Living Campus Master Plan. For a detailed discussion and response to comments regarding the perceived approval of the proposed Project refer to the response to Comment RR1-3.

*Comment RR1-7*

The comment provides the handling of the previously plugged and abandoned oil well as an example of a red flag. The comment incorrectly asserts that the previously plugged and abandoned oil well has not been physically located. For a detailed discussion and response to comments pertaining to the previously abandoned oil and gas well on the vacant Flagler Lot, refer to Master Response 8 – Hazards and Hazardous Materials. As described therein, the Phase I ESA identified several potential environmental conditions at the Project site including a previously plugged and abandoned oil and gas well on the vacant Flagler Lot. Converse Consultants was unable to confirm the precise location of the well. However, in September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

*Comment RR1-8*

The comment asserts that BCHD has committed significant resources to shaping the proposed Project and implies that this constitutes a definite course of action with regard to the proposed Healthy Living Campus Master Plan. For a detailed discussion and response to comments regarding the perceived approval of the proposed Project, refer to the responses to Comment RR1-3 and RR1-4. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. The specific budget for the development of the Healthy Living Campus Master Plan is not germane

to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment RR1-9*

The comment restates the assertion that the BCHD Board of Directors has approved the proposed Project as a result of committing funds, citing the agreement with Cain Brothers. For a detailed discussion and response to comments regarding the perceived approval of the proposed Project, refer to the responses to Comment RR1-3 and RR1-4. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. For example, at the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

*Comment RR1-10*

The comment incorrectly concludes that the funding allocated to the development of the proposed Healthy Living Campus Master Plan constitutes an approval action. Refer to the individual responses to Comment RR1-2 through RR1-9. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. Any decisions or approvals regarding the proposed Project or its alternatives will only be considered after the Final EIR has been certified, consistent with CEQA Guidelines 15090.

## Letter RR2

June 3, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR2-1*

The comment notes that the attached letter and the comments provided therein constitute individual comments on the Draft Environmental Impact Report (EIR). Pursuant to the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR2-2*

This comment identifies the correct process for submitting comments on the Draft EIR, which has been prepared in accordance with the requirements of the CEQA. These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR2-3*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 3.1, *Aesthetics and Visual Resources* and Section 5.0, *Alternatives* are provided in detail in the responses to Comment RR2-4 and RR2-9.

*Comment RR2-4*

The comment describes that glare is the reflection of sunlight from the exterior of a building. The comment goes on to assert that the EIR requires the consideration of mitigation measures beyond those which may exist in building codes as building codes lag behind the impacts created by glare.

Glare is clearly described in Section 3.1, *Aesthetics and Visual Resources* as largely a daytime phenomenon, occurring when sunlight is reflected off highly polished surfaces or objects (e.g., windows, windshields, etc.), light-colored surfaces, or by vehicle headlights on adjacent roadways. The description acknowledges that excessive glare not only restricts visibility but can also increase the ambient heat reflectivity in each area. The description goes on to identify existing sources of glare on the existing campus and identifies light and glare sensitive receptors in the vicinity.

Table 3.1-2 under Impact VIS-2 describes the consistency of the proposed Project with existing policies in the Redondo Beach General Plan Land Use Element and Parks and Recreation Element. These policies generally involve glare associated with lighting.

Impact VIS-3 goes on to acknowledge that the proposed Project may also include new sources of glare associated with glazing (windows) and other reflective materials used in the façade of the proposed structures, which could potentially result in increased glare emanating from the Project site. The analysis discloses that the building design details remain conceptual and specific colors, siding, windows, and overall materials are still being refined. Pursuant to RBMC Section 10-2.1116 the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details cannot be finalized at this time. Contrary to the assertion that this makes the description of the proposed Project unstable, this is entirely common for projects in a variety of local jurisdictions (e.g., City of Santa Monica). This is also true for the analysis of the Kensington Senior Living Project within the City of Redondo Beach, which is also located on a parcel designated as P-CF. Nevertheless, Impact VIS-3 acknowledges that the proposed increase in building mass and size, it is expected that the Project would include a greater number of windows and reflective surfaces than the existing Project site. The analysis goes on to describe that the reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. The exterior of the proposed building would be constructed of low- or no-glare materials, such as high-performance tinted non-reflective or non-mirrored glass and low reflective surfaces, with Light Reflective Values of less than 35 percent. Specific design requirements would be further refined during the Redondo Beach Planning Commission Design Review prior to the issuance of building permits to further minimize the lighting and glare effects on public views.

*Comment RR2-4*

The comment suggests that the use of materials with Light Reflective Values of less than 35 percent is not adequate and provides a reference from the Council on Tall Buildings in Urban Habitat. As described in the response to Comment TRAO-132, this reference discusses a range of issues for sky scrapers (i.e., well over 10 stories) and cites legislation in Singapore and Australia that limits reflectivity in construction materials to 20 percent and 15 percent, respectively. However, it should be noted that this citation also discusses to confluence of complex geometries in buildings with more elaborate palette of exterior materials. Examples provided in the reference include 20 Fenchurch Street in London, UK (38 stories and 525 feet tall), Campbell Center located in Dallas, Texas (22 stories and 267 feet tall), Vdara Hotel located in Las Vegas, Nevada (57 stories

and 577 feet tall), Museum Tower located in Dallas, Texas (42 stories and 560 feet tall). These buildings are all more than 100 feet taller than the proposed RCFE Building and in some cases more than 400 feet taller. Additionally, each of these buildings has complex geometries (e.g., concave shapes) that can focus glare. These buildings are not comparable to the proposed RCFE Building or other development described under Phase 1 or Phase 2 of the proposed Healthy Living Campus Master Plan.

It is also important to emphasize, as described under Impact VIS-3, that the exterior of the proposed building shall be constructed with low- or no-glare materials, with light reflective values of less than 35 percent. While the Council on Tall Buildings in Urban Habitat notes that *"[m]ost City building code briefly and lightly address solar reflectively"* it is important to note that the proposed Project would be subject to the Redondo Beach Planning Commission Design Review. Through that process, specific high-performance tinted non-reflective or low reflective surfaces would be identified and required as conditions of approval for the proposed Project, so as not to produce obtrusive glare onto the public right-of-way or adjacent properties and to avoid issues such as those raised in the comment.

*Comment RR2-5*

The comment claims that the EIR should have discussed the purported harmful impacts associated with the proposed development under the proposed Healthy Living Campus Master Plan. Each of these issues is addressed individually in the responses to Comment RR2-6 and RR2-8.

*Comment RR2-6*

The comment claims that the proposed Project would result in increased heat and provides the Disney Concert Hall in Los Angeles as evidence. It should be noted that the Disney Concert Hall is a highly complex architectural structure designed by Frank Gehry using a Computer-Aided Three-dimensional Interactive Application (CATIA). The structure, which is characterized by concave and convex surfaces, was constructed using brushed stainless steel with highly-polished panels on certain curved areas of the structure. (Building officials later determined that these highly-polished panels were the source of the controversial glare and heat.) The RCFE Building and the other buildings described under the proposed Healthy Living Campus Master Plan bear no resemblance to the Disney Concert Hall. Due to the lack of complex geometry, the lack of highly-polished stainless steel surface, and detailed design review and refinement of building materials during the Planning Commission Design Review, there is no substantial evidence to suggest that the proposed Project would result in increased heat that would result in physical harm or discomfort, property damage, or loss of vegetation.

*Comment RR2-7*

The comment suggests that glare could increase vehicle accidents and again references the Council on Tall Buildings in Urban Habitat, which notes that *""in the late 1990s, a glazed building located near a cloverleaf interchange in Sydney made this issue evident."* The reference went on to identify that *"[a]ccording to the UK Automobile Association, nearly 3,000 accidents are caused yearly by direct sun glare."* However, this statistic was uncited and did not provide details on the types, locations, or causes of the accidents attributed to sun glare. It is important to note that the proposed development would not be located adjacent to a freeway or freeway interchange where vehicles are traveling at fast speeds. Instead, as described in Section 3.14, *Transportation*, the proposed Project would be located in an area where the majority of streets allow travel up to 35 miles per hour (mph) and intersecetions are controlled by signals and stop signs. Additionally, as described under Impact T-3, with compliance with local standards and regulations and review and approval by various local agencies, the proposed Project would not create potentially hazardous conditions for people driving. With the detailed design review and refinement of building materials during the Planning Commission Design Review, there is no substantial evidence to suggest that the proposed Project would result in glare that would cause vehicle accidents.

*Comment RR2-8*

The comment asserts that the EIR provides vague, general, and unsupported conclusions. The comment goes on to state that the glare greatly impacts vulnerable populations in the vicinity, including the very young and very old. As described in the response to RR2-4, Section 3.1, *Aesthetics and Visual Resources* identifies and discloses light and glare sensitive receptors in the vicinity, including nearby single-family residences along North Prospect Avenue, Flagler Lane, Flagler Alley, and Diamond Street, as well as multi-family residences along Beryl Street. Dominguez Park to the northeast of the Project site could also be considered a sensitive receptor to light and glare generated from the Project site. As described in the responses to Comment RR2-6 and RR2-7 with the detailed design review and refinement of building materials during the Planning Commission Design Review, there is no substantial evidence to suggest that the proposed Project would result significant glare impacts to these sensitive receptors.

## Letter RR3

June 3, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR3-1*

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR3-2*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 1.0, *Introduction*, Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, and Section 5.0, *Alternatives* are provided in detail in the responses to Comment RR3-2 and RR3-15.

*Comment RR3-3*

The comment asserts that certain portions of the City of Torrance General Plan as well as the General Plan and Specific Plans of the City of Redondo Beach are inconsistent with the proposed Project and prevent it from going forward. The comment goes on to state that this is the same for certain ordinances and rules applicable to the proposed Project. Responses to individual assertions related to these issues are provided in detail in the responses to Comments RR3-4 through RR3-15.

*Comment RR3-4*

The comment cites CEQA Guidelines Section 15125(d), which states that *"[t]he EIR shall discuss any inconsistencies between the proposed Project and applicable general plans, specific plans, and regional plans"* as well as CEQA Guidelines Section 15124(c), which states that the description of the project shall contain *"[a] general description of the project's technical, economic, and environmental characteristics…"* The EIR complies with both of the requirements under the CEQA Guidelines. Refer to Section 3.10, *Land Use and Planning* for a description of consistency with the applicable general plans, specific plans, and regional plans. Refer also to

Section 2.0, *Project Description*, for a detailed and complete description of the proposed Healthy Living Campus Master Plan.

*Comment RR3-5*

The comment asserts that the EIR does not address consistency with Torrance General Plan and specifically ignores the Torrance Hillside Overlay Zone. Contrary to the assertion, as described in Section 3.10, *Land Use and Planning*, the analysis for this category of impact does address the Torrance General Plan as well as the Torrance Municipal Code (TMC) and zoning ordinance.

Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issues by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are addressed in Section 3.10-5. Consistency with individual policies will also be considered by the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. The City of Torrance's jurisdictional over land use boundary does not extend further into the campus beyond the municipal boundaries, however.

The comment claims that the EIR ignores the Torrance Hillside Overlay Zone. However, as described in Section 2.0, Project Description, the EIR discloses and acknowledges that *"[t]he Torrance Property Zoning Map also identifies these Flagler Lane and Flagler Alley within the Hillside Overlay, which generally extends along the western border of Torrance."* Additionally, the Torrance Hillside Overlay Zone is depicted in Figure 3.10-2.

*Comment RR3-6*

The comment asserts that the EIR minimizes and fails to discuss other applicable items such as local street access codified by the City of Torrance. However, this issue is directly addressed in Table 3.10-6 in Section 3.10, *Land Use and Planning*. The consistency analysis provided therein acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

The comment goes on to describe that the EIR does not adequately discuss Measure DD, which the comment asserts prevents the proposed Project. Measure DD requires that any zoning changes in the City of Redondo Beach require a public vote. Given that the proposed Project would not require a change in zoning designation Measure DD is not applicable to the proposed Project. Measure DD is only discussed in so much as it applies to the alternatives discussed in Section 5.0, *Alternatives*.

*Comment RR3-7*

The comment restates issues related to the Torrance General Plan and the Torrance Hillside Overlay Zone, which are addressed in the response to Comment RR3-5. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issues by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

*Comment RR3-8*

The comment incorrectly states that the EIR ignored a legal duty to fully and completely discuss purported inconsistencies with the Torrance General Plan. These issues are addressed in the responses to Comment RR3-5 through RR3-7.

*Comment RR3-9*

The comment states that the Torrance Hillside Overlay Zone is a part of the Torrance General Plan and the EIR is obliged to discuss any inconsistencies. The comment references Figure 3.10-2, which shows the Torrance Hillside Overlay Zone overlays the City of Torrance right-of-way within the Project site. The applicability of the Torrance General Plan – including the Torrance Hillside Overlay Zone – are discussed in the responses to Comment RR3-5 through RR3-7. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issues by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

*Comment RR3-10*

The comment provides quotes from the Torrance Municipal Code regarding the City's Land Use Plan. For example, the comment states that as described in TMC Section 91.1.2, the City's Land Use Plan is binding on all governmental bodies, including all special taxing or assessment district

such as hospital districts. Similarly, the comment cities TMC Section 91.3.1, which describes the purpose of the Torrance Hillside Overlay Zone. The applicability of the Torrance General Plan – including the Torrance Hillside Overlay Zone – are discussed in the responses to Comments RR3-5 through RR3-7. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issues by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

*Comment RR3-11*

The comment restates that the proposed Project is located within Torrance Hillside Overlay Zone as acknowledged in Section 2.2.5, *Existing Land Use Designations and Zoning* and Figure 3.10-2. The comment correctly notes that the activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley include curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way. The comment states that the Torrance Hillside Overlay Zone land use restricts prohibit any of the building proposed by the Healthy Living Campus Master Plan. However, again, it is important to note that activities within the City of Torrance right-of-way would be limited to curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way. None of the RCFE Building footprint, subterranean service area and loading dock, or any of the other buildings described under Phase 1 or Phase 2 of the proposed Project would be located within the City of Torrance right-of-way.

*Comment RR3-12*

The comment restates that the Torrance Hillside Overlay Zone prevents the construction of the proposed Project and cites a number of requirements discussed under TMC Section 91.41.6. Again, as discussed in the responses to Comments RR3-5 through RR3-7, activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley would be limited to curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issues by the City of Torrance. None of these elements of the proposed Project occurring within the City of Torrance right of way would conflict with the provisions of TMC Section 91.41.6 identified in the comment. Consistency with individual policies will also be considered by the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. The City of Torrance's jurisdictional over land use boundary does not extend further into the campus beyond the municipal boundaries, however.

*Comment RR3-13*

The comment restates that access to local streets in the City of Torrance represents a violation of the General Plan and Specific Plans of the City of Torrance as well as TMC 92.30.8. As described in the response to Comment RR3-6, this issue is directly addressed in Table 3.10-6 in Section 3.10, *Land Use and Planning*. The consistency analysis provided therein acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

*Comment RR3-14*

The comment restates issues the assertion that the EIR does not adequately discuss Measure DD. However, as discussed in the response to Comment RR3-6, Measure DD requires that any zoning changes in the City of Redondo Beach require a public vote. Given that the proposed Project would not require a change in zoning designation Measure DD is not applicable to the proposed Project. Measure DD is only discussed in so much as it applies to the alternatives discussed in Section 5.0, *Alternatives*.

The comment asserts that a public/private partnership represents a major change in allowable land use. First, as described in Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation. However, perhaps more importantly, the comment itself cities Section 27.2 of Measure DD, which defines a major change in allowable land use as *"any proposed amendment, change, or replacement of the General Plan (including its local coastal element, as defined in Public Resources Code Section 30108.55), of the City's zoning ordinance (as defined and contained in Title 10, Chapter 2 of the Redondo Beach Municipal Code) or of the zoning ordinance for the coastal zone (as defined and contained in Title 10, Chapter 5 of the Redondo Beach Municipal Code)."* This definition quite clearly does not apply to the proposed Project, given that

the proposed Healthy Living Campus Master Plan would not require any proposed amendment, change, or replacement of the City of Redondo Beach General Plan or the City's zoning ordinance.

*Comment RR3-15*

The comment asserts that the required land use applications for zoning changes, Conditions Use Permits (CUPs), and other required permits are unclear. However, contrary to this assertion, the required entitlements and approvals for the proposed Healthy Living Campus Master Plan are clearly defined in Section 1.5, *Required Approvals*.

*Comment RR3-16*

The incorrectly claims that the EIR is inconsistent with the requirements of CEQA. Refer to the individual responses to Comment RR1-2 through RR1-15, which provides a detailed discussion and response to comments regarding the land use issues raised in this comment.

**Letter RR4**

June 3, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR4-1*

The comment states that it supplements the individual comments provided in Letter RR3. These comments have been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR4-2*

The comment asserts that BCHD has failed to address land use restrictions, which prevent it from pursuing the proposed Healthy Living Campus Master Plan. The comment claims that the deed under which Beach Cities Health District (BCHD) acquired the campus states that it may be used for hospital services for the residents of said district and other together with appurtenant apparatus for such hospital. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. For decades, BCHD, which is a California Healthcare District, has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities.

Implementation of the proposed Project would not substantially alter the use of the BCHD campus, which would continue to provide needed community health and wellness programs and services, including needed senior housing. Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted in P-CF zones with a conditional use permit (CUP). Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes. The issue of deed under which the BCHD acquired the campus is not otherwise germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

## Letter RR5

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR5-1*

The comment states that it supplements the individual comments provided in Letter RR3. These comments have been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR5-2*

The comment again asserts that the Beach Cities Health District (BCHD) has approved the proposed Project and cites the agenda packet that describes the general schedule for completing the environmental Impact Report (EIR) in compliance with California Environmental Quality Act (CEQA). It should be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

## Letter RR6

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR6-1*

The comment states that it supplements the individual comments provided in Letter RR3. These comments have been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR6-2*

The comment again asserts that the Beach Cities Health District (BCHD) has approved the proposed Project and cites a Request for Qualifications (RFQ) that was advertised in the *Los Angeles Times*. To be clear, while BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

**Letter RR7**

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR7-1*

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR7-2*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and

asserts that for these reasons it must be withdrawn. Responses to individual assertions related to the role of the Beach Cities Health District as the lead agency are provided in detail in the responses to Comment RR7-3 and RR7-10.

*Comment RR7-3*

The comment claims that the EIR does not present a clear, finite, and stable project description selectively citing analysis in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3, which more completely describes, *"[t]he building design details remain conceptual and specific colors, siding, windows, and overall materials are still being refined…"* Pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1116 proposed developments in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details (i.e., specific building colors, siding, windows, and other building materials) cannot be finalized at this time. While the Planning Commission Design Review could also further limit floor area ratio (FAR), building height, setbacks, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

The comment also cites Stopthemilleniumhollywood.co. v. City of Los Angeles, 39 Cal. App. 5th 1 stating that project descriptions that are curtailed and enigmatic prevents the public's ability to provide input. It should be noted however, that in this case the Court found Millennium filed a master land use permit, lacking any description or detail regarding what they intended to build. The initial study did not include any drawings or renderings; the number of buildings; or their shape, or size, or purpose. The only finite information was the development's size, location, and purposes of existing buildings nearby. This is clearly not the case for the proposed Project as demonstrated by the robust description of the proposed Project provided in Section 2.0, *Project Description*.

*Comment RR7-4*

The comment states that BCHD cannot serve as the lead agency asserting that the proposed Project would be operated by a private entity, BCHD is a limited purpose agency, and BCHD has little or no responsibility for supervising or approving the project as a whole. For a detailed discussion and response to comments pertaining to the issue of lead agency status, refer to Master Response 2 – BCHD as Lead Agency.

*Comment RR7-5*

The comment restates the EIR lacks a clear, finite, and stable description of the proposed Project, which is addressed in the response to RR7-3. The comment goes on to reference the Cain Brothers

review of the Market Feasibility Study prepared by MDS Research Company, Inc. and asserts that there was no plan or entity to own or develop the proposed Project. It should be noted the comments in Letter RR1 assert that the authorization of funding for market feasibility studies and the peer review of these studies by Cain Brothers constituted a premature approval of the proposed Project. These comments in Letter RR7 suggesting that BCHD should have already selected an operator appear to be in conflict with that previous logic. To be clear, while BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

The ultimate operator of the Residential Care for the Elderly (RCFE) Building or the Program of All-Inclusive Care for the Elderly (PACE) facility is not germane to the issue of the lead agency role or the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. As the lead agency, BCHD would be responsible for ensuring that implementation of mitigation measures occurs in accordance with the Mitigation, Monitoring, and Reporting Program (MMRP) in accordance with CEQA Guidelines 15097. A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified it Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

*Comment RR7-6*

The comment states that the eventual project will be privately owned and operated and for that reason asserts that BCHD cannot be the lead agency. BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities.

The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. However, as described in Master Response 2 – BCHD as Lead Agency, the proposed Project would still be approved and implemented, hence, carried out, by BCHD. For example, the BCHD Board of Directors has the responsibility for approving the proposed Healthy Living Campus Master Plan and implementing the proposed development, including approval of building demolition, construction of new buildings and associated improvements, and operation of the community health facilities, all in compliance with the proposed Healthy Living Campus Master Plan and State law.

*Comment RR7-7*

The comment asserts that BCHD is an agency with a single or limited purpose and cites CEQA Guidelines Section 15051(b)(1). However, this subdivision only applies to projects that are *"carried out by a nongovernmental person or entity."* Refer to the response to Comment RR7-6 and Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

*Comment RR7-8*

The comment asserts that the City of Redondo Beach is the only viable entity, which could serve as the lead agency for the proposed Project. However, as described in the response to Comment RR7-6 and Master Response 2 – BCHD as Lead Agency, the proposed Project would still be approved and implemented, hence, carried out, by BCHD. For example, the BCHD Board of Directors has the responsibility for approving the proposed Healthy Living Campus Master Plan and implementing the proposed development, including approval of building demolition, construction of new buildings and associated improvements, and operation of the community health facilities, all in compliance with the proposed Healthy Living Campus Master Plan and State law. As described in Master Response 2 – BCHD as Lead Agency there is no dispute between BCHD and any other agency with regard to which agency should be the lead agency to prepare the Draft EIR for the proposed Project; neither the City of Redondo Beach nor the City of Torrance have asserted lead agency status.

*Comment RR7-9*

The comment restates its assertion that BCHD cannot serve as the lead agency and suggests that BCHD serving as the lead agency circumvents Measure DD. Refer to the response to Comment RR3-14 and Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to these issues.

*Comment RR7-10*

The comment states that BCHD omits approvals that are required from the City of Torrance. However, contrary to this assertion, the approvals required form the City of Torrance are described in Section 1.5, *Required Approvals* and include:

- City Engineer approval of improvements to curbs, gutters, sidewalks, driveways, and construction of retaining walls associated with the one-way driveway and pick-up/drop-off zone as well as the service and loading dock entrance along Flagler Lane pursuant to Torrance Municipal Code (TMC) Section 74.3.2 and 74.3.4 (Torrance Engineering Division)
- Grading Permit pursuant to TMC Section 81.2.49 (Torrance Engineering Division);
- City Engineer approval of a building permit for retaining walls associated with the service area and loading dock entry/exit pursuant to TMC Section 92.13.2 (Torrance Engineering Division).
- Landscape Plan approval pursuant to TMC Section 92.30.6 (Torrance Community Development Department)

**Letter RR8**

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR8-1*

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR8-2*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and

asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 1.0, *Introduction*, Section 2.0, *Project Description*, Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, and Section 5.0, *Alternatives* are provided in detail in the responses to Comment RR8-3 and RR8-13.

*Comment RR8-3*

The comment describes that BCHD is required to locate hazards, discuss their relationship to the proposed Project, and identify alternatives. The comment goes on to identify the previously plugged and abandoned oil and gas well. However, the comment incorrectly asserts that BCHD has not made full and proper efforts to locate the well. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue. As described therein, in September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to Mitigation Measure (MM) HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

*Comment RR8-4*

The comment asserts that the proposed Project would be constructed over a toxic waste site. Refer to Master Response 11 – Hazards and Hazardous Materials for a detailed discussion and response to comments pertaining to this issue. As described in Section 3.8.1, *Environmental Setting*, BCHD has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered tetrachloroethylene (PCE) contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the Certified Unified Program Agency

(CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup. Although previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the BCHD campus have not experienced vapor intrusion form subsurface contamination, development would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatized PCE through carbon filters before outgassing the vapor at a controlled rate. Because PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

*Comment RR8-5*

The comment asserts that the description of seismic hazards provided in the EIR is incomplete and probably deceptive. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. As described in Section 2.1, *Introduction* and Section 2.4.2, *Project Background*, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This Beach Cities Health District Seismic Assessment is referenced in the EIR in Section 7.0, *References* and is publicly available at https://www.bchdcampus.org/sites/default/files/archive-files/January-2018-Nabih-Youssef-and-Associates-Presentation_CWG.pdf. This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the Beach Cities Health District Seismic Assessment and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance

building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). For example, as described, as described in Section 3.6, *Geology and Soils*, *"[t]he Beach Cities Health Center, formerly the South Bay Hospital, is a 60-year-old, non-ductile concrete building. The original 4-story (north) tower was constructed in 1958 and the 4-story addition (south tower) was constructed in 1967. Both of these towers were constructed with non-ductile concrete roofs, floors, and poorly reinforced columns, making them susceptible to collapse in the event of an earthquake."* These buildings were designed and constructed in conformance with building code requirements at the time of construction; however, the building code requirements have since evolved substantially based on research, best practices, and experience from previous earthquakes. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

*Comment RR8-6*

The comment cites CEQA Guidelines Sections 15020 and 15021 and asserts that BCHD knowingly released a deficient document. This assertion is unsubstantiated and unfounded. The EIR meets the standards for adequacy described in CEQA Guidelines Section 15151, which describe that *"an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."*

*Comment RR8-7*

The comment restates issues related to the previously abandoned oil and gas well, which are addressed in the response to Comment RR8-3 and Master Response 11 – Hazards and Hazardous Materials. The comment also briefly restates the assertion that the proposed Project would be

located on a toxic waste site. The issue of existing PCE contamination is addressed in Comment RR8-4 and Master Response 11 – Hazards and Hazardous Materials.

*Comment RR8-8*

The comment provides a lengthy overview of the issues related to the previously abandoned oil and gas well on the vacant Flagler Lot, beginning with the acquisition of the vacant Flagler Lot through to the preparation of the Phase I and Phase II Environmental Site Assessments (ESAs) as well as the additional activities to identify the precise location of the well. The comment asserts that the precise location of the previously abandoned oil and gas well is unknown must be identified because it affects the design of the proposed Project. However, as described in the response to Comment RR8-3 as well as Master Response 11 – Hazards and Hazardous Materials, in September of 2020, Terra-Petra conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the CalGEM Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

*Comment RR8-9*

The comment restates issues related to PCE and cites the Phase II ESA that described the results of the soil borings collected on the campus and the vacant Flagler. The comment asserts that these hazardous substances could cause serious injury or death as a result of the proposed Project. However, while the comment provides a thorough summary of the Phase II ESA results, it fails to acknowledge the environmental impact analysis or mitigation measures provided in the EIR that provide context around the results and industry standard mitigation measures that would be effective in reducing risk – particularly for construction workers – to a level that is less than significant. Most notably, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the CAA limits and OSHA exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create

a hazardous impact to the surrounding environment. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Refer to Master Response 11 – Hazards and Hazardous Materials, which provides a detailed discussion and response to comments pertaining to the issue of on-site contamination.

*Comment RR8-10*

The comment cites one of the project objectives related to seismic safety and asserts that it is a false statement used to justify the purpose of the proposed Project. As described in the response to Comment RR8-5 and Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

*Comment RR8-11*

The comment asserts that BCHD discriminates between occupants of the Beach Cities Health Center and the two other medical office buildings. As described in the response to Comment TRAO-8, construction has been phased as proposed because the more substantial geotechnical issues were identified in the 4-story Beach Cities Health Center, which is nearly a decade older and more susceptible to future structural stability issues in the event of an earthquake than the Beach Cities Advanced Imagining Building. Additionally, the Beach Cities Health Center includes Memory Care units that are occupied 24 hours per day.

*Comment RR8-12*

The comment cites that the proposed Project is an indefinite, uncertain, and speculative way to address seismic safety and suggests the use of reserves or reductions in expenses. As described in the response to Comment TRAO-9,

the project objective to eliminate seismic safety issues is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, *Project Description*, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies.

Other potential solutions for addressing the seismic retrofit are discussed in Section 5.0, *Alternatives.* As described therein, under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit.

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of theses existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

*Comment RR8-13*

The comment restates the assertion that BCHD presents the seismic issue as if it were a new, immediate, and unexpected problem and cites an article from the *Los Angeles Times,* which cites

the results of a seismic report as one of the reasons the South Bay Board voted to close the former South Bay Hospital. The comment fails to acknowledge that BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD's community health and wellness programs and services.

*Comment RR8-14*

The comment asserts that the EIR is invalid and should be withdrawn. However, contrary to this assertion, as described in the responses to Comment RR8-3 through RR8-13, the description of the proposed Project and the impact analysis provided within the EIR is consistent with the requirements of CEQA.

## Letter RR9

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR9-1*

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR9-2*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to the purpose and need and project objectives referenced are provided in detail in the responses to Comment RR9-3 and RR9-17.

*Comment RR9-3*

The comment cites CEQA Guidelines Section 15124(b), which states that the *"statement of objectives should include the underlying purpose of the project..."* The comment goes on to assert the statement of objectives in the EIR is misleading. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives described in the EIR.

*Comment RR9-4*

The comment asserts that the EIR attempts to play on the fears of the reader by listing seismic safety as a project objective. However, contrary to this unsubstantiated assertion, the project objectives do no such thing. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

The comment also fails to acknowledge that BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its

seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD's community health and wellness programs and services.

The comment goes on to incorrectly states that the proposed Project remains in the realm of pure speculation, because all portions of the proposed Project are currently conceptual. As described in the response to Comment RR7-3, pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1116 proposed developments in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details (i.e., specific building colors, siding, windows, and other building materials) cannot be finalized at this time. While the Planning Commission Design Review could also further limit floor area ratio (FAR), building height, setbacks, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

The comment goes on to assert that seismic issues can be easily and better addressed without the proposed Project. As described in the response to Comment RR8-12, other potential solutions for addressing the seismic retrofit are appropriately discussed in Section 5.0, *Alternatives*.

*Comment RR9-5*

The comment states that the term center of excellence is undefined. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. As described in Section 2.4.3, *Project Objectives* on of the project pillars is to build a center of excellence focusing on wellness, prevention, and research. The term center of excellence generally refers to a modern campus with public open space and facilities designed to meet the future community health and wellness needs of residents in alignment with BCHD's mission.

*Comment RR9-6*

The comment states that BCHD does not provide specific numbers to further define sufficient revenue. While the CEQA states that an EIR should provide a description of the project, including

a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). However, with regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs.

*Comment RR9-7*

The comment simply restates the objectives provided in Section 2.4.3, *Project Objectives*.

*Comment RR9-8*

The comment asserts the proposed Project ignores fixing known safety issues. It goes on to state that there is no legal requirement that any seismic safety issue be addressed through the proposed Project. Refer to the response to Comment RR9-4 as well as Master Response 3 – Project Need and Benefit.

*Comment RR9-9*

The comment asserts there are two buildings identified as candidates for seismic retrofits, but only the Beach Cities Health Center is prioritized. As described in the response to Comment TRAO-8 and RR8-11, construction has been phased as proposed because the more substantial geotechnical issues were identified in the 4-story Beach Cities Health Center, which is nearly a decade older and more susceptible to future structural stability issues in the event of an earthquake than the Beach Cities Advanced Imagining Building. Additionally, the Beach Cities Health Center includes Memory Care units that are occupied 24 hours per day.

*Comment RR9-10*

The comment incorrectly claims that the proposed Project is conceptual. As described in the response to Comment RR7-3, pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1116 proposed developments in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details (i.e., specific building colors, siding, windows, and other building materials) cannot be finalized at this time. While the Planning Commission Design Review could

also further limit floor area ratio (FAR), building height, setbacks, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

*Comment RR9-11*

The comment restates that there is no legal requirement to solved the current seismic issues. Refer to the response to Comment RR9-4 for a detailed discussion and response to this issue.

*Comment RR9-12*

The comment restates the assertion that there are other options available to BCHD to address the seismic issues. However, it should be noted that the elimination of seismic hazards is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, Project Description, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. However, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. The combined cost of renovation and seismic retrofit would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. This issue is also discussed in Section 5.0, *Alternatives* as a part of the rationale for the development of Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) as well as Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus.

*Comment RR9-13*

The comment restates the assertion that BCHD presents the seismic issue as if it were a new, immediate, and unexpected problem and cites an article from the *Los Angeles Times,* which cites the results of a seismic report as one of the reasons the South Bay Board voted to close the former South Bay Hospital. As described in the response to Comment RR8-13, the comment fails to acknowledge that BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs,

independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD's community health and wellness programs and services.

*Comment RR9-14*

The comment claims that the EIR does not address a basic seismic retrofit. However, contrary to this assertion, Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space*, clearly does describe a local bond measure and seismic retrofit. As described therein, under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

*Comment RR9-15*

The comment states that the EIR does not establish a seismic safety purpose for the proposed Project, claims that there are no specifics about a center for excellence, and again incorrectly suggests that that proposed Project is conceptual. These issues are discussed in detail in the responses to Comment RR9-4 and RR9-5 as well as Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives.

*Comment RR9-16*

The comment claims without any substantiating evidence that financial failure of the proposed Project is inevitable. For a detailed discussion and response to comments on such issues refer to Master Response 6 – Financial Feasibility/Assurances. This comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* Although these comments do not address the adequacy of the EIR, as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR9-17*

The comment states that BCHD will have a minority interest in the proposed Project and questions where the money will come from and at what cost. The comment asserts that the private entity will have complete control over BCHD's future and fate. This comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* While not relevant to the adequacy of the EIR, it should be noted that BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services.

*Comment RR9-18*

The comment asserts that the EIR is invalid and should be withdrawn. However, contrary to this assertion, as described in the responses to Comment RR9-3 through RR9-17, the description of the proposed Project and the impact analysis provided within the EIR is consistent with the requirements of CEQA.

**Letter RR10**

June 5, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR10-1*

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR10-2*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to the secondary impacts are provided in detail in the responses to Comment RR10-3 and RR9-7.

*Comment RR10-3*

The comment incorrectly claims that the EIR ignores secondary impacts and cites the length of discussion in Section 4.3, *Significant Irreversible Environmental Changes*. The content for this section of the EIR is specifically defined in CEQA Guidelines Section 15126.2, which states:

> *"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. (See*

*Public Resources Code section 21100.1 and Title 14, California Code of Regulations, section 15127 for limitations to applicability of this requirement.)"*

Project specific impacts related to air quality, noise, vibration, air quality, hazardous materials are addressed in detail within Section 3.1, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, and Section 3.11, *Noise*. Each of these analyses address direct and indirect impacts, residual impacts following the implementation of required mitigation measures, and cumulative impacts.

*Comment RR10-4*

The comment claims that issues related to safety and noise and vibration on school children were ignored. However, contrary to this assertion, as described in the response to Comment RR10-2, noise and vibration impacts to sensitive receptors – including schools – were thoroughly addressed in Section 3.11, *Noise*. Additionally, potential safety issues were addressed in Section 3.8, *Hazards and Hazardous Materials* as well as Section 3.14, *Transportation*.

*Comment RR10-5*

The comment raises the issue of potential impacts of particulates and noise on sensitive receptors including Towers Elementary School and elderly individual living in the residential areas surrounding the Project site. Contrary to the assertion that these issues have been overlooked, each has addressed in extensive detail, with findings supported by exhaustive quantitative modeling, in Section 3.2, *Air Quality* and Section 3.11, *Noise*.

*Comment RR10-6*

The comment incorrectly states that the previously plugged and abandoned oil and gas well has not been addressed. Contrary to that assertion, this issue has been the subject of Phase I and Phase II Environmental Site Assessments (ESAs) as well as various follow up actions, including excavation of the previously plugged and abandoned oil and gas well to identify its precise location. This issue as well as issues related to the potential for upset, are thoroughly addressed in Section 3.8, *Hazards and Hazardous Materials*.

*Comment RR10-7*

The comment states that there would be an increase in water consumption of millions of gallons per year and without any substantiating evidence questions the finding that no public water main upgrades would be required. As described in Section 3.15.1.1, *Environmental Setting – Water Infrastructure and Supply*, Cal Water has concluded that the Hermosa-Redondo District will have adequate water supplies to meet projected demands under normal, single dry year, and multiple

dry year conditions through the year 2040. Additionally, as described under Impact UT-1, Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the California Public Utilities Commission (CPUC). No upgrades to public water mains would be needed under the proposed Project. Cal Water's potable water system has the infrastructure and the capacity to serve the proposed Project.

**Letter RR11**

June 6, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

*Comment RR11-1*

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment RR11-2*

The comment summaries the purposes of the CEQA process including that requirement that *"[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"* (CEQA Guidelines Section 15126). The comment also notes that public participation is *"an essential part of the CEQA process"* (CEQA Guidelines Section 15201).

The incorrectly states that comments submitted on the Draft EIR have been ignored. CEQA Guidelines Section 15204 defines the suggested focus of the review:

> *"In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude*

> *of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."*

Nevertheless, all comments that have been received on the Draft EIR, even comments that simply express general opposition to the proposed Project (refer to Master Response 1 – General Opposition to the Proposed Project) have been incorporated into the Final EIR as a part of the responses to comments and will be advanced to decision makers for further consideration during deliberations on the proposed Project. The assertion that the EIR must been withdrawn and ignored is unsubstantiated.

**Letter RR12**

June 9, 2021
Robert R. Ronne

*Comment RR12-1*

This comment describes that 11 individual comment letters have been submitted on the Draft EIR from Robert Ronne. Each of these comment letters on the Draft EIR have been received, incorporated into the Final EIR as a part of the response to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project. Refer to the individual responses to Letter RR1 through Letter RR11.

### 9.3.5 Form Letters

**Letter FL1**

*Comment FL1-1*

The comment provides a table of contents summarizing each of the comments, which are responded to in detail individually below.

*Comment FL1-2*

The comment presents a screenshot of a written communication from Beach Cities Health District (BCHD) legal counsel describing the benefits of the proposed Project to the City of Redondo Beach. The comment goes on to state that the MDS Research Company, Inc. study assumes less

than 5 percent of the Assisted Living residents would be from south Redondo Beach. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

*Comment FL1-3*

As described in Master Response 10 – Air Quality Analysis, an exhaustive air quality modeling effort was conducted to evaluate construction and operational air emissions associated with the proposed Project. While second hand smoke may be locally regulated, it is not emitted in substantial quantities or for such a duration that that it would result in long-term health impacts to adjacent sensitive receptors. Nevertheless, BCHD is and would continue to be responsible for complying with Ordinance No. 0-3193-19. Noncompliance with this ordinance or any other local ordinance or regulations could be subject to enforcement action from the relevant regulatory agencies.

*Comment FL1-4*

The comment claims that financing for the proposed Residential Care for the Elderly (RCFE) Building is forbidden under governing law. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. For decades, BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. It should also be noted that at least one other California Health District – the Salinas Valley Memorial Hospital District – also operates 72 assisted living beds (see the Salina Valley Memorial Hospital District website here: https://www.svmh.com/about-us/affiliates-partnerships/).

*Comment FL1-5*

The comment claims that the proposed development does not conform to the same conditions that were described for the Kensington Senior Living Project. The comment states that the proposed Project is not consistent with the type of adjacent land uses as it would be developed and operated by a third-party adjacent to surrounding single- and multi-family uses. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. For decades, BCHD, which is a California Healthcare District, has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter the use of the campus, which would continue to provide needed community health and wellness programs and services, including needed senior housing. Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted in P-CF zones with a conditional use permit (CUP). A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory Care Community. The proposed Project – like other improvements made on the campus in the past – would require a CUP that would be issued under the existing code. As described in RBMC Section 10-2.1116, the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes.

*Comment FL1-6*

The comment asserts that the proposed development is not consistent with the character of the adjacent residential land uses. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to commenters pertaining to visual character. As described in Section 3.1, *Aesthetics and Visual Resources,* the proposed Project would comply with the required building height prescribed in RBMC Section 10-2.622 and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Beyond the subjective assertion that the building is not consistent with the character of the adjacent

residential land uses the comment does not challenge any specific aspects of the analysis of visual character presented under Impact VIS-2 or provide any substantiating evidence to further support its assertion.

*Comment FL1-7*

The comment asserts that BCHD is proposing a commercial use that no assessment of quantifiable benefit. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. Refer also to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. As described in the response to Comment FL1-6, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter the use of the campus, which would continue to provide need community health and wellness programs and services, including needed senior housing. The proposed Project would continue the existing model to reinvest revenue into community services such as senior care and health programs. A quantitative analysis of BCHD's services can be found in the Community Health Report (https://www.bchd.org/healthreport) as well as the Priority-Based Annual Budgets (https://www.bchd.org/operating-budgets).

*Comment FL1-8*

The comment states that BCHD requires a CUP pursuant to the P-CF zoning requirements and cites specific requirements of the CUP ordinance. The EIR acknowledges that pursuant to RBMC Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted on P-CF zones with a CUP. Further, the EIR acknowledges that the FAR, building height, number of stories, and setbacks of development, etc. in P-CF zones are subject to Planning Commission Design Review pursuant to RBMC Section 10-2.1116.

RBMC 10-2.2506 sets out the purpose of a CUP and the criteria that would be evaluated during the Planning Commission Design Review. However, these criteria provided in RBMC 10-2.2506 do not set specific quantitative limits for each individual criterion. These determinations are subject to the discretion of the City's Planning Commission.

*Comment FL1-9*

The comment asserts that the surrounding properties and the perceived quiet environment would be impacted by the proposed Project. The comment goes on to claim that the proposed Project

would result in: 1) privacy invasion; 2) reflected noise; 3) reflected light and glare; 4) direct noise; 5) construction; and 6) related traffic and pollution. It also asserts that students at Towers Elementary would be impacted by fine particulate matter ($PM_{2.5}$) and suspended particulate matter ($PM_{10}$) emissions as well as intermittent noise and vibration from heavy construction traffic. The comment claims that these construct-related impacts could result in disturbances to cognitive function and development as well as educational progress. However, the comment fails to acknowledge that each of these issues is addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. Further, as described in Section 3.2, *Air Quality* and Section 3.11, *Noise*, the exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would neither be significantly impacted by construction-related air emissions nor construction-related noise and vibration.

*Comment FL1-10*

The comment asserts that the proposed Project must incorporate: 1) increased setbacks; 2) reduced structure heights; 3) perimeter structures that do not exceed the design guidelines and height limits of adjoining uses and properties (generally 30-feet or less), perimeter landscaping that hides the proposed development etc. The comment fails to acknowledge that while RBMC 10-2.2506 references and considers setbacks, opens spaces, and buffers it does not prescribe specific distances, areas, or other measures. Additionally, as described in Master Response 9 – Aesthetics and Visual Resources Analysis, the comment fails to acknowledges that the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which already provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street. Additional setbacks, reductions in building heights, etc. would be considered as a part of the Planning Commission Design Review for the proposed Project, which would be required pursuant to RBMC Section 10-2.1116.

*Comment FL1-11*

The comment claims that the proposed PACE facility is duplicative with existing PACE the same area, providing a marginal benefit to the Beach Cities. However, as described further in Master Response 3 – Project Benefit and Need, there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; there are currently no PACE programs located in any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

*Comment FL1-12*

The comment claims that the use of the PACE facility – including the use of vans or buses to bring participants to the facility – would increase traffic and increase $PM_{2.5}$ and $PM_{10}$ exposure to students at Towers Elementary School. However, the comment fails to acknowledge the exhaustive quantitative modeling effort provided in support of the EIR. As described in Impact AQ-3, the results of this effort demonstrate that operational criteria air pollutant emissions, including mobile source emissions associated with vehicle trips to and from the Project site, would not exceed the South Coast Air Quality Management District's (SCAQMD's) localized significance thresholds (LSTs), which account for potential human health effects from criteria air pollutants. The claim that vehicle travel to and from the Project site would result in Alzheimer's like symptoms and delayed development is unsubstantiated and unfounded.

The comment goes on to claim that the parking structure entrance in Phase 2 of the proposed Project is inconsistent with the existing use at the intersection of North Prospect Avenue & Diamond Street. However, the comment fails to acknowledge that the EIR does not identify any design hazards associated with the use of the existing driveway for this purpose. Also, while no longer a California Environmental Quality Act (CEQA) issue pursuant to Senate Bill (SB) 743 and CEQA Guidelines 15064.3, the implementation of the proposed Project would not result in substantial increases in volume-to-capacity (V/C) ratios or vehicle delays at any of the three existing driveways along North Prospect Avenue or the intersection of North Prospect Avenue & Diamond Street (refer to Appendix M). This is because vehicles would travel to and from the Project site throughout the day and would not be concentrated around the peak hours. In fact, even with the implementation of Phase 2, there would still be a minor reduction in AM and PM peak hour vehicle trips. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to trip generation associated with the proposed Project.

*Comment FL1-13*

The comment restates the claim that the proposed Project would have an adverse impact on abutting properties. Refer to the response to Comment FL1-10, which addresses comments regarding the CUP ordinance.

*Comment FL1-14*

The comment states that construction traffic must be denied the path down Beryl Street from Flagler Lane to West 190th Street. As described in Master Response 13 – Transportation Analysis, in response to comments from Torrance Unified School District (TUSD) and the City of Torrance, the proposed haul routes have been revised in the Final EIR as follows:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from Flagler Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards Interstate (I-) 405.
- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesiea Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.
- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

BCHD has incorporated these suggested revisions in keeping with Mitigation Measure (MM) T-2, which requires that the proposed haul routes are "*consistent with the Redondo Beach and Torrance General Plan designations.*"

*Comment FL1-15*

This comment provides a table showing the relative height of the proposed RCFE Building and the proposed development in Phase 2 as compared to adjacent properties based on topographical data purportedly from the U.S. Geological Survey (USGS). The comment goes on to incorrectly claim that the CUP cannot allow the proposed development due to these height difference. There are no provisions in the RBMC that would prohibit the City of Redondo Beach for issuing a CUP for the proposed Project. The proposed Project would be consistent with RBMC Section 10-2.622, which includes maximum height limits along with other development standards for the C-2 zone designation that governs the vacant Flagler Lot. The RBMC does not specify building heights or FARs for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for additional discussion and response to comments pertaining to building height and visual character.

*Comment FL1-16*

The comment recognizes that the original campus opened in 1960, but specifies that it was opened as an emergency hospital providing lifesaving serves to the surrounding neighborhood. The

comment goes on to assert that BCHD intends to import tenants from outside of the 90277 zip code and that the Beach Cities are already served by PACE. For a detailed discussion and response to comments pertaining to the benefits of the proposed Project refer to Master Response 3 – Project Need and Benefit. First, it should be noted that it is highly unlikely that the original South Bay hospital only served the 90277 zip code. Hospitals (and health districts) generally do not provide benefits to a single zip code or neighborhood and instead provide these benefits to a wider community. Three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach specifically identify that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the campus, referred to in the study as the Primary Market Area. It should also be noted that revenue generated by the uses under Phase 1 – including the proposed Assisted Living program – would support BCHD's broader range of community health programs and services provided to the Beach Cities and the nearby South Bay communities. Refer also to the response to Comments to FL1-11 regarding the need for PACE in the Beach Cities.

*Comment FL1-17*

The comment restates a public records request for a benefits analysis. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments related to the benefits of the proposed Project. As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach, and Manhattan Beach as well as tens of thousands within nearby South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. BCHD expended considerable time and effort researching and evaluating anticipated community health needs in the coming decades, particularly with regard to senior care. The need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, the need for the proposed Project has been discussed in detail at numerous well-noticed public hearings. After careful consideration of projected community health needs over the coming decades, the BCHD Board of Directors identified the proposed Project as a key component to addressing future community health needs and drafted a set of project objectives, which helped define those health needs and project benefits which guided project design. As described in CEQA Guidelines Section 15093, *"CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits,*

*including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project."* If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall *"state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record"* (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

*Comment FL1-18*

The comment asserts that based on BCHD's response to a California Public Records Request, 85 percent of the COVID-19 tests conducted at the campus were conducted for non-residents. The comment goes on to assert that BCHD has no data to demonstrated local benefits compared to negative Environment Justice impacts. Although not germane to the adequacy of the EIR, it should be noted that even if the uncited assertion that 85 percent of the COVID-19 test conducted at the campus were for South Bay residents located outside of the 90277 were to be accurate, these tests would have unquestionably had a beneficial public health impact for the region, including residents within the 90277 zip code.

With regard to the claim that the proposed Project would result in negative Environmental Justice impacts it should be noted that according to California Office of Environmental Health Hazard Assessment (OEHHA) CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. This ranking is based on specific categories such as pollutant exposure, environmental effects, sensitive populations, and socioeconomic factors. While not specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

*Comment FL1-19*

The comment claims that BCHD data cannot quantify any benefits to the 90277 and 90278 zip codes that would experience 100 percent of the Environmental Justice impacts. Refer to the response to Comments FL1-17 and FL1-18 for a detailed discussion and response to comments pertaining to these issues.

*Comment FL1-20*

The comment identifies and describes seven parcels within the City of Redondo Beach that have a P-CF (Community Facility) zoning and land use designation. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

*Comment FL1-21*

The comment asserts that neither the existing campus, nor the development described under the proposed Health Living Campus Master Plan comply with the RBMC requirements for issuance of a CUP. Refer to Comment FL1-9 for a detailed discussion and response to comments regarding this issue. Refer also to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

*Comment FL1-22*

The comment incorrectly claims that BCHD must dedicate all open land to unrestricted public use or a CUP cannot be issued. As described in the response to Comment TRAO-14, the proposed Project would substantially expand open space on the existing campus, including 114,830 sf of programmable open space within the interior of the Project site. The central lawn would be sized to accommodate a variety of outdoor community events such as movie nights or group fitness activities. Contrary to the assertion in the comment, the open space would not be privately owned or otherwise cordoned off for security purposes.

*Comment FL1-23*

The comment incorrectly claims that BCHD fails to provide an accurate, stable, and finite project description. The comment asserts that Phase 2 has multiple descriptions denying the public the right to intelligent participation. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, regarding the approach to the programmatic analysis of the Phase 2 development program. The analysis of the proposed Phase 2 development program meets the requirements of CEQA Guidelines Section 15165. The comment also asserts that BCHD ignores laws and ordinances and that no codes or ordinances require demolition of the Beach Cities Health Center. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example,

the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

*Comment FL1-24*

The comment claims that the analysis of alternatives provided in the EIR is inadequately developed and flawed. The comments asserts that the analysis of the No Seismic Retrofit alternatives cites a false narrative of terminating leases to implement a retrofit. As described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. As described in Section 5.0, *Alternatives*, the No Seismic Retrofit alternative would involve interior renovation of the Beach Cities Health Center, including demolition of interior walls, upgrades to existing electrical and plumbing systems, and reconfiguration of interior space to better accommodate potential tenants. The interior renovation of the Beach Cities Health Center would address other existing maintenance issues (e.g., outdated electrical and plumbing systems) and would provide space configurations that would be better suited for potential tenants; however, given the extent of the building-wide upgrades, this alternative would require BCHD to end or temporarily suspend many of its existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. It is possible that some portions of the building may continue to be operable during individual phases of construction (e.g., when construction is occurring in the North Tower, portions of the South Tower may still be operable). However, existing medical office space could not be reasonably considered to continue uninterrupted throughout the entire construction period. Additionally, it would not be possible for the existing Silverado Beach Cities Memory Care Community to continue with care and treatment in such conditions. The EIR acknowledges that the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission (refer to Section 2.4.2, *Project Background*). Revenues from the long-term tenant leases support BCHD community health programs and services, such as the Community Services program, the CHF, and the Beach Cities Partnership for Youth. This substantial loss of revenue during the extensive interior renovation would exacerbate

existing substantial reductions in BCHD program offerings. It should also be noted that this alternative would not meet any of the project objectives (e.g., providing public open space to accommodate community health programs).

*Comment FL1-25*

The comment claims that the EIR failed to consider an appropriate No Project Alternative. The comment claims that if demolition is voluntarily elected, the mitigation for associated impacts should be the establishment of a taxpayer-owned community garden. The comment attempts to support this assertion with a claim that BCHD was not voter approved and that the Assisted Living program included in the proposed Project would serve non-residents. The comment envisions a community garden that would be developed and maintained by the revenues from the two remaining medical office buildings. (However, the comment provides no substantiating information demonstrating that this would be a financially feasible or reasonably foreseeable outcome of not implementing the proposed Health Living Campus Master Plan.) The comment goes on to state that as each medical office building comes to the end of their lease, the comment suggests that the buildings can be demolished and their footprints can be added to the community garden. The comment acknowledges that this would result in a substantial downsize in staff and operations, with BCHD becoming a property management and financial grant entity. The comment notes that if the BCHD charter could not be legally amended to support this change in its mission, BCHD would be dissolved, a three city community garden established, and BCHD assets would liquidated and put into a non-wasting trust to maintain the community garden.

First, with regard to the assertions that demolition would result in Environmental Justice impacts, refer to the response to Comment FL1-18. According to OEHHA CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. While not specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

With regard to the scope of the No Project Alternative, CEQA Guidelines Section 15126.6(e)(2), *"[t]he 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."* The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the

existing campus would not be redeveloped. BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would continue to operate the facilities (to the extent that it was financially feasible) before eventually addressing the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves. Following the demolition, BCHD would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is "*reasonably expected to occur in the foreseeable future"* clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24,

2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of theses existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

While BCHD does support programs related to healthy eating choices and other preventative health care measures, the mission of BCHD focuses on broad health and wellness services for residents in the Beach Cities and the nearby South Bay communities. The formation of a Community Garden Association does not directly fit within BCHD's mission to offer an extensive range of dynamic health and wellness programs, with innovative services and facilities to promote health and prevent diseases across the lifespan.

*Comment FL1-26*

The comment asserts that the by presenting example Phase 2 site plans, the EIR fails to provide an accurate, stable, and finite project description. For a detailed discussion and response to comments pertaining to the programmatic analysis of Phase 2 refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis. The EIR evaluates the potential physical environmental impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. The complete description of both the Phase 1 preliminary site development plan and the Phase 2 development program is provided in Section 2.5, *Proposed BCHD Healthy Living Campus Master Plan*, and is based upon the published version of the Healthy Living Campus Master Plan prepared by Paul Murdoch Architects under the direction of the Beach Cities Health District (BCHD). The Healthy Living Campus Master Plan is publicly available here: https://www.bchdcampus.org/campus.

Guidance on the preparation of EIRs that analyze projects at both a project level of detail, and a programmatic level of detail is provided under Article 11 of CEQA Guidelines. Specifically, CEQA Guidelines Section 15160 states that there are *"a number of examples of variations in EIRs as the documents are tailored to different situations and intended uses. These variations are not exclusive… [and] Lead Agencies may use other variations consistent with the Guidelines to meet the needs of other circumstances."* A project EIR is defined as *"[a] type of EIR [that] should focus*

*primarily on the changes in the environment that would result from the development project"* (CEQA Guidelines Section 15161), while a program EIR is defined as *"an EIR which may be prepared on a series of actions that can be characterized as one large project and are related..."* (CEQA Guidelines Section 15168). Generally, a program EIR analyzes a project for which less specific detail is currently known, but would be developed at a later date. If, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, as needed, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Such is the case for Phase 2 of the proposed Project, for which a single detailed preliminary site development plan and construction information has not yet been developed. This is due to two primary factors: 1) as described in Section 2.0, *Project Description*, the Phase 2 development program would be implemented at least 5 years after the development under Phase 1; and 2) the programming in Phase 2 and the associated development is intended to respond to the Community Health Report and priority-based budgeting efforts to meet constantly evolving community health and wellness needs in the Beach Cities and the nearby South Bay communities. As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan. This approach is often used by lead agencies – including local municipalities – when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans existing for later improvements. There are several advantages that can be attributed to this approach, including allowing for *"the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts"* (CEQA Guidelines Section 15168[b][4]). In the event that later *"tiered"* analysis is determined necessary for the Phase 2 improvements, the lead agency *"shall incorporate feasible*

*mitigation measures and alternatives developed in the program EIR into later activities in the program"* (CEQA Guidelines Section 15168[c][3]).

*Comment FL1-27*

The comment contests the need for the proposed PACE services, stating that all of the zipcodes of BCHD and all surrounding zip codes are already served by PACE. The comment goes on to provide additional financial overview information, which appears to be excerpted from the Cain Brothers study. Refer to Master Response 3 – Project Need and Benefit to a detailed discussion and response to comments regarding the purpose and need for the proposed PACE services. BCHD has conducted exhaustive research regarding assistance for seniors who choose to remain in their own home, but require substantial support to do so. In fact, several commenters voicing opposition to the Assisted Living program component of the proposed Project have cited this need. As described in Section 2.0, *Project Description*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services to older adults – involving a combination of adult day care center services and in-home care services. PACE is intended to allow older adults to remain in the community rather than receive care in an Assisted Living facility. As described in Section 2.0, *Project Description* and as shown on the National PACE Association website, there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located in any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

Aside from the need for PACE services discussed above, these comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

*Comment FL1-28*

The comment asserts that the purpose and need for the proposed RCFE Building is invalid based on the MDS market study. For a detailed discussion and response to comments pertaining to these issues refer to Refer to Master Response 3 – Project Need and Benefit, Master Response 5 –

Affordability of RCFE Assisted Living and Memory Care Units, and Master Response 6 – Financial Feasibility/Assurance.

Aside from the general purpose and need for RCFE Building, which are addressed in the master responses, these comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

As described in CEQA Guidelines Section 15093, *"CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project."* If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall *"state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record"* (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

*Comment FL1-29*

The comment restates that there are no laws or ordinances that require any retrofit or demolition of the Beach Cities Health Center. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

*Comment FL1-30*

The comment asserts that BCHD has no program budgets, cost-accounting, or benefits assessment and therefore cannot assert any of its programs provide benefits above its costs to residents of the Beach Cities. Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potential physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. CEQA does not require an exhaustive quantification of the value that BCHD provides to the community within the EIR. Nevertheless, a quantitative analysis of BCHD's services can be found in the Community Health Report (https://www.bchd.org/healthreport) as well as the Priority-Based Annual Budgets (https://www.bchd.org/operating-budgets).

*Comment FL1-30*

The comment states that BCHD does not provide evidence that the proposed Assisted Living program would result in benefits to the Beach Cities. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The MDS market study identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the campus, referred to in the study as the Primary Market Area. Further, the comment does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. The comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

*Comment FL1-31*

The comment states the project objectives considered in the EIR are overly restrictive. However, as discussed in Master Response 4 – Project Objectives, the project objectives directly reflect BCHD's primary mission to support community health and wellness by providing needed housing and long-term care to seniors as well as generating revenue to support BCHD's broader range of community health programs and services.

Pursuant to CEQA Guidelines Section 15124(b) the objectives of a project are intended to *"help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.*

*The statement of objectives should include the underlying purpose of the project and may discuss the project benefits."* As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD's programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD's continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use spaces (e.g., CHF, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

The project objectives presented in the EIR clearly meet the requirements of CEQA Guidelines Section 15124(b). It should also be noted that these project objectives have been appropriately used to develop a range of feasible alternatives that would substantially reduce significant impacts associated with the proposed Project while still accomplishing most of the basic project objectives (refer to Section 5.0, *Alternatives*). The EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only as the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), because it would reduce the total duration of the significant and unavoidable construction-related noise impact. This alternative would also incorporate an alternative circulation scheme that would avoid any potential conflicts associated with vehicle access along Flagler Lane. Further, this alternative addresses public concerns, at least in part, over the size and scope of the proposed Project.

*Comment FL1-32*

The comment restates that there are no laws or ordinances that require any retrofit or demolition and cites the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates in March 2018. As described in the response to Comment FL1-23, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract

from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

*Comment FL1-33*

The comment asserts that BCHD has no scientifically valid reason for the proposed open space. The comment goes on to restate the definitions provided by BCHD for the proposed Wellness Community and Healthy Living Campus. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments on issues related to the project objectives identified in the EIR. Pursuant to the CEQA Guidelines Section 15124(b) the objectives of a project are intended to *"help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits."* As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD's programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD's continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use spaces (e.g., CHF, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

The project objectives presented in Section 2.4.3, *Project Objectives* accurately describe the underlying purpose of the proposed Project. Project Objectives 3, 4, and 5 describe the purposes of the proposed Project to provide flexible, multi-use spaces and specialized facilities to support the BCHD innovative and constantly evolving programs necessary to serve the future needs of the community. Specifically, these project objectives describe that the proposed Project is intended to provide public open space, integrated assisted living facilities, and a modern campus with meeting spaces for public gatherings and interactive education.

The project objectives presented in the EIR clearly meet the requirements of CEQA Guidelines Section 15124(b). It should also be noted that these project objectives have been appropriately used to develop a range of feasible alternatives that would substantially reduce significant impacts associated with the proposed Project while still accomplishing most of the basic project objectives (refer to Section 5.0, *Alternatives*). The EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only as the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), because it would reduce the total duration of the significant and unavoidable construction-related noise impact. This alternative would also incorporate an alternative circulation scheme that would avoid any potential conflicts associated with vehicle access along Flagler Lane. Further, this alternative addresses public concerns, at least in part, over the size and scope of the proposed Project.

*Comment FL1-34*

The comment contests the project objective to generate sufficient revenue through mission derived services to replace revenues that would be lost from discontinued use of the former Hospital Building and support the current level of programs and services. The comment asserts that BCHD is electively discontinuing use of the Beach Cities Health Center. The comment also contests the benefits of the Bluezoones and LiveWell kids program.

As described in Master Response 6 – Financial Feasibility/Assurances, while CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about environmental information, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

As described in the response to Comment FL1-32, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the campus. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

However, it should be noted that the elimination of seismic hazards is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. However, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. The combined cost of renovation and seismic retrofit would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. This issue is also discussed in Section 5.0, *Alternatives* as a part of the rationale for the development of Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) as well as Alternative 2 – Closure, Sale, and Redevelopment of the Campus.

*Comment FL1-35*

The comment restates the assertion that BCHD has no scientific quantitative basis to substantiate the open space needs. Refer to the response to Comment FL1-33 for a detailed response to comments pertaining to this issue. While there is no specific acreage requirement for the proposed open space, the proposed Healthy Living Campus Master Plan has sought to maximize the area of programmable open space and integrate it within the campus environment. This would result in a two-fold benefit of developing a publicly accessible amenity as well as reducing the overall development density of the campus.

*Comment FL1-36*

The comment contests the objective to address the growing need for assisted living. Refer to the response to Comment FL1-30 and Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the campus, referred to in the study as the Primary Market Area. Further, the comment does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. The comment also fails to acknowledge that

revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

*Comment FL1-37*

The comment restates a California Public Records Request for a definition of sufficient revenue to address growing community health needs. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). Nevertheless, a quantitative analysis of BCHD's services can be found in the Community Health Report (https://www.bchd.org/healthreport) as well as the Priority-Based Annual Budgets (https://www.bchd.org/operating-budgets).

*Comment FL1-38*

The comment restates that there are no laws or ordinances that require any retrofit or demolition and cites the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates in March 2018. As described in the responses to Comment FL1-32 and FL1-34 BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

The comment asserts that the proposed Project would have noise and vibration impacts on students at Towers Elementary School as well as impacts to surrounding residents from construction noise and emergency service vehicles. Each of these issues is addressed in detail with Section 3.11, *Noise* and is supported by detailed quantitative noise modeling. Temporary, but prolonged construction-

related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. However, as described in Impact NOI-1, Towers Elementary School would not experience significant construction-related noise impacts (refer to Table 3.11-16 and Table 3.11-17). As described under Impact NOI-3, the operations at the campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the RBMC and TMC. Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure substantially contribute to increases in noise pollution that could measurably result in health concerns.

*Comment FL1-39*

The comment restates California Public Records Requests for budgeting at a program level that consider public benefits and costs. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While the CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). Nevertheless, a quantitative analysis of BCHD's services can be found in the Community Health Report (https://www.bchd.org/healthreport) as well as the Priority-Based Annual Budgets (https://www.bchd.org/operating-budgets).

*Comment FL1-40*

The comment restates the assertion that there is no rationale for the size of the required open space. Refer to the response to Comment FL1-33 and FL1-35 for a detailed response to comments pertaining to this issue. While there is no specific acreage requirement for the proposed open space, the proposed Healthy Living Campus Master Plan has sought to maximize the area of programmable open space and integrate it within the campus environment. This would result in a two-fold benefit of developing a publicly accessible amenity as well as reducing the overall development density of the campus.

*Comment FL1-41*

This comment asserts that there is little need for the proposed Assisted Living program, selectively siting from the MDS market study. Refer to the responses to Comment FL1-3 as well as Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. Refer also to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

The MDS market study identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the campus, referred to in the study as the Primary Market Area. At the request of BCHD, Cain Brothers independently reviewed the market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. Further, the comment focuses on the proposed Assisted Living program and does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

With regard to the assertion that the proposed Project would result in Environmental Justice impacts, refer to the response to Comment FL1-18. According to OEHHA CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. While not specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

*Comment FL1-42*

The comment asserts that BCHD has provided no quantitative analysis of net benefits to the Beach Cities in response to California Public Records Requests. The comment asserts that this invalidates the project objective to redevelop the site to create a modern Healthy Living campus with public open space and facilities designed to meet the future health needs of residents, including a

Community Wellness Pavilion with meeting spaces for public gatherings and interactive education. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While the CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

As described in CEQA Guidelines Section 15093, *"CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project."* If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall *"state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record"* (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

*Comment FL1-43*

The comment asserts that BCHD has provided no quantitative analysis of net benefits to the Beach Cities in response to California Public Records Requests. The comment asserts that this invalidates the project objective to generate sufficient revenue through mission-derived services or facilities to address growing future community health needs. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While the CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

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*environmental risks when determining whether to approve the project."* If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall *"state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record"* (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

*Comment FL1-44*

The comment restates that there are no laws or ordinances that require any retrofit or demolition and cites the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates in March 2018. As described in the response to Comment FL1-32, FL1-34, and FL1-38 BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the campus. However, recognizing that in addition to escalating maintenance costs, the structures pose a potential future public safety hazard for building tenants, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

The comment asserts that the proposed Project would have noise and vibration impacts on students at Towers Elementary School as well as impacts to surrounding residents from construction noise and emergency service vehicles. Each of these issues is addressed in detail with Section 3.11, *Noise* and is supported by detailed quantitative noise modeling. Temporary, but prolonged construction-related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. However, as described in Impact NOI-1, Towers Elementary School would not experience significant construction-related noise impacts (refer to Table 3.11-16 and Table 3.11-17). As described under Impact NOI-3, the operations at the campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR,

which are based on the requirements of the RBMC and TMC. Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure substantially contribute to increases in noise pollution that could measurably result in health concerns.

*Comment FL1-45*

The comment incorrectly claims that the EIR ignores much of the public concern regarding impacts. Contrary to this assertion, the summary provided in Section 1.8, *Areas of Known Public Controversy*, clearly complies with the intent of CEQA Guidelines Section 15123, which is referenced in the comment and states that *"[a]n EIR shall contain a brief summary of the proposed actions and its consequences."* The summary provides approximately 2 pages of bulleted issues that were known to be of concern during the preparation of the EIR. Additionally, as described in Section 1.8, *Areas of Known Public Controversy*, all comments letters received on the Notice of Preparation (NOP) were also provided as Appendix A to the EIR. Each of these comment letters was reviewed and marked up to identify individual environmental issues. Each of these issues was considered and responded to during the preparation of the environmental impact analysis provided in the EIR. The assertion that BCHD ignored much of the public concern regarding impacts is unfounded.

*Comment FL1-46*

The comment asserts that the EIR ignores the perimeter impacts of construction, impacts associated with nighttime lighting and glare, the elevated height of the Project site and the associated visual impacts related to building height, issues regarding the total building square footage, and issues related to the size of the proposed parking structure.

First, it is important to note that each of the environmental issues raised in this comment were addressed in the EIR. Visual impacts – including potential impacts relating to building height, which also considered the topography of the Project site and the surrounding area – were addressed in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 and Impact VIS-2. Impacts related to nighttime lighting and glare were addressed in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3. Perceptions that the total square footage described in the proposed Project are still too big, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

The comment also asserts that these environment issues would result in negative health impacts. However, the provided citations do not provide a clear connection between the environmental issue raised in the comment and the purported negative health impacts. For example, the study

connecting nighttime lighting to cancer, *Missing the Dark: Health Effects of Light Pollution* is a broad review of light pollution. This literature review regularly references example locations (e.g., Manhattan or Las Vegas) that are not comparable to the area surrounding the campus. The individual studies referenced in this literature review are also not generally applicable to the proposed Project or the area surrounding the campus. For example, the literature review cites a 1995 study that *"examined female employees working a rotating night shift and found that an elevated breast cancer risk is associated with occupational exposure to artificial light at night."* The construction of limited downcast security lighting in compliance with the RBMC and TMC cannot be compared with studies addressing occupational light exposure. The review also cites a 2008 study that found *"[w]omen living in neighborhoods [of Israel] where it was bright enough to read a book outside at midnight had a 73% higher risk of developing breast cancer than those residing in areas with the least outdoor artificial lighting."* Again, the construction of limited downcast security lighting in compliance with the RBMC and TMC would not result in a substantial or comparable change in nighttime lighting. The review even acknowledges that, *"[t]he health effects of light pollution have not been…well defined for humans."* As such, this literature review does not meet the definition of substantial evidence provided in CEQA Guidelines 15384.

Similarly, the literature review referenced for the issue of depression, *Timing of light exposure affects mood and brain circuits* also has limited applicability to the proposed Project. For example, when discussing depression, this literature review cites jet lag, seasonal changes in day length, a 2007 study during which rats were housed in constant light, epidemiological studies related to nighttime shift work, etc. The review specifically notes, *"[i]n humans, the incidence of major depression has grown in parallel with the adoption of electric lights, but this is only correlation."* Again, this literature review does not meet the definition of substantial evidence provided in CEQA Guidelines 15384.

References related to glare provide broad reviews of potential impacts associated with glare, including impediment to vision, fatigue, etc. However, the findings of these reviews do not conflict with or challenge any specific aspects of the analysis provided in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3.

The same is true for the each of the other studies that have been referenced, which do not provide any clear link between the proposed Project and the purported health impacts. The reference linking shade and shadows to cognitive impairment, *Severe Urban Outdoor Air Pollution and Children's Structure and Functional Brain Development, From Evidence to Precautionary Strategic Action* does not even reference shade or shadows. The reference linking nighttime lighting to mental disorder, *Sunshine, Serotonin, and Skin: A Partial Explanation for Seasonal*

*Pattens in Psychopathology*, specifically addresses season exposure to sunlight and also does not reference shade or shadows. Again, none of these studies or literature reviews meet the definition of substantial evidence provided in CEQA Guidelines 15384.

*Comment FL1-47*

The comment incorrectly claims that the EIR ignores requests to expand the area of concern to the City of Torrance, including Tomlee Avenue, Towers Street, Mildred Avenue, and Redbeam Avenue. The comment also incorrectly claims that the EIR ignores future operational air emissions and traffic emissions on surrounding residents and studies. As shown in Table 3.2-4 the EIR clearly considers sensitive receptors located to the east of the campus in the City of Torrance. The EIR conservatively assesses potential impacts to the nearest sensitive receptor located 80 feet from the edge of the campus. The EIR also clearly considers adjacent recreational land uses and schools – including Towers Elementary School located at a distance of 350 feet from the edge of the campus. Impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction-related HRA.

*Comment FL1-48*

This comment asserts that issues regarding displaced wildlife and vermin infestations have been ignored. Issues related to rodents are discussed in the EIR, which notes that *"[d]ue to the presence of the Silverado Memory Care Community and associated dining services on the campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus."* In light of this ongoing program, assertions that the proposed Project would result in vermin infestations is unfounded and speculative.

*Comment FL1-49*

This comment states that issues regarding nuclear/radioactive medical waste have been ignored. This issue has been addressed in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-1. As described therein, medical wastes generated on-site would continue to be disposed of

in special containers located in a secure area of the facility and would be collected regularly. All hazardous materials used on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. As described in Section 3.8.2, *Regulatory Setting*, hazardous chemical and biohazardous materials management laws in California include the following statutes:

- Hazardous Waste Control Act;
- Medical Waste Management Act;
- Hazardous Materials Release Response Plans and Inventory Act;
- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65);
- Hazardous Substances Act;
- Hazardous Waste Management Planning and Facility Siting (Tanner Act);
- Porter Cologne Water Quality Control Act;
- Title 23 of the California Code of Regulations (CCR) Division 6, Chapter 16: Underground Storage Tank Regulations;
- Title 22 of the CCR: Hazardous Waste;
- Title 8 of the CCR, Section 1529: Asbestos;
- California Public Resources Code (PRC) – Article 4.2 Hazardous Wells Section 3255; and
- SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.

*Comment FL1-50*

The comment incorrectly states that noise and vibration at Towers Elementary School are not considered in the EIR. Section 3.11, *Noise* clearly discusses and quantifies the potential noise impacts at Towers Elementary School. First, it is important to note that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east, exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Further as described in Section 3.11, *Noise* under Impact NOI-2, ground-borne vibration levels generated during construction would not affect or be noticeable to any sensitive receptors during construction. As such, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the campus. However, the indoor learning environment is separated from the campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management

Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. Additionally, at least 1 month prior to the initiation of construction-related activities during Phase 1 and Phase 2, BCHD shall prepare and distribute notices to those located within a 0.25-mile radius. As described in the response to Comment KB-4, BCHD is committed to ongoing coordination and revisions to the construction schedule, as feasible, ahead of and during the proposed construction activities, to protect and maintain the indoor learning environment at Towers Elementary School.

At least some of the references provided in the comment address issues related to air quality, including *Air particulate matter and cardiovascular disease: the epidemiological, biomedical and clinical evidence*. For issues related to temporary, but prolonged construction-related air quality impacts as they related to Towers Elementary School refer to the response to Comment FL1-47. None of the other references conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* including the detailed quantitative noise modeling effort. For example, the Education Week article, *Low-Level Classroom Noise Distract, Experts Say*, provides a broad review of classroom noise issues, and does not provide an agreed upon quantitative noise level at which interruption of learning occurs. The decibel levels that are cited in the article – 60 dBA (i.e., normal conversational noise) and a 10-dBA increase – would not be met or exceeded as a result of construction-related activities. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. The literature review, *Kids in Noisy Classrooms: What does the Research Really Say*, specifically acknowledges *"[m]ost conclusions on the different effects of the types of noise have largely been inferred from adult studies or not investigated in a systematic manner for children. In addition, noise typical of 'real-life schools' have not been the focus of this type of research."* None of the referenced studies or literature reviews suggest the application of a different thresholds for temporary, but prolonged construction-related noise.

*Comment FL1-51*

The comment incorrectly states that the EIR miscategorized the impact as population and housing. Contrary to this assertion, impacts related to emergency response are addressed in Section 3.13, *Public Services*. Issues related to siren noise are addressed in Section 3.11, *Noise*. As described under Impact NOI-3, the development of Phase 1 of the proposed Healthy Living Campus Master

Plan would incrementally increase the total number of individuals requiring ambulance services through the proposed addition of 177 new Assisted Living bed spaces to the existing 120 Memory Care bed spaces, bringing the total permanent residents supported at the site to 297. Based on an assumed average of 0.82 annual calls per bed space per year to the existing campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). When sirens are necessary for an emergency response, they typically emit noise at a magnitude of approximately 100 dBA at 100 feet. A decrease of approximately 3 dBA occurs with every doubling of distance from a mobile noise source. Therefore, during a response requiring sirens, residences along North Prospect Avenue and Beryl Street experience peak short-duration exterior noise levels between 91 and 100 dBA. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic. Thus, given the infrequent and short duration of siren utilization responding to emergency situations, noise impacts from emergency vehicles would be both negligible and less than significant.

None of the other references conflict with or challenge any specific aspects of the analysis related to emergency services. For example, neither the article *How Stress Makes Us Sick and Affects Immunity, Inflammation, Digestion* nor the literation review *Chronic stress: a critical risk factor for atherosclerosis* address noise or more specifically siren noise. The literature review does provide one fleeting reference to siren noise, however, neither the literature review, nor the references provide any substantial evidence that an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in health impacts.

*Comment FL1-53*

The comment incorrectly claims that the EIR ignores issues related to emergency, police, and fire services. However, contrary to this assertion, issues related to each of these public services are provided in Section 3.13, *Public Services*.

*Comment FL1-54*

This comment incorrectly claims that the EIR ignores potential impacts to recreation, citing a lack of discussion on shade and shadows at Towers Elementary School. As described in Section 4.5, *Effects Found Not to Be Significant*, because the proposed Project would expand open space and recreational facilities, the proposed Project may substitute the demand for the City's already substantial recreational facilities (e.g., parks, beaches, open space, etc.). Because the proposed Project would not substantially increase demand on recreational facilities, potential impacts to

recreational resources would be considered less than significant. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions. Additionally, impacts to Towers Elementary School related to shade and shadows are addressed in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-4. As described therein, during the Fall and Winter, the proposed RCFE Building would cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). The latest dismissal time for Towers Elementary School students is at 3:12 p.m. for 4$^{th}$ and 5$^{th}$ graders; however, and Towers Elementary School closes at 4:00 p.m. Therefore, shadows cast by the proposed RCFE Building would not have a significant adverse effect on Towers Elementary School. The comment does not challenge any specific aspects of the analysis of this analysis.

*Comment FL1-55*

The comment asserts that the EIR does not address issues related to school drop-off/pick-up or other general traffic impacts during construction and operations. First, it should be noted that pursuant to SB 743 and CEQA Guidelines Section 15064.3, vehicle miles travel (VMT) has replaced roadway capacity-based or automobile delay-based level of service (LOS), as the metric for transportation impact analysis (refer to Section 3.14, *Transportation*). Nevertheless, the EIR acknowledges that construction-related activities could disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation. For additional discussion and a detailed response to comments pertaining to construction-related impacts, refer to Master Response 13 – Transportation Analysis.

It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

*Comment FL1-56*

The comment asserts that BCHD underreports and minimizes aesthetic impacts associated with the proposed Project. Each of these issues are addressed in detail is the response to Comments FL1-57 through FL1-59.

*Comment FL1-57*

The comment claims that the proposed Project would result in illegal taking of blue sky views and asserts that the EIR does not assess a maximum elevation on West 190th Street, does not provided sufficient key viewing locations, does not illustrate the proposed Project without landscaping, and fails to provide simulations of development under Phase 2.

The comment does not provide any citations, legal or otherwise, that the support the assertion that the proposed Project would result in illegal taking of blue sky views. With regard to maximum elevation views along West 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190th Street that provide slightly elevated views – including the intersection of Prospect & West 190th Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource. With regard to the requested analysis of additional representative views, CEQA Guidelines Section 15204 clearly states: *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."* As previously described, the six representative views offer a range of public views from public streets, sidewalks, and recreational resources within the vicinity of the Project site. The landscaping included in the proposed Project is described in Section 2.0, *Project Description* and shown in Figure 2-7. As described further in Section 3.3, *Biological Resources*, the proposed landscaping plan would replace this existing landscaped vegetation with new vegetation that meets the landscaping regulations provided in RBMC Section 10-2.1900. Additionally, the proposed tree removal and the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane. Contrary to the comment's assertion, the landscaping shown

in the photosimulations is not fake, and instead is a result of careful coordination between VIZf/x and the Landscape Architects. Lastly, the visual impact analysis relies on the best available information for the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights.

*Comment FL1-58*

The comment claims that the proposed Project would result in illegal taking of recreation and sunlight. The comment states that the shade and shadow analysis is insufficient and fails to provide hourly data and fails to evaluate the effects of shading on recreation and health.

Refer to Master Comment 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows. Shade and shadow simulations were prepared for the proposed Project using a computer-generated 3D model to identify the height and bulk of proposed building elements, mapping the footprint (i.e., location, shape, and size) of the Project site, and then calculating and diagramming the shadows that would be cast by the building components during the most extreme, or conservative, conditions (see Appendix M). The analysis simulates shadows for the Summer Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 6:00 p.m., for the Autumnal (Fall) Equinox at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., 4:00 p.m., and 5:00 p.m., and for the Winter Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 4:00 p.m. By modeling shadows for the Autumnal Equinox and the Summer and Winter Solstices, it is possible to see and analyze the worst and best-case scenarios of future shadow effects. None of the shade and shadows impacts – including impacts to adjacent residences or Towers Elementary School – would exceed the thresholds established in the EIR, that a significant shade and shadow impact would occur *"if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October)."*

With regard to the claim that shading associated with the proposed Project would result in health impacts, refer to the detailed discussion provided in the response to Comment FL1-47. With regard to the claim that shading would result in vehicle safety impacts, no substantial evidence has been provided to demonstrate a fair argument that shading would result in a hazardous impact on the surrounding transportation network.

*Comment FL1-59*

The comment asserts that the existing campus employs non-directional lighting and that lighting is left on all day. The comment claims that neighbors have issued complaints regarding lighting (and other issues related to nighttime glare and noise) since 2000. The comment goes on to claim that this is evidence that BCHD cannot comply with the RBMC.

Issues related to nighttime lighting are addressed in Impact VIS-1 and Impact VIS-3. As described therein, outdoor lighting would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with RBMC Section 92.30.5 and these design guidelines. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. It should be noted that the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. During this review, the proposed lighting as well as the other reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare consistent with the requirements of the RBMC.

With regard to the claim that shading associated with the proposed Project would result in health impacts, refer to the detailed discussion provided in the response to Comment FL1-47.

*Comment FL1-60*

The comment asserts that the EIR minimizes the impacts of particulate matter as it relates to construction and operation of the proposed Project. Refer to the response to Comment FL1-47 as well as Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to particulate matter emissions as well as other criteria air pollutant emissions and toxic air contaminants (TACs). As described therein impacts associated with temporary, but prolonged construction-related impacts are addressed in Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related

emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction-related HRA.

*Comment FL1-61*

The comment asserts that air emissions associated with the proposed Project – particularly the parking structure proposed as a part of Phase 2 development – could create premature Alzheimer's in children. Operational air quality impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. Refer to the response to Comment FL1-12 for a detailed discussion and response to comments pertaining to this issue. As described therein, the comment fails to acknowledge the extensive quantitative modeling provided under Impact AQ-3, which demonstrates that operational criteria air pollutant emissions, including mobile source emissions associated with vehicle trips to and from the Project site, would not exceed the SCAQMD's LST, which account for potential human health effects from criteria air pollutants.

The references provided in this comment do not support a conclusion that construction or operational emissions would result in health impacts. For example, the study *The associated of early-life exposure to ambient $PM_{2.5}$ and later-childhood height-for-age in India: an observational study* describes that children in the sample were exposed to an average of 55 micrograms per cubic meter ($\mu g/m^3$) of $PM_{2.5}$ in their birth month. For reference, the construction HRA demonstrates that the maximum unmitigated concentration of $PM_{2.5}$ would be 0.41021 $\mu g/m^3$, whereas the maximum mitigated concentration would be 0.02373 $\mu g/m^3$. These emissions, which would occur temporarily during the Phase 1 construction activities, would represent the maximum $PM_{2.5}$ emissions that could be experienced during construction or operation of the proposed Project. Similarly, the study *Severe Urban Outdoor Air Pollution and Children's Structural and Functional Brain Development, From Evidence to Precautionary Strategic Action* cite a World Health Organization (WHO) safety cut off of <10 $\mu g/m^3$. Neither construction-related nor operational emissions of $PM_{2.5}$ would approach these values. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction-related HRA.

*Comment FL1-62*

The comment asserts that BCHD underreports and minimizes noise impacts. Each of these issues are addressed in detail is the response to Comment FL1-63 and FL1-64.

*Comment FL1-63*

The comment claims that the use of the 8-hour continuous noise level ($L_{eq}$) metric is inappropriate for evaluating noise and vibration impacts, particularly when it comes to students with Individualized Education Program (IEPs) and 504 Plans. The comment goes on to claim that haul trucks, which typically generate traffic noise levels of 85 dBA $L_{max}$ at 50 feet, would create a distraction to students.

First, it is important to note that the threshold of significance for noise impacts identified in the EIR is based on FTA *Transit Noise and Vibration Impact Assessment Manual*, which states that an $L_{eq}$ of 80 dBA and a 30-day average of 75 dBA $L_{dn}$ is a reasonable criterion for assessment of construction activities on residential land use. As described in the EIR, this unit of measurement is appropriate because $L_{eq}$ can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,
- Average noise over all phases of the construction.

Given the duration of construction activities associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program, the noise metric $L_{dn}$, averaged over 30-days, was also assessed.

It should be noted that the typical ranges of $L_{max}$ at 50 feet for typical construction equipment that would be used during construction are disclosed in Table 3.11-15. As described in Section 3.11.4, *Impact Assessment and Methodology*, construction noise levels at on- and off-site locations were estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model where inputs included distance from construction equipment to receptor, equipment types, and usage factor, which is presented as a percentage of the equipment operating at full power within a given time frame. $L_{max}$ noise levels for each piece of heavy construction equipment were considered as inputs during the preparation of the noise analysis. However, as a matter of common practice, construction impact analyses does not make findings based on $L_{max}$ alone. This is because construction-related noise levels fluctuate with each construction activity (e.g., demolition,

grading, foundation construction, framing, interior work, etc.) as well as the specific location of heavy construction equipment and the duration of use.

Further, the comment does not suggest any specific threshold related to $L_{max}$. As described in Section 3.11.3, *Regulatory Setting*, construction activities are permitted in Redondo Beach between 7:00 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (RBMC Sections 4-24.503 and 9-1.12). Similarly, construction activities are permitted in Torrance between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (TMC Section 6-46.3.1). Neither of the local noise ordinances establish quantitative noise limits or other standards for construction. For that reason, the Detailed Analysis Construction Noise Criteria presented in the FTA's *Transit Noise and Vibration Impact Assessment Manual* have been used as a reasonable criteria for assessment and if exceeded, could result in adverse community reaction. Pursuant to CEQA Guidelines Section 15064.7(b) lead agencies have discretion to formulate their own significance thresholds and may use thresholds on a case-by-case basis. CEQA Guidelines Section 15064.7(c) states that *"[w]hen using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency…is supported by substantial evidence."* The use of the FTA Detailed Analysis Construction Noise Criteria clearly meets these requirements.

With regard to the assertion that haul truck trips would cause a distraction to students, it should be noted that due to the logarithmic nature of noise, the addition of haul truck trips generating traffic noise levels of 85 dBA $L_{max}$ at 50 feet, would increase existing daytime traffic noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School.

*Comment FL1-64*

The comment asserts that exposure to noise constitutes a health risk and provides a reference to a literature review entitled *Noise Exposure and Public Health*. The comment provides an excerpt of the abstract from the literature review, but fails to describe any connection between the literature review and the proposed Project or the potential environmental impacts resulting from the implementation of the proposed Project. Upon further investigation, the literature review generally discusses the health effects of occupational and environmental noise exposure. The review specifically states the emphasis *"is on chronic environmental noise exposures, particularly those due to traffic and industrial noises."* The review cites noise from traffic, railroad, aircraft activity, industrial noise. The review provides no mention of construction-related noise and only one

fleeting mention of a study of impulsive noise in which was $L_{eq}$ averaged over a period of 24 hours. There is no clear connection between the literature review and the potential impacts of construction on the issues raised in the comment, including hearing impairment, hypertension and ischemic heart disease, annoyance, sleep disturbance, and decreased school performance. With respect to annoyance in particular, the literature review states that *"the degree of annoyance experienced by an individual as well as that on a population level in practice can differ considerably from the exposure-response relationships…because of the influence of so-called non-acoustical factors."*

*Comment FL1-65*

The comment claims that the EIR under reports and minimizes impacts on recreation and cites perceived illegal taking of recreation from Towers Elementary School, illegal taking of sunlight from adjacent land uses, and failure to provide hourly shade and shadow studies. Refer to the response Comment FL1-58 and Master Comment 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows.

With regard to the claim that shading associated with the proposed Project would result in health impacts, refer to the detailed discussion provided in the response to Comment FL1-47. With regard to the claim that shading would result in vehicle safety impacts, no substantial evidence has been provided to demonstrate a fair argument that shading would result in a hazardous impact on the surrounding transportation network.

*Comment FL1-66*

The comment claims that the EIR under reports and minimizes impacts related to traffic and transportation. However, the comment goes on to restate issues related to noise, which were responded to in the response to Comment FL1-63.

*Comment FL1-67*

The comment incorrectly asserts that there was no comprehensive analysis of daily commutes associated with the RCFE and PACE facility. The comment goes on to state that there has been no comprehensive analysis of daily commutes associated with the proposed development under Phase 2. As described further in Master Response 13 – Transportation Analysis, despite the assertions of the comment, the EIR clearly does include comprehensive analysis of impacts to transportation that could occur as a result of the proposed Project. In fact, the EIR includes an exhaustive trip generation analysis that specifically identifies trip generation rates for the Assisted Living program and PACE components of the proposed Project, including residents, patients, visitors, and staff. It should be noted that the trip generation analysis determined that trip

generation would be negative following the implementation of Phase 1, but would increase slightly by 376 new daily trips as compared with existing conditions during Phase 2.

As thoroughly described in Section 3.14.3, *Impact Assessment and Methodology*, Fehr & Peers began with the standard Institute of Transportation Engineers (ITE) trip generation rates, which represents the industry standard for estimating trip generation and is based on a compilation of empirical (i.e., observed) trip generation surveys at locations throughout the country. While ITE Trip Generation is a defensible approach, ITE always recommends utilizing local data where it is available. Therefore, Fehr & Peers calibrated these rates by incorporating driveway counts, pedestrian surveys, CHF membership scans, BCHD programming information, and market feasibility studies.

Fehr & Peers also obtained average trip length data for the campus using StreetLight location-based service data from 2019, prior to the onset of the COVID-19 pandemic. Using the StreetLight portal, Fehr & Peers mapped the relative weight of the origin/destination grid cells to and from the campus, which revealed that the average weekday trip length to and from the campus is 6.4 miles, and the average weekend trip length is 6.3 miles. Given that the proposed Project would redevelop the existing campus with uses that would continue to serve the Beach Cities and surrounding South Bay communities, existing trip lengths are likely to remain similar under the proposed Project. StreetLight data were also evaluated for Brookdale South Bay located at 5481 West Torrance Boulevard in Torrance. Fehr & Peers calculated an average trip length of 4.8 miles using the StreetLight data for Brookdale South Bay. These data supported the findings of less than significant impacts to VMT.

The comment does not challenge any specific aspects of this trip generation analysis or provide any substantiating evidence to further support its assertions.

*Comment FL1-68*

The comment cites an article *Lockdown lessons Blue Zones founder Dan Buettner on how to make use of staying at home* and states that BCHD should act consistently with the Blue Zones program. The article discusses jobs, diet, and social connectedness; however, the comment does not make a clear connection between the article, the proposed Project, or the environmental impact analysis provided in the EIR.

*Comment FL1-69*

The comment provides citations to various studies and literature reviews related to noise, chronic stress, and negative health impacts. However, beyond discussing the issue of noise, neither the

comment, nor any of the referenced studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk* discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. Similarly, *Noise Annoyances Associated with Depression and Anxiety in the General Population – The Contribution of Aircraft Noise* addresses a small cohort of 15 participants, age 35 to 74 year, in western Mid-Germany, and assesses their annoyances for road traffic, aircraft, railways, industrial, neighborhood indoor and outdoor noise. The study found that aircraft noise was by far most prominent affecting the population. These studies provide no detailed analysis of construction-related noise or other impulsive noise sources (e.g., heavy construction equipment). With respect to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. None of the referenced studies or literature reviews conflict with this analysis or suggest the application of a different thresholds roadway noise.

*Comment FL1-70*

The comment provides citations to various studies and literature reviews related to traffic noise, traffic related air pollution and stress. However, beyond discussing the issues of traffic, noise, and air quality neither the comment, nor any of these studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Chronic traffic noise stress accelerated brain impairment and cognitive decline in mice*, discusses roadway noise and its relationship to light/dark cycles. Similarly, *Traffic Noise and Mental Health: A Systematic Review and Meta-Analysis* includes a systematic literature search and summary of evidence for road, railway, or aircraft noise-related risks of depression, anxiety, cognitive decline, and dementia among adults. This study in particular found that aircraft noise exposure increases the risk for depression, but otherwise did not detect statistically significant risk increases due to roadway and railway traffic noise or for anxiety. *Traffic-Related Air Pollution and Stress: Effects on Asthma* provides very specific clarifications on another study *Chronic Traffic-Related Air Pollution and Stress Interact to Predict Biologic and Clinical Outcomes in Asthma*. This latter study determined that physical and social environments interacted, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress. Importantly, this study did not measure any increases in stress in children as a result of traffic. Additionally, the study acknowledges limitations including small sample size, varying time frame for measures, and pollution estimates using land using models that are best suited for long-term exposure.

As described in the response to Comment FL1-67 as well as Master Response 14 – Transportation Analysis, the EIR provided a detailed trip generation analysis and an exhaustive quantitative modeling effort. Implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). This is in part because Phase 1 of the proposed Project would replace high trip generating land uses (e.g., medical office) with lower trip generating land uses (e.g., Assisted Living units). This reduction in daily vehicle trips as a result of Phase 1 is also attributed to the demolition of most of the existing uses within the Beach Cities Health Center and the construction of only a small portion of the proposed Healthy Living Campus Master Plan. After completion of Phase 2, however, the proposed Project is expected to generate a total of 3,360 daily vehicle trips, including 271 AM peak period trips and 195 PM peak period trips (refer to Table 3.14-7). After accounting for existing trips being removed from the roadway network, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate a net increase of 376 new daily trips as compared with existing conditions.

None of the referenced studies suggest that this level of operational traffic would result in traffic-related stress, noise, or air quality impacts. With regard to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. With regard to transportation-related air quality impacts, the quantitative analysis demonstrates that criteria air pollutant emissions and TACs would be less than SCAQMD's thresholds.

*Comment FL1-71*

The comment provides citations to two studies related to sirens, chronic stress, and post-traumatic stress disorder. related to traffic noise, traffic related air pollution and stress. *The acute physiological stress response to an emergency alarm and mobilization during the day and at night* addressed occupational hazards for firefighters related to emergency alarm and mobilization during daytime and the nighttime hours. *Impact of Stressful Events on Motivations, Self-Efficacy, and Development Post-Traumatic Symptoms among Youth Volunteers in Emergency Medical Services*, addresses Israeli Emergency Medical Service (EMS) personal that have been exposed to potentially traumatic events, including mass terror attacks. This study aims to identify how those events affect young volunteers in an effort to help find ways to empower the volunteers and increase their resilience. Neither of these studies are directly applicable to residents that are exposed to siren noise. Based on an assumed average of 0.82 annual calls per bed space per year

to the existing campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). This study does not provide any substantial evidence that an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in health impacts.

*Comment FL1-72*

The comment provides citations to two literature review related to the physiological impacts of stress. *Neurobiological and Systemic Effects of Chronic Stress* identifies the many body systems affected by stress, discusses key physiological mechanisms, and generally discusses social and physical environmental influences and interventions related to stress. Similarly, *The impact of stress on body function: A review* also provides an overview of the major effects of stress on the primary physiological systems of humans. Neither the comment nor these literature reviews provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. For example, neither of these literature reviews mention construction, noise, traffic, etc. or other issues that have been raised in the other comments addressed above.

**Letter FL2**

*Comment FL2-1*

The comment claims that the Beach Cities Health District (BCHD) has asserted an obligation to protect the health of the community beyond any published standards, laws, or ordinance. Although these comments do not address the adequacy of the Environmental Impact Report (EIR), as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment FL2-2*

The comment asserts that the proposed Project would result in impacts to aesthetics and associated negative health impacts. However, consistent with CEQA Guidelines 15204(b), "*if persons…believe that the project may have a significant effect, they should:*

*(1) Identify the specific effect,*

*(2) Explain why they believe the effect would occur, and*

*(3) Explain why they believe the effect would be significant"*

As described in CEQA Guidelines Section 15204(c), *"[r]eviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence."* The comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

*Comment FL2-3*

The comment asserts that the implementation of the proposed Project would in impacts to air quality and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR. In particular, the comment does not challenge the exhaustive quantitative air emissions modeling, including the construction Health Risk Assessment (HRA) prepared by iLanco.

*Comment FL2-4*

The comment asserts that the implementation of the proposed Project would result in purported impacts to land use and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

*Comment FL2-5*

The comment asserts that the implementation of the proposed Project would result in impacts to noise and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR. In particular the comment does not challenge the exhaustive noise modeling prepared in support of the EIR's noise analysis.

*Comment FL2-6*

The comment asserts that the implementation of the proposed Project would result in negative impacts to recreation and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

*Comment FL2-7*

The comment asserts that the implementation of the proposed Project would result in purported impacts to traffic and associated negative health impacts. However, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR. In particular, the comment does not challenge the Vehicle Miles Traveled study or the the Non-CEQA Intersection Operational Evaluation prepared by Fehr & Peers.

*Comment FL2-8*

The comment provides a variety of links to studies, literature reviews, and other articles related to chronic stress. These articles are also identified in Comment MN106-19. However, as described in the individual response to Comment MN106-19, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, the article *Lockdown lessons Blue Zones founder Dan Buettner on how to make use of staying at home*, which is also identified in Comment FL-1, states that BCHD should act consistently with the Blue Zones program. The article discusses jobs, diet, and social connectedness; however, the comment does not make a clear connection between the article and the purported impacts associated with the proposed Project.

*Comment FL2-9*

The comment provides a variety of links to studies, literature reviews, and other articles related to increased cardiovascular risk from noise. These articles are also identified in Comment MN106-18. However, as described in the individual response to Comment MN106-18, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk*, which is also identified in Comment FL1-69, discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. This study provides no detailed analysis or discussion of construction-related noise or other impulsive noise sources (e.g., heavy construction equipment). None of the referenced studies or literature reviews conflict with this analysis or suggest the application of a different thresholds for roadway noise.

*Comment FL2-10*

The comment provides a variety of links to studies, literature reviews, and other articles discussing traffic-induced chronic stress associated with air emissions and noise. These articles are also identified in Letter MN106-18. However, as described in the individual responses to this letter this

comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Chronic traffic noise stress accelerated brain impairment and cognitive decline in mice*, which is also discussed in Comment FL1-70, discusses roadway noise and its relationship to light/dark cycles. Additionally, *Traffic Noise and Mental Health: A Systematic Review and Meta-Analysis*, which is also discussed in Comment FL1-70, includes a systematic literature search and summary of evidence for road, railway, or aircraft noise-related risks of depression, anxiety, cognitive decline, and dementia among adults. This study in particular found that aircraft noise exposure increases the risk for depression, but otherwise did not detect statistically significant risk increases due to roadway and railway traffic noise or for anxiety. *Traffic-Related Air Pollution and Stress: Effects on Asthma* provides very specific clarifications on another study *Chronic Traffic-Related Air Pollution and Stress Interact to Predict Biologic and Clinical Outcomes in Asthma*. This latter study determined that physical and social environments interacted, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress. Importantly, this study did not measure any increases in stress in children as a result of traffic. Additionally, the study acknowledges limitations including small sample size, varying time frame for measures, and pollution estimates using land using models that are best suited for long-term exposure.

*Comment FL2-11*

The comment provides a links to a study that explores the associations between outdoor nighttime lights and sleep patterns in the human population. However, this study, *Artificial Outdoor Nighttime Lights Associate with Altered Sleep Behavior in the American General Population,* does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. This study involved a telephone survey with questions on life and sleeping habitats, the results of which were then compared to outdoor nighttime light satellite measurements. The conclusions of the study specifically note that the results are purely observational: *"We found several significant associations with outdoor nighttime lights and sleep behaviors but because of the nature of this study, actual level of lights could not be assessed. We did not ask for the presence of curtains in the bedroom windows and the opacity of the curtains nor for the use of a sleeping mask. As our results show, there are also other environmental factors than outdoor lights that were associated with alterations in sleep behaviors; for example, the presence of young children or occupation status."* The comment does not make any clear connections between the article and the proposed downcast lighting, which would be designed to be consistent with the requirements of the Redondo Beach Municipal Code (RBMC) as well as the Torrance Municipal Code (TMC) for light fixtures within the City of Torrance right-of-way.

*Comment FL2-12*

The comment provides a variety of links to studies, literature reviews, and other articles relate\d to increased cardiovascular risk from noise. These articles are also identified in Comment MN106-5. However, as described in the individual responses to this letter this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, the study *Road Traffic Safety: An analysis of the cross-effects of economic road and population factors* describes data collected on traffic accidents in 31 provinces and cities in China from 2004 to 2016 and concludes the increase of gross domestic product and traffic investment can significantly reduce the number of road traffic casualties in China. The studies regarding pedestrian safety largely provide quantitative analysis of demographics of pedestrian injury and mortality rates. None of the referenced studies or articles conflict with the EIR's analysis or suggest an element of the proposed Project would result in a significant environmental impact.

*Comment FL2-13*

The comment provides a variety of links to studies, literature reviews, and other articles related to traffic-induced health hazards. These articles are also identified in Comment MN106-6. As described in the response to Comment MN 106-6, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. Master Response 10 – Air Quality Analysis describes the exhaustive air quality modeling effort that was conducted to evaluate construction and operational air emissions associated with the proposed Project. Construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts, including mobile source emissions associated with vehicle trips to and from the Project site, are addressed under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of Mitigation Measure (MM) AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District's (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD mass daily significance thresholds for operation. which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

*Comment FL2-14*

The comment provides a variety of links to studies, literature reviews, and other articles related to emergency vehicle noise. These articles are also identified in Comment MN106-7. As described

in the response to Comment MN 106-7, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The acute physiological stress response to an emergency alarm and mobilization during the day and at night*, which is also referenced in Comment FL-71, addressed occupational hazards for firefighters related to emergency alarm and mobilization during daytime and the nighttime hours. This study is not directly applicable to residents that are exposed to siren noise. Based on an assumed average of 0.82 annual calls per bed space per year to the existing BCHD campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). This study does not provide any substantial evidence that an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in health impacts.

*Comment FL2-15*

The comment provides a variety of links to studies, literature reviews, and other articles related to potential health impacts associated with window glare. These articles are also identified in Comment MN106-8. As described in the response to Comment MN 106-8, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding glare.

*Comment FL2-16*

The comment provides a variety of links related to shade and shadow impacts. These articles are also identified in Letter MN106-9. However, as described in the individual responses to this letter these comments do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Place value: place quality and its impact on health, social, economic and environmental outcomes*, describes a general link between place quality and link to health, social, economic, and environment effects. The EIR includes detailed consideration and analysis of Project impacts to shade and shadow effects in Section 3.1, Aesthetics and Visual Resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further detail on impacts to these issues. Neither the comment nor the citations provide any clear detail that would suggest the EIR analysis is insufficient.

*Comment FL2-16*

The comment provides a variety of links related to shade and shadow impacts. These articles are also identified in Letter MN106-9. However, as described in the individual responses to this letter

these comments do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Place value: place quality and its impact on health, social, economic and environmental outcomes*, describes a general link between place quality and link to health, social, economic, and environment effects. The EIR includes detailed consideration and analysis of Project impacts to shade and shadow effects in Section 3.1, Aesthetics and Visual Resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further detail on impacts to these issues. Neither the comment nor the citations provide any clear detail that would suggest the EIR analysis is insufficient.

*Comment FL2-17*

The comment provides a variety of links related to nighttime lighting impacts. These articles are also identified in Comment MN106-10. The cited studies address a range of topics including nighttime or artificial lighting's relationship to bats, circadian rhythm, teen sleep and mood, light pollution, and attraction of disease-carrying pests. Neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of Project impacts with nighttime lighting and glare issues in Section 3.1, Aesthetics and Visual Resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding nighttime lighting. The comment provides no detail or explanation as to how or why the provided studies are directly applicable to the proposed Project.

*Comment FL2-18*

The comment provides a variety of links related to operational noise in urban environments. These articles are also identified in Comment MN106-11. However, none of the referenced studies or literature reviews conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* including the detailed quantitative noise modeling effort. For example, *Noise Levels Associated with Urban Land Use* describes that the aim of the study was to assess and compare noise levels in two urban neighborhoods: one completely residential and comprised of mostly single and multi-family dwellings, and the other characteristic of mixed residential and commercial land uses. The study focused on roadway noise, which was the primary source of ambient noise in both study areas. The discussion even acknowledges that certain limitations may affect the generalizability of the results. For example, noise levels were measured in only two neighborhoods and within a limited time period. Increasing the number of study areas to include additional land-use types would provide a deeper understanding of the relationship between environmental noise, the built environment, and human health risks. The quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise

of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant.

*Comment FL2-19*

The comment provides a variety of links related to increased crime rates and homelessness. These articles are also identified in Comment MN106-12. As described in the response to Comment MN 106-12, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, one of the articles simply provides a summary of crime rates among homeless populations of Los Angeles, one of which was specific to the year 2018. Another provides a guide on homeless encampments provided by Arizona State University. There is no clear connection between the materials cited and the proposed Project. None of the material provides any mention of Redondo Beach, Torrance, construction activities, redevelopment, operation of healthy living campuses or similar facilities.

*Comment FL2-20*

The comment provides citations to various studies and referential material related to fugitive dust, particulate matter, and adverse respiratory health effects. However, as described in the response to Comment FL2-13, the findings of these reviews do not conflict with or challenge any specific aspects of the analysis provided in Section 3.2, *Air Quality*. Impacts associated with temporary, but prolonged construction-related impacts are fully addressed under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction HRA.

*Comment FL2-21*

The comment provides citations to various studies and articles related to noise, sleep disturbance, traffic noise and health. *Environmental noise and sleep disturbances: a threat to health*, *A Multilevel Analysis of Perceived Noise Pollution, Auditory and non-auditory effects of noise on health, Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality* is identified in Comment FL2-18 and *Environmental Stressors: The Mental Health*

*Impacts of Living Near Industrial Activity* is identified in Comment FL2-21. Refer to these individual responses for further discussion. As described therein, none of the referenced studies or literature reviews conflict with or challenge any specific aspects of the analysis provided in the EIR, including the detailed quantitative air quality and noise modeling efforts.

*Comment FL2-22*

The comment provides a variety of links related to asbestos-containing material (ACM) and the potential for asbestos poisoning. These articles are also identified in Comment MN106-15. As described in the response to Comment MN 106-15, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Asbestos Exposure among Construction Workers During Demolition of Old Houses in Tehran, Iran* evaluates asbestos exposure specifically among construction workers in Tehran, Iran. The article *Can Buildings Be Demolished Safely Without Asbestos Abatement* explores the possibility that structures in Detroit, Michigan may be able to be safely demolished without the additional cost of asbestos abatement. The comment also cites the U.S. Environmental Protection Agency's (USEPA's) *Scope of Risk Evaluation for Asbestos and Guidelines for Enhanced Management of Asbestos in Water at Ordered Demolition* but makes no indication that the proposed activities or the required mitigation measures are insufficient with referenced standards. E*stimating the Additional Greenhouse Gas Emissions in Korea: Focused on Demolition of Asbestos Containing Materials in Building* describes greenhouse gas (GHG) emissions during removal of asbestos containing material due to operation of construction equipment and truck trips.

As described in Section 3.8, *Hazards and Hazardous Materials*, prior to demolition of existing structures with the potential to contain hazardous materials (i.e., ACM, lead-based paint [LBP], and polychlorinated biphenyl [PCB]), surveys would be conducted by a licensed contractor(s). If hazardous material is found, all applicable Federal, State, and local codes and regulations and best management practices related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds would be followed to ensure public safety, such as sealing off an area and filtering effected air. Adherence to these regulations and best management practices would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue.

*Comment FL2-24*

The comment provides a variety of links related to water runoff during construction. These articles are also identified in Comment MN106-16. As described in the response to Comment MN 106-16, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Storm water contamination and its effect on the quality of urban surface waters* describes stormwater drainage and surface water pollutants within the sewage system of a city in Poland. The aim of the analyses was to explain to what extent pollutants found in storm water runoff from the studied catchments affected the quality of surface waters and whether it threatened the aquatic organisms.

The comment also fails to acknowledge that the EIR includes a detailed analysis of stormwater runoff in Section 3.9, *Hydrology and Water Quality* and potential hazards and hazardous materials in Section 3.8, *Hazards and Hazardous Materials*. As described therein and summarized in Master Response 11 - Hazards and Hazardous Materials Analysis, the Phase I Environmental Site Assessment (ESA) identified potential sources of contamination. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of these ESAs, the EIR describes compliance with applicable regulations and standards, best management practices, and required mitigation measures to address these conditions and ensure Project impacts would be less than significant. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue.

*Comment FL2-25*

The comment provides two citations related to with negative health impacts associated with reduced privacy. These citations are also identified in Comment MN106-17. As described in the response to Comment MN 106-17, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, the comment provides citations for two articles with no clear connection to the proposed Project or the EIR analysis. *Designing for invisible injuries: An exploration of healing environments for posttraumatic stress* describes architecture and design strategies for creating empathetic spaces for veterans with post-traumatic stress disorder. *Trauma Informed Community Building* describes a Trauma Informed Community Building approach in community development.

*Comment FL2-26*

The comment provides citations to various studies related to health effects of traffic noise, nighttime noise, and general noise exposure, including cardiovascular responses in young adults.

These citations are also identified in Comment MN106-18. However, beyond discussing the issue of noise, the referenced studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. The comment fails to acknowledge that noise impacts are addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. The comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

*Comment FL2-27*

The comment provides citations to various studies and literature reviews related to stress management/avoidance strategies, traffic noise, traffic-related air pollution and stress. However, beyond discussing the issues of traffic, noise, and air quality neither the comment, nor any of these studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. See the response to Comment MN106-19 for a detailed discussion and response to comments pertaining to these studies.

### 9.3.6 Interested Members of the Public

**Letter AK1**

March 23, 2021
Abbes G Khani

*Comment AK1-1*

The comment expresses limited support for adoption of Alternative 4 and opposition to the proposed Project, which includes a proposed service entry/exit off of Flagler Lane, as well as Alternative 6, which includes a reduced footprint for the Residential Care for the Elderly Building (RCFE) Building, but a larger building footprint wrapping around the eastern boundary of the campus. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter AK2**

March 25, 2021
Abbes G Khani

*Comment AK2-1*

The comment correctly states that Alternative 4, described in Section 5.5.4, *Alternative 4 – Phase 1 Preliminary Site Development Plan Only*, has been identified as the environmentally superior alternative in the Environmental Impact Report (EIR). However, the comment questions why it is included and addressed an alternative rather than being addressed as the proposed Project.

As described in Section 2.0, *Project Description*, the proposed Project – including the proposed vehicle access along Flagler Lane – accommodates the preferred design, orientation of uses, and on-site circulation for the Residential Care for the Elderly Building (RCFE) Building. Therefore, this preliminary site development plan for Phase 1 has been identified as an element of the proposed Project. However, as described in Section 5, *Alternatives* during the development of the proposed Project, the City of Torrance and many residences within the Torrance neighborhood to the east of the Project site raised concerned regarding the proposed vehicle access along Flagler Lane. For example, as described in Section 3.10, *Land Use and Planning*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with Torrance Municipal Code (TMC) Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. The City of Torrance is also considering the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. Therefore, Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative each consider an alternative access and circulation scheme, which eliminates the vehicle access on Flagler Lane. As the decision makers, the BCHD Board of Directors has full discretion to adopt any of these alternatives following deliberations on the proposed Healthy Living Campus Master Plan. Their status as alternatives to the proposed Project do not limit their adoption in any way.

## Letter AK3

June 3, 2021
Abbes G Khani

*Comment AK3-1*

This comment expresses general opposition to the proposed Project, claiming that the decision makers involved in the development or adoption of the proposed Health Living Campus Master Plan have no statutory authority to negatively impact lives. For issues related to general opposition to the proposed Project, refer to Master Comment Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment AK3-2*

This comment states that the EIR deliberately fails to address the impact on the neighborhood's real estate valuation and that approval of the Project must address remedial/monitory compensation for adversely impacted neighborhoods. As described in Section 3.0, E*nvironmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potentially significant adverse physical effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

**Letter AA**

June 7, 2021
Alan Archer

*Comment AA-1*

This comment provides a summary of the details regarding the Project site location and surrounding development from Section 2.0, *Project Description*. This comment has been received and incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

*Comment AA-2*

The comment restates the project objectives as presented in Section 2.4, *Project Objectives*. This comment has been received and incorporated into the Final EIR as a part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

*Comment AA-3*

The comment restates the analysis of aesthetics and visual resources from Section 3.1, *Aesthetics and Visual Resources* and asserts that the statement in this discussion – that views from Sunnyglen park are completely blocked by intervening 1- to 2-story structures – is false. Refer to the response to Comment TRAO-22.

*Comment AA-4*

The comment provides a summary of the discussion of visual character and visual quality, along with the regional setting and existing visual conditions, that is presented in Section 3.1, *Aesthetics and Visual Resources* of the EIR. This comment has been received and incorporated into the Final EIR as a part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

*Comment AA-5*

The comment disagrees with the findings of visual and aesthetic impacts analysis as presented in Section 3.1, *Aesthetics and Visual Resources* and states that the impacts to scenic views presented under Impact VIS-1 distract from neighborhood compatibility issues. While the comment provides renderings of the proposed Project that were presented in the EIR, the comment does not challenge any specific aspects of the analysis of scenic vistas presented in Impact VIS-1 or visual character presented in Impact VIS-2. This comment also does not provide any substantiating evidence to support its assertion that the proposed RCFE Building does not belong on the Project site. For a detailed discussion and response to comments for issues pertaining to building height and neighborhood compatibility refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

**Letter AI1**

March 24, 2021
Alan Israel

*Comment AI1-1*

The comment expresses general opposition to the proposed Project due to its perceived large size and perceived incompatibility with development in surrounding neighborhoods. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Aesthetics and Visual Resources* or provide any substantiating evidence to support its assertions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For a detailed discussion and response to comments on issues pertaining to building height and neighborhood compatibility refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

*Comment AI1-2*

The comment expresses general opposition to the proposed Project due to the proposed length of construction activities, and effects construction would have on traffic and air quality. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Air Quality* or Section 3.14, *Transportation*. The comment also does not provide any substantiating evidence to support its assertions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to construction-related air quality impacts. Refer to Master Response 13 – Transportation Analysis

for a detailed discussion and response to comments pertaining to construction-related traffic impacts.

*Comment AI1-3*

The comment expresses general opposition to the proposed Project due to incompatibility of the size and scale of Project with surrounding residential uses, and claims that development under the proposed Project would block views and sunlight, and would change the personality of the area. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.1, *Aesthetics and Visual Resources* or Section 3.11, *Land Use and Planning*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments on issues pertaining to visual character as well as the detailed shade and shadow modeling provided in the Environmental Impact Report (EIR).

*Comment AI1-4*

The comment expresses general opposition to the proposed Project due to proposed cost of implementation. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to concerns regarding financial feasibility of the proposed Project.

*Comment AI1-5*

The comment expresses general opposition to the proposed Project due to the variety of assisted living facilities that already exist within the area, trends for providing assistance to the elderly within their own homes, and a lack of need for the Project. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need for the proposed Project.

*Comment AI1-6*

The comment expresses general opposition to the proposed Project due to the anticipated cost of the proposed Assisted Living units and Memory Care units. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

*Comment AI1-7*

The comment expresses general opposition to the proposed Project due to an alleged underlying intent of the proposed Project to generate revenue rather than provided service to the community. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project

Objectives for a detailed discussion and response to comments pertaining to the need for the proposed Project.

**Letter AI2**

June 9, 2021
Alan Israel

*Comment AI2-1*

The comment expresses general opposition to the proposed Project and asserts that it is not needed; it is too expensive; and it is too large. However, the comment does not challenge any specific aspects of the impact analysis and does not provide any substantiating evidence to support its assertions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For a detailed discussion and response to comments pertaining to the need for the proposed Project, refer to Master Response 3 – Project Need and Benefit. For a detailed discussion and response to comments pertaining to the financial feasibility of the proposed Project refer to Master Response 6 – Financial Feasibility/Assurance. For a detailed discussion and response to comments pertaining to building height and visual character, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

*Comment AI2-2*

The comment asserts that the proposed Project is an illegal use of public land and taxpayer funds. The use of public funding for capital improvement projects is commonplace and is clearly not illegal, particularly in this instance where revenue generated by a capital improvement project is used to provide community health and wellness programming and services in alignment with the mission of the Beach Cities Health District (BCHD). This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment AI2-3*

The comment expresses general opposition to the proposed Project due to perceived lack of benefit provided by the proposed Project. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the proposed benefits of the Project.

*Comment AI2-6*

The comment expresses general opposition to the proposed Project and asserts that it will destroy the residential nature of the surrounding neighborhood. However, the comment does not challenge any specific aspects of the impact analysis provided in the EIR and does not provide any substantiating evidence to support its assertions. For a detailed discussion and response to comments pertaining to building height and visual character, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

**Letter AR**

May 25, 2021
Allen Rubin

*Comment AR-1*

The comment expresses general concern regarding the City of Torrance's closure of the southbound travel movement along Flagler, which would cause some nearby residents to go around the medical facility to Del Amo Boulevard in order to get home from Vons. This issue is separate and distinct from the proposed Project, but has generally been addressed under cumulative impacts and has been considered during the development of Alternative 3 – Revised Access and Circulation.

The comment also asserts that Redbeam has become a source of cut-through traffic for those going to the City of Redondo Beach and suggests that traffic safety issues will be exacerbated as a result of the proposed Project. The Environmental Impact Report (EIR) identifies and thoroughly discusses potential issues related to cut-through traffic. This issue was evaluated as a part of the robust transportation study prepared for the proposed Project. The comment does not challenge any specific aspects of this analysis and does not provide any substantiating evidence to support its assertions that the vehicle access along Flagler Lane would substantially exacerbate cut-through traffic or present safety hazards. It is important to note that there would be no access to parking along Flagler Lane and that the proposed vehicle access would be limited to: 1) vehicles turning left onto Flagler Lane after dropping off passengers at the proposed Residential Care for the Elderly (RCFE) Building; and 2) service trucks entering and exiting the service area and loading dock. These types of vehicle access would not substantially contribute to cut-through traffic. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to operational traffic issues.

Finally, the comment claims that the proposed Project would have a substantial impact on property values within the vicinity. As described in Section 3.0, E*nvironmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

**Letter AY**

June 9, 2021
Amy Yick

*Comment AY-1*

This comment expresses opposition to the proposed Project and asserts that construction-related activities would result in poorer air quality, adversely affecting the health and wellbeing of residents and children attending schools located in the vicinity of the Project site. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and responses to comments pertaining to construction-related air quality impacts, including potential impacts to nearby sensitive receptors.

It should be noted that the analysis of criteria air pollutant emissions in the Environmental Impact Report (EIR) is supported by detailed modeling results that rely on the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod) Additionally, the analysis of Toxic Air Contaminants (TACs) is supported by detailed modeling results that rely on the U.S. Environmental Protection Agency's (USEPA's) AERMOD and the California Air Resources Board's (CARB's) Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool. The comment does not challenge the methodology, assumptions, or results of these extensive modeling efforts, which informed the air quality impact analysis in the EIR and show that with the implementation of all required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts to sensitive receptors would be

less than significant when compared to the SCAQMD thresholds for criteria pollutant emissions and the CARB thresholds for TACs.

*Comment AY-2*

The comment expresses concern regarding the construction-related noise impacts on school children and residents located in the vicinity of the Project site. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to construction-related noise impacts on nearby sensitive receptors. It should be noted that the EIR discloses and discusses a significant and unavoidable impact on sensitive receptors, including those residences located adjacent to the Beach Cities Health District (BCHD) campus along Flagler Lane and Flagler Alley. However, construction-related noise at Towers Elementary School would be less than the Federal Transit Administration (FTA) thresholds identified in the EIR. Therefore, the construction-impact of noise on the indoor learning environment would be less than significant. The comment does not challenge any specific aspects of the quantitative impact analysis in Section 3.11, *Noise* or provide any substantiating evidence to support its assertions. (As described in the response to Comment KB-4, it should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the campus by a recreational field and is located approximately 735 feet from the proposed construction activities.)

**Letter ABC1**

June 8, 2021
Anita & Bob Caplan
Users of the BCHD Services
402 S Lucia Avenue
Redondo Beach, CA 90277

*Comment ABC1-1*

The comment states that the commenter finds the EIR to be technically sufficient with regard to impact analysis and mitigation analysis. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter ABC2-1

June 8, 2021
Anita & Bob Caplan
Users of the BCHD Services
402 S Lucia Avenue
Redondo Beach, CA 90277

*Comment ABC2-1*

The comment states that commenter believes the proposed Project to be an excellent fit for their needs for health promotion and maintenance. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter AMG

June 8, 2021
Ann & Marty Gallagher
19404 Linda Drive
Torrance, CA 900503

*Comment AMG-1*

The comment expresses general opposition to the proposed Project citing the perceived size of proposed development as well as assertions that there would impacts related to shade/shadows, hazard, noise, and traffic. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.1, *Aesthetics and Visual Resources*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise*, or Section 3.14, *Transportation*. Additionally, the comment does not provide any substantiating evidence to support its assertions related to any of these issues.

The comment incorrectly states that the proposed Project would result in a loss of open space. In fact, as clearly described in Section 2.0, *Project Description* and shown in Table 1-2, open space would be increased from 0.3 acres on the existing Beach Cities Health District (BCHD) campus to 2.45 acres under the proposed Healthy Living Campus Master Plan.

The comment asserts that implementation of the proposed Project would result in illegal zoning. Refer to Master Response 7 – Project Compatibility with P-CF Zoning and Land-Use Designation for a detailed discussion and response to comments pertaining to this issue. For decades, BCHD has provided and facilitated a variety of free and low-cost programs and services to residents within

the Beach Cities and nearby South Bay communities on the Project site. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue to reinvest revenue in community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain consistent and compatible with land use designation.

*Comment AMG-2*

The comments states that the proposed Assisted Living units are not geared to benefit local residents of the Beach Cities, and are instead expected to appeal to wealthier people presently living elsewhere. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to these concerns. It should be noted that BCHD retained the MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach. The analysis identifies that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the campus, referred to in the study as the Primary Market Area.

*Comment AMG-3*

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter AC1**

April 13, 2021
Ann Cheung

*Comment AC1-1*

The comment expresses general opposition to the proposed Project and asserts that the Environmental Impact Report (EIR) dismisses most of the public comments/issues raised as either less than significant or less than significant with mitigation. Not only is this assertion incorrect, but the comment does also not identify or challenge any specific aspects of the thresholds, methodologies, or impact analyses provided in the EIR. For issues related to general opposition to

the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment also claims that the proposed Project grew in size. However, as described in Table 1-2, the 2019 Master Plan originally included 592,700 square feet (sf) of total occupied building area and the 2020 Master Plan now includes 484,900 sf of total building area, representing an approximately 18 percent decrease. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, it should also be noted that the height of the proposed Residential Care for the Elderly (RCFE) Building was adjusted from a maximum of 4 stories to a maximum of 7 stories in order to avoid locating large portions of the building along the eastern boundary of the Beach Cities Health District (BCHD) campus. This revision represents an effort to: 1) concentrate the majority of the building mass along Beryl Street, with a stepdown in building height provided by the Redondo Village Shopping Center; and 2) address construction-related concerns associated with the adjacency of the proposed RCFE Building to the residential neighborhood within the City of Torrance to the east.

*Comment AC1-2*

The comment expresses concern regarding impacts of construction noise and noise generated by outdoor activities during operation of the proposed Project. The comment correctly identifies that construction-related activities would result in significant and unavoidable for sensitive receptors located on-site and immediately adjacent to the campus. The EIR discloses this impact in Section 3.11, *Noise* under Impact NOI-1 and reduces this impact to the maximum extent practicable with the required implementation of Mitigation Measure (MM) NOI-1. Nevertheless, this impact would remain significant and unavoidable due to the inability of the noise barriers to reduce construction-related noise to levels that would be below the Federal Transit Administration's (FTA's) thresholds identified in the EIR.

The comment asserts that post-construction activities would last late into the evenings. However, as described in Section 3.11, *Noise* under Impact NOI-3, operational noise activities – including outdoor function areas – would be less than significant with the implementation of MM NOI-3b, requiring the preparation and implementation of an events management plan, and MM NOI-3 limiting the hours for outdoor pool activities. These mitigation measures would ensure consistency with the noise ordinance requirements in the Redondo Beach Municipal Code (RBMC).

The comment does not challenge any specific aspects of the impact analysis in Section 3.11, *Noise* and does not provide any substantiating evidence to support its assertions related to noise impacts. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction and operational noise impacts.

*Comment AC1-3*

The comment expresses concern regarding congestion on surrounding streets and expresses opposition to proposed vehicle access along Flagler Lane. Refer to Master Response 13 – Transportation Analysis for detailed discussion of operational transportation impacts, including potential safety impacts. It should be noted that the exhaustive trip generation analysis determined that trip generation would be reduced following the implementation of Phase 1, but would increase slightly by 376 new daily trips as compared with existing conditions during Phase 2. Nevertheless, the impacts associated with operational traffic would remain less than significant as compared to the applicable thresholds (refer to Section 3.14, *Transportation*). It should also be noted that a Transportation Demand Management (TDM) plan is required by RBMC Section 10-2.2406, which requires a TDM plan for all nonresidential developments of 25,000 square feet (sf) or more. The TDM plan would also encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being.

The comment does not challenge any specific aspects of the analysis presented in Section 3.14, *Transportation*. Additionally, this comment does not provide any substantiating evidence to support its assertions.

The comment regarding opposition to vehicle access along Flagler Lane has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment AC1-4*

The comment restates the commenters general opposition to the proposed Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter AC2

June 6, 2021
Ann Cheung

*Comment AC2-1*

The comment restates the commenters opposition to the proposed Project. Refer to Master Comment Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment AC2-2*

The comment questions the need for the proposed Project, particularly with regard to the proposed Residential Care for the Elderly (RCFE) Building and Program of All-Inclusive Care for the Elderly (PACE) components of the proposed Project. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need for these components of the proposed Project. It should be noted that the Beach Cities Health District (BCHD) retained the MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. There are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located in any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services.

*Comment AC2-3*

The comment asserts that the Phase 2 development program is an incomplete plan. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic nature of Phase 2 of the proposed Project. As discussed in Section 1.1, *Overview,* the Environmental Impact Report (EIR) evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1 analyzed at a project-level of detail, and a development program for Phased 2 analyzed at a programmatic-level of detail. As a result, the

Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan. This approach is often common for lead agencies when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans available for later improvements. If, through the future development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, additional analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]).

*Comment AC2-4*

The comment expresses concern regarding impacts of construction and operational traffic on surrounding streets and states that the EIR provides no comprehensive detailed analysis of the RCFE and PACE daily commuters. Refer to Master Response 13 – Transportation Analysis for detailed discussion of transportation impacts associated with the proposed Project.

Despite the assertions in the comment, the EIR clearly does include comprehensive analysis of impacts to transportation that could occur as a result of the proposed Project. In fact, the EIR includes an exhaustive trip generation analysis that specifically identifies trip generation rates for the Assisted Living program and PACE components of the proposed Project, including residents, patients, visitors and staff. It should be noted that the trip generation analysis determined that trip generation would be reduced following the implementation of Phase 1, but would increase slightly by 376 new daily trips as compared with existing conditions during Phase 2. Nevertheless, the impacts associated with operational traffic would remain less than significant as compared to the applicable thresholds. These thresholds are for impacts measured by vehicle miles travel (VMT), which has replaced roadway capacity-based or automobile delay-based level of service (LOS) as the metric for transportation impact analysis pursuant to Senate Bill (SB) 743 and the California Environmental Quality Act (CEQA) Guidelines (refer to Section 3.14, *Transportation*).

The trip generation rates for these uses, as well as the trip generation rates for the other uses included in Phase 1 and Phase 2 of the proposed Project, have been developed based on existing trip counts on the campus, trip counts for similar facility types, Institute of Transportation Engineers (ITE) trip generation rates, programming information provided by BCHD, and market feasibility studies. The trip generation and VMT estimates presented in the EIR in Section 3.14.3, *Impact Assessment and Methodology,* were prepared by Fehr & Peers, a well renowned professional transportation planning firm, using applicable and accepted technical methodologies.

The comment does not challenge any specific aspects of this trip generation analysis or provide any substantiating evidence to further support its assertions.

With respect to construction-related impacts, the comment asserts that the analysis in Section 3.14, *Transportation* acknowledges that increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may temporarily disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of mitigation measure Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would identify designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. The Construction Traffic and Access Management Plan would address temporary traffic impacts that could occur during each construction activity. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation.

*Comment AC2-5*

The comment expresses concern regarding construction noise and air quality impacts and the effects construction would have on sensitive receptors. These issues are thoroughly addressed in the EIR (refer to Section 3.1, *Aesthetics and Visual Resources* and Section 3.11, *Noise*). Construction-related noise is identified as a significant and unavoidable impact in the discussion of Impact NOI-1. The comment does not challenge any of these analyses or provide any substantiating evidence to support or clarify the issues that have been raised. Refer to Master Response 10 – Air Quality Analysis and Master Response 12 – Noise Analysis for a detailed discussion and a response to comments pertaining to these issues.

## Letter AW

June 9, 2021
Ann Wolfson

*Comment AW-1*

This comment expresses opposition to the proposed Project, and without substantiating evidence or expert opinion, states that the EIR is deficient because it minimizes impacts, makes assumptions, and omits data and analysis in key impact areas including aesthetics, land use, transportation, hazards and hazardous materials, noise, air quality, biological resources, and recreation. However, the comment does not challenge any of these analyses or provide any substantiating evidence to support or clarify the issues that have been raised.

*Comment AW-2*

The comment states that the description of the Phase 2 development program is vague, lacks proper visualizations, and results in an unstable program. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion and response to comments regarding the programmatic description and analysis of Phase 2 development program.

The comment further states, again without substantiating evidence and expert opinion, that the Environmental Impact Report (EIR) lacks substantive analysis of impacts to health and well-being of residents due to impacts related to the above stated impact areas. However, as described in the response to Comment AW-1, the comment does not challenge any of these analyses or provide any substantiating evidence to support or clarify the issues that have been raised. The EIR was prepared pursuant to the California Environmental Quality Act (CEQA) Guidelines and includes thorough, detailed analysis of impacts on all pertinent environmental issue areas, including impacts on air quality, noise, land use compatibility, and hazards and hazardous materials, which takes into consideration the potential effects on human health. Various comments – including Letter FL2 – have provided links to studies, literature reviews, and other articles related to chronic stress. However, the vast majority of these studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. None of the referenced studies or articles conflict with the EIR's analysis or otherwise provide substantial evidence or expert opinion to suggest an element of the proposed Project would result in a significant environmental impact that was not fully analyzed and disclosed in the EIR.

*Comment AW-3*

The comment states that the project objectives described in the EIR provide restrictive assumptions, and that the project objectives are not public-focused or based on community needs. Refer to Master Response 4 – Project Objectives for detailed discussion and response to comments regarding the adequacy of the project objectives.

*Comment AW-4*

The comment states that the alternatives to the proposed Project are flawed because they do not include consideration of an alternative involving retrofit of the existing building. However, the EIR does include consideration and analysis of such an alternative. As described in Section 5.0, *Alternatives*, under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

*Comment AW-5*

The comment states the EIR should address the cumulative impact of the purported deficiencies described in Comment AW1 through AW4. However, as described in the response to Comment AW1, these comments do not challenge any specific aspects of the EIR. Additional discussion and responses to individual supplemental comments are provided in the responses to Comment AW-6 through AW-43.

*Comment AW-6*

The comment states that the proposed Project – including the Residential Care for the Elderly Building (RCFE) – is incompatible with surrounding neighborhoods due to the size and height of proposed development. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to building height and visual character. Aside from the subjective contention that the proposed RCFE Building would be incompatible, the comment does not contest the consistency of the proposed Project with the City of

Redondo Beach policies and development standards, which, consistent with CEQA requirements, are the thresholds for the analysis of impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*). Although the height and mass of the proposed RCFE Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

*Comment AW-7*

The comment states that the placement, scale, and mass of the proposed RCFE Building would cause significant damage to surrounding neighborhoods and violates several policies of the City of Redondo Beach and the City of Torrance General Plans pertaining to visual character and compatibility of new development. The comment further states that the proposed RCFE Building would cause significant damage to blue sky views, loss of privacy for surrounding residents, generate new light and glare, create shadows affecting surrounding development, and obstruct sightlines. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to building height and visual character. Please also refer to Table 3.1-2 in Section 3.1, *Aesthetics and Visual Resources* for detailed discussion as to the Project's potential to conflict with applicable policies of the City of Redondo Beach and the City of Torrance General Plans governing visual character and compatibility of new development. Specific issues related to Redondo Beach General Plan Policy 1.46.4 as well as Torrance General Plan Policy LU.2.1 and LU.3.1 are also addressed in the response to Comment TRAO-19.

The claim that the EIR lacks substantive analysis of potential impacts to aesthetics and visual resources is unfounded, particularly given the preparation of detailed computer-based photosimulations as well as shade and shadow analyses prepared by two licensed architects. Impacts to blue sky views, privacy, light and glare, and shade and shadows are discussed at length in the EIR. The comment does not challenge any specific thresholds, methodologies, or impacts identified in Section 3.1, *Aesthetics and Visual Resources*.

*Comment AW-8*

The comment asserts that the representative views selected for the analysis of aesthetics and visual resources are flawed because they demonstrate views from innocuous sites and were selected to justify proposed mitigation requiring a reducing in the height of the structure. As described in the response to Comment TRAO-17, the comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2. The impact to scenic views, which is the subject of the

comment, would result from the height of the proposed RCFE Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane. Mitigation Measure (MM) VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. These six representative views, which were identified with input from the City of Redondo Beach, encircle the BCHD campus and provide west, southwest, south, and northeast facing views of the Project site (refer to Figure 3.1-1). Representative Views 2, 3, and 5 in particular provide views of the Project site from a distance of less than 100 feet that are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter's assertion that these views used in the analysis of visual impacts are innocuous locations or that the height of proposed development is underrepresented. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Comment AW-9*

The comment states that the City of Torrance was not consulted on the selection of representative views, and that new views from the City of Torrance must be provided with City input. To fully and accurately assess potential impacts associated with aesthetics and visual resources, a total of six representative views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. Two of these representative views – Representative Views 1 and 2 – are located within the residential neighborhood located directly to the east of the Project site, within the City of Torrance, while Representative View 3 is located at the corner of Dominguez Park directly adjacent to City of Torrance boundary. Many views elsewhere within the City of Torrance are often further away and views of the Project site are largely obstructed by existing development, trees, and power lines. These representative views were selected as they provide some of the greatest and most direct views of the Project site within the City of Torrance and are generally representative of similar views from other areas within the City of Torrance. CEQA Guidelines Section 15151 states that *"[a]n evaluation of environmental effects of a proposed project need not be exhaustive…"* This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such

views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide *"a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations"* (CEQA Guidelines Section 15151). Further, the analysis employed in this EIR for aesthetic and visual resources is informed by and consistent with the methodologies employed by other recent analyses prepared by the City of Redondo Beach and City of Torrance. In these other recent EIRs, which include the Solana Residential Development Project EIR and the Kensington Assisted Living Project EIR, the lead agencies characterize and depict views from only a handful of representative locations. For instance, the Solana Residential Development Project EIR prepared by the City of Torrance considered only seven key views from sites located directly adjacent to the proposed development site and included four visual simulations for views from nearby residences looking out across the site. Therefore, the representative views identified and utilized in the analysis of this EIR are considered adequate to inform the analysis of impacts to aesthetics and visual resources consistent with the CEQA Guidelines, and inclusion or consideration of additional representative views is not necessary.

*Comment AW-10*

The comment states that realistic photosimulations of the Phase 2 development program are missing, and must be included in order to adequately analyze impacts of the Project, including impacts from shade and shadows. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments regarding the level of detailed included in the analysis of the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the proposed Phase 1 site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which are used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights.

*Comment AW-11*

The comment summarizes earlier statements about the sufficiency of the impact analysis and the findings of impacts on aesthetics and visual resources, particularly impacts on surrounding

development and consistency with applicable policies of the City of Redondo Beach and City of Torrance General Plans. Please refer to responses to Comments AW-6 through AW-7 for detailed discussion and response to comments pertaining to these issues.

The comment notes that the residences to the east within the City of Torrance are subject to R-H Hillside and Local Coastal Overlay Zone, Section 37.41.1 Hillside and Coastal Zone. As described the individual response to Comment Letter RR3, it should be noted that the applicability of the Torrance General Plan – including the Torrance Hillside Overlay Zone – are discussed in the responses to Comment RR3-5 through RR3-7. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issues by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

*Comment AW-12*

The comment summarizes earlier statements about the Project's impact on open sky views and distant views of the Palos Verdes hills. Please refer to the response to Comment AW-8 for detailed discussion and response to comments pertaining to this issue.

*Comment AW-13*

The comment summarizes earlier statements about deficiencies in the EIR analysis with regard to details concerning the Phase 2 development program and lack of visual aids provided for this phase of the Project. Please refer to response to Comment AW-10 for detailed response to these concerns.

*Comment AW-14*

The comment requests the EIR provide photosimulations and other physical aids such as silhouettes, poles, and flag banners showing the height and mass of structures for Phase 1 and Phase 2. However, provision of additional simulations and other physical aids depicting the height and mass of structures for Phase 1 and Phase 2 are not necessary to inform the analysis of impacts on aesthetics and visual resources. As previously described, the EIR analysis of impacts to aesthetics and visual resources is informed by detailed photosimulations prepared by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, for the Phase 1 preliminary site development plan. Photosimulations are often employed in the analysis of visual impacts in place of silhouettes, poles, or flag banners as they can provide an equally or more informative analysis than when utilizing silhouettes, poles, of flag banners. Similarly, as described in the response to Comment AW10, the

analysis of the Phase 2 development program provides descriptions for three representative example site plan scenarios, which are used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects.

The comment requests that new key viewing locations selected in consultation with the City of Torrance be provided and, at a minimum, include views from: 1) Diamond Street & North Prospect Avenue Intersection, 2) Prospect Street & 190th Street Intersection, 3) Towers Elementary School, and 4) Diamond Street. However, for the following reasons, representative views from each of these locations were not selected to inform the analysis of aesthetics and visual resources in this EIR.

1. Diamond Street & North Prospect Avenue: Views from this location are already represented by Representative View 5, located approximately 240 feet to the northwest. Views from this location are also already qualitatively analyzed for the Phase 2 development program based upon representative views provided by Paul Murdoch Architects.

2. Prospect Avenue & 190th Street (Anita Street) Intersection: Views of the Project site from this location are distant and largely obstructed by traffic lights, street trees, and power lines. Representative View 4 was selected as it provides a much more direct view of the Project site from a similar view direction and better informs potential Project impacts on open sky views.

3. Towers Elementary School: Views of the Project site from this location are largely already represented by Representative View 3, located approximately 400 feet to the west and closer to the Project site. Representative View 3 (Dominguez Park) was selected as it provides a much more direct view of the Project site from a similar view direction.

4. Diamond Street: Views of the Project site from this location are largely already represented by Representative View 5, located immediately adjacent to the campus. Views from Diamond Street are partially obstructed by existing residential development, trees, and power lines.

Refer to the response to Comment AW-9 for a detailed discussion and response to comments pertaining to request for additional representative views and consultation with the City of Torrance.

*Comment AW-15*

The comment recommends that substantial setbacks to proposed development towards the center of the Project site, combined with major reductions in height, would help to mitigated aesthetic and visual resource impacts. However, the comment fails to acknowledge the constraints associated with the proposed site plan. The continued operation of the Beach Cities Health Center is necessary to ensure revenue for programs and services provided by BCHD as well as funding for the completion of the development under Phase 1. As described in Master Response 9 – Aesthetics and Visual Resources Analysis, BCHD has revised the footprint of the RCFE Building to further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in height to the single- and multi-family residential development along Beryl Street.

*Comment AW-16*

The comment states, without substantiating evidence or expert opinion, that the EIR does not present detailed health impacts with regard to loss of sunlight, lack of privacy, glare, and nighttime lighting. However, the EIR includes detailed consideration and analysis of Project impacts with regard to each of these issues in Section 3.1, *Aesthetics and Visual Resources*, including detailed shade and shadowing modeling. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding potential impacts associated with aesthetics and visual resources.

*Comment AW-17*

The comment states that the shade study must show hours ranges, and that the EIR does not address on-site after school activities such as Young Men's Christian Association (YMCA) daycare and athletic uses for American Youth Soccer Organization (AYSO) soccer practices that the comment

claims would be negatively impacted by lack of sunlight. Master Response – Aesthetics and Visual Resources Analysis provides a detailed discussion and response to comments on the potential shade and shadow impacts associated with the proposed Project. As described therein, during the Fall and Winter, the proposed RCFE Building would also cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). However, as described under Impact VIS-4, none of the shade and shadows impacts would exceed the thresholds established in the EIR, which describe that a significant shade and shadow impact would occur *"if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October)."*

*Comment AW-18*

The comment states, without substantiating evidence or expert opinion, that the aesthetics and visual resources impact conclusions should be identified as significant. Please refer to the individual responses to Comment AW-6 though AW-17 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding potential impacts associated with aesthetics and visual resources.

*Comment AW-19*

The comment states that the EIR should be rejected and recirculated. However, no specific deficiencies in the analysis have been identified that would require recirculation of the EIR for additional public comment pursuant to CEQA Guidelines Section 15088.5.

*Comment AW-20*

The comment correctly summarizes that volatile organic compounds and perchloroethylene (PCE) was detected on the Project site. Additional discussion on hazards and hazardous materials associated with the proposed Project is provided at Master Response 11 – Hazards and Hazardous Materials Analysis.

*Comment AW-21*

The comment states that the selection of boring sites is inadequate. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to concerns regarding the adequacy of the borings completed as part of the Phase II Environmental Site Assessment (ESA). This issue is also addressed in the response to Comment TRAO-120, which

describes that no further soil boring sampling is necessary because the presence of contaminants has already been identified in the Phase II ESA.

*Comment AW-22*

The comment states that even with the best mitigation plans, there is a risk of accidental release of asbestos, lead, nuclear waste, polychlorinated biphenyls (PCBs), mold, and other materials that would be hazardous to human health through demolition of the existing development. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to concerns regarding construction-related impacts from hazards and hazardous materials, including the effectiveness of proposed mitigation in eliminating or reducing associated impacts.

With regard to nuclear waste, there is no evidence to suggest that nuclear waste would be disturbed during construction. All hazardous materials used operationally on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. The proposed Project would be subject to all of the requirements set forth in Chapter 4 (Small Quantity Generator Requirements) of the H&SC Medical Waste Management Act. Adherence to medical waste regulations for small quantity generators would ensure that impacts related to the storage, transport, and disposal of medical waste would be less than significant.

*Comment AW-23*

The comment states that additional, deeper borings and analysis should be done on the construction site due to the fact that PCE was found in 29 of 30 samples and that contamination is likely spready deeper and downhill the slope. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to issues regarding construction-related impacts from hazards and hazardous materials.

*Comment AW-24*

The comment states that additional study of the impact of natural occurrences such as heavy rains and winds on the potential to introduce hazardous substances into the air or stormwater systems should be conducted. However, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from

the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Therefore, with the implementation of the mitigation measures identified in the EIR (i.e., MM HAZ-2a through -2d) impacts associated with PCE would be less than significant. Implementation of these measures would ensure appropriate handling of soils on-site.

*Comment AW-25*

The comment states that additional study and reporting on the ramifications of human error or noncompliance with the appropriate guidelines should be provided. The EIR thoroughly describes the impacts associated with the potential exposure of contaminated soils to the environment as well as applicable mitigation necessary to reduce impacts. CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 requires that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

*Comment AW-26*

The comment states that additional information is needed on watering down of construction debris, contaminated soils, etc. However, MM HAZ-2a provides adequate details and discussion regarding mandatory watering of construction debris and contaminated soils. As discussed therein, during all working hours, stockpiled materials must be kept moist, and VOC-contaminated non-hazardous wastes must be immediately sprayed with water or suppressant and placed in a sealed container or directly loaded into a suitable transportation truck, moistened with water, and covered with a tarp of off-site transportation. Watering of VOC-contaminated non-hazardous waste is

subject to compliance with the specific requirements outlined in SCAQMD Rule 116 Mitigation Plan, which further specifies that VOC-contaminated soil stockpiles and sprayed with water and/or approved vapor suppressants and covered with plastic sheeting for all periods of inactivity lasting more than one hour and that for VOC concentrations in soils exceeding 1,000 parts per million (ppm), watering occur as soon as possible, but not more than 15 minutes after excavation of the soils. In addition, pursuant to MM HAZ-2a, general construction best management practices must be implemented to contain and control storm water runoff that might convey contaminated or excessive sediments.

Regarding process for management of contaminated soils in the event of a landslide, the EIR and mitigation measures are not required to analyze such unanticipated and unlikely events. As described in Section 3.6, *Geology and Soil*, according to the California Geological Survey (CGS) Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone. Similarly, according to the Redondo Beach Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides. Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very low.

*Comment AW-27*

The comment requests that additional analysis for the stormwater drain system as it pertains to its impact on water conservation/nature preserves to the lower elevation in the east, such as Entradero Park in Torrance, be provided. However, as described in Section 3.9, *Hydrology and Water Quality* under Impact HYD-1*,* the proposed land cover and impervious surface types would be relatively similar to those currently on the Project site, but would result in an overall net reduction in impervious surface areas. Further, as discussed in Section 3.10, *Land Use and Planning,* the proposed Project would not conflict with any of the applicable plans, policies, or measures of the City of Redondo Beach and City of Torrance General Plans or the RBMC and TMC related to water conservation and stormwater management. Ultimately, the proposed Project would not substantially affect operation or maintenance of downstream stormwater projects, including the stormwater basin located at Entradero Park, as the Project's estimated 20 percent reduction in permeable surfaces and associated reduction in stormwater runoff. As such, the proposed Project would not be anticipated to result in impacts on water conservation/nature preserves sustained through the City's stormwater system.

*Comment AW-28*

The comment states that air quality mitigation plans are not sufficiently discussed, nor are safeguards described. The comment further states that the mitigation plan does not provide sufficient detail for airborne contaminants and fugitive dust during periods of high wind, or the localized impact this would cause on nearby sensitive receptors. However, wind is considered as a part of the impact analysis and mitigation measures. For example, as described under Impact AQ-2, BCHD would be required to comply with SCAQMD Rule 403, which requires management of fugitive dust during construction activities. SCAQMD Rule 403, has specific provisions related to high wind conditions. Additionally, there is a specific provision in MM AQ-1 to *"prohibit demolition when wind speed is greater than 25 mph."* Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments regarding construction-related air quality impacts and mitigation measures.

*Comment AW-29*

The comment provides a summary of the noise analysis presented in Section 3.11, *Noise,* and generally states, without substantial evidence or expert opinion, that this analysis is not sufficient. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding construction and operation noise impacts. It should be noted that specific noise levels experienced by the nearest sensitive receptors are described in Table 3.11-16 and Table 3.11-17. Some assertions made by this comment (e.g., Towers Elementary School students, staff, and visitors would experience hazardous noise) is not supported by the results of the exhaustive quantitative noise modeling effort.

*Comment AW-30*

The comment states that the analysis of noise is deficient due to the analysis being based on modeled average noise, rather than intermittent noise, and requests additional details regarding the health impacts on nearby sensitive receptors. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to comments pertaining to construction and operational noise impacts. This response to comments provides a detailed explanation of the Federal Transit Authority (FTA) thresholds as well as the noise metrics that were used in the impact analysis.

*Comment AW-31*

The comment states that viable mitigation to noise, such as setbacks for structures and reductions in structure heights, was not considered in the EIR. However, as described in the response to Comment AW-15, the comment fails to acknowledge the site planning constraints associated with

the existing Beach Cities Health Center. Additionally, the requested reduction in height to 30 feet would not provide sufficient space within the RCFE Building or the other structures proposed under the Phase 2 development program to meet the project objectives. Refer to Master Response 12 – Noise Analysis for additional detailed discussion and response to comments pertaining to construction related noise issues and mitigation measures.

The comment states that Alternative 6 is not a replacement for substantial setbacks. This comment has been noted; however, as described in Section 5.5.6, *Alternative 6 – Reduced Height Alternative*, this alternative is intended to reduce the potentially significant impact to scenic vistas if a reduction in building height in accordance with MM VIS-1 cannot be accommodated. This alternative does not describe a reduction in construction noise below the FTA thresholds. This analysis simply notes that *"the height of the RCFE Building under Alternative 6 would be reduced as compared to the proposed Project, as such the total duration of construction above the noise barrier would also be reduced."*

*Comment AW-32*

The comment states that any significant and unavoidable impact affecting surrounding sensitive receptors is cause for the BCHD Board and approving City agencies to reject the proposed Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment AW-33*

The comment states that the EIR omits analysis of impacts on recreation and recreational amenities, particularly impacts on recreation at Towers Elementary and Dominguez Park. However, the EIR does include consideration of impacts to recreation and recreational amenities in Section 4.0, *Other CEQA Considerations*. Pursuant to Appendix G of the CEQA Guidelines, impacts of a proposed project on recreational resources are characterized as:

a) A resulting increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and

b) The development of recreational facilities or the construction or expansion of recreational facilities which would result in adverse physical effects on the environment.

As described in Section 4.5, *Effects Found Not to Be Significant,* the proposed Project does not involve the development of recreational facilities and would not substantially increase demand on

existing recreational facilities. As a result, the proposed Project would not cause a significant impact on recreation or recreational amenities and additional analysis of the topic is not required. Potential impacts on Towers Elementary and Dominquez Park are discussed in relevant sections of the EIR, including Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality,* and Section 3.14, *Transportation,* respectively.

*Comment AW-34*

The comment questions the EIR's findings regarding impacts on loss of mature trees and associated impacts on migratory birds, asserting that these impacts should be considered significant. However, as thoroughly discussed in Section 3.3, *Biological Resources,* while the proposed Project would result in the removal of approximately 20 landscaped trees along Flagler Lane, approximately 60 trees along the northern perimeter of the campus, and approximately 20 landscaped trees along Diamond Street. The Phase 2 development program would also require the removal of additional landscaped trees and shrubs within the interior portions of the existing campus. Despite the removal of these trees, the landscaping associated with the proposed would replace trees and shrubs with new vegetation that meets the landscaping regulations provided in RBMC Section 10-2.1900. Additionally, the proposed tree removal and landscaping along Flagler Lane would be conducted consistent with the Torrance Street Tree Master Plan. The proposed landscaping – including large landscaped trees and shade trees that are adapted to the climate of Southern California – would provide enhanced roosting or nesting habitat for resident and migratory birds. In addition, the implementation of MM BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged (i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation.

*Comment AW-35*

The comment states that the Nesting Bird Report and Biological Evaluation prepared for the proposed Project is deficient in terms of both time and manpower, asserting that the duration of the field survey was insufficient to adequately document all biological resources present at the

Project site. The Nesting Bird Report and Biological Evaluation was prepared by a qualified biologist with over 40 years of experience using approved survey methodologies. Further, it should be noted that the assessment of impacts on biological resources is not solely limited to those resources, particularly wildlife, in which a visual observation or occupation of the resource has been provided. The analysis of biological resources in Section 3.3, *Biological Resources* is also based on a review of the California Natural Diversity Database (CNDDB) and the assessment of habitat on-site, even if a particular species was not observed. For example, based on these additional resources, Cooper's hawk (*Accipiter cooperii*) was also identified as having a high potential to occur on the Project site and is considered in the analysis of potential impacts associated with the proposed Project. It should also be noted, as described in the response to Comment AW-34, that the implementation of MM BIO-1 would require an additional nesting bird survey(s) if construction activities occur during the nesting season. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation.

*Comment AW-36*

The comment questions the credibility of the Nesting Bird Report and Biological Evaluation, noting a personal observation that there are a greater abundance of hummingbirds within the Project site than observed during the survey. Refer to the response to Comment AW-35 for detailed discussion and response to comments pertaining to special status species and nesting birds.

*Comment AW-37*

The comment notes that Cooper's hawk is included on the California Department of Fish and Wildlife (CDFW) Watch List and is commonly sighted in the area. Refer to the response to Comment AW-35 for detailed discussion and response to comments pertaining to special status species and nesting birds.

*Comment AW-38*

The comment states again that the Nesting Bird Report and Biological Evaluation is deficient, and requests that a larger study be conducted to thoroughly check all vegetation and trees with the single purpose of finding nests. Refer to the response to Comment AW-35 for detailed discussion and response to comments pertaining to special status species and nesting birds.

*Comment AW-39*

The comment states that creating an appropriate setback of structures and construction away from the edge of the property would help to saved fully mature old trees from removal. Refer to the response to Comment AW-34 above for detailed discussion and response to comments pertaining to the loss of trees.

*Comment AW-40*

The comment states that visual simulations and renderings of the proposed Project are deceiving, and requests that realistic sketches showing how the landscaping would look at the time of Project operation be provided. The foliage represented in the photosimulations, like the buildings also represented in these photosimulations, do not currently exist because the purpose of these photo simulations is to provide a visual aid for what future development would look like after construction is complete. As described in Section 3.3, *Biological Resources* and in response to Comment AW-34 above, future development at the Project site would include landscaping plans that would replace vegetation removed during construction with new vegetation that meets the landscaping regulations provided in RBMC Section 10-2.1900. Additionally, the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent with the Torrance Street Tree Master Plan. As such, because new trees and landscaping would be included in the final development, it is more accurate for visual aids to include landscaping than to omit foliage entirely.

*Comment AW-41*

The comment states that the description of the Phase 2 development program is vague and inconsistent, omits critical information, and lacks visualizations and drawings, making the proposed Project impossible to understand. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of Analysis for detailed discussion and response to comments pertaining to the level of detail presented for the Phase 2 development program.

*Comment AW-42*

The comment states that several viable alternatives to the proposed Project were not chosen or further explored that would be the most environmentally friendly alternatives. The alternatives presented by the commenter include an alternative that would involve solely the retrofit of the Beach Cities Health District, and an alternative for development of the RCFE Building at an alternative site. However, it should be noted Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space* explores a seismic retrofit – funded by a local

bond measure – and Section 5.4, *Alternative Considered but Rejected from Further Analysis,* explores development on an alternate site. The alternative to develop on an alternate site was ultimately rejected due to the lack of sites and the economic infeasibility of purchasing a new site(s).

*Comment AW-43*

The comment restates the issues raised in Comment AW-42 and assert that retrofit of the existing Beach Cities Health Center would be the most environmentally sound option. The comment goes on to assert that development at an alternate site would provide greater access to services. Finally, the comment states that all of the alternatives currently have the RCFE positioned on the extreme edge of the northern and eastern site perimeter, and requests the EIR provided a detailed description and visual simulations of an alternative that provides greater setbacks. Refer to the response to Comment AW-42 regarding the consideration of a retrofit and development on an alternate site(s). Refer to the response to Comment AW-15 and AW-31 regarding the site planning constraints associated with the existing Beach Cities Health Center. These comments summarize the rational for the development of the building footprint and the revisions to the proposed Healthy Living Campus Master Plan aimed at minimizing the building frontage along the eastern boundary of the campus.

*Comment AW-44*

The comment questions the appropriateness for the BCHD to serve as leady agency for the proposed Project. Refer to Master Response 2 – BCHD as Lead Agency for detailed discussion and response to comments pertaining to this issue.

**Letter AN1**

April 3, 2021
Anonymous

*Comment AN1-1*

The comment restates the commenter's opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment AN1-2*

The comment expresses general issues regarding potential hazardous noise impacts on residents and school children located in the vicinity of the Project site. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to construction-related noise impacts on nearby sensitive receptors. It should be noted that the EIR discloses and discusses a significant and unavoidable impact on sensitive receptors adjacent to the campus along Flagler Lane and Flagler Alley. However, construction-related noise at Towers Elementary School would be less than the Federal Transit Administration (FTA) thresholds identified in the EIR. As such, the construction-impact of noise on the indoor learning environment would be less than significant. The comment does not challenge any specific aspects of the quantitative impact analysis in Section 3.11, *Noise* or provide any substantiating evidence to further support its assertions.

*Comment AN1-3*

This comment expresses a general opposition to construction trucks on neighborhood streets. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

The comment also briefly expresses concern regarding loss of views resulting from development of the proposed Project. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.1, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support or clarify its concerns. Refer to Master Response 9 – Aesthetics and

Visual Resources Analysis for a detailed discussion and response to comments pertaining to aesthetics and visual resources.

*Comment AN1-4*

The comment expresses general opposition to the proposed Project and suggests that there are many other plans where the proposed development could be sited. It is important to note that the EIR includes a thorough analysis of the potential for relocation of the existing Beach Cities Health District (BCHD) uses and development of proposed services and facilities to an alternative site. However, as described in Section 5.4, *Alternative Considered but Rejected from Further Analysis,* there are no sites that exist within the Beach Cities that are large enough to accommodate the proposed uses of the Project, are not currently occupied by other essential facilities, are currently zoned for uses consistent with those proposed under the Project, or are not constrained in other ways that would result in a similar or less degree of environmental impact. Additionally, even if a site were to become available, it may still be economically infeasible for BCHD to purchase a new site for the proposed development.

**Letter AN2**

May 23, 2021
Anonymous

*Comment AN2-1*

The comment states that all comments received by the Beach Cities Health District (BCHD) regarding the Draft Environmental Impact Report (EIR) must be included in the Final EIR as the public has a right to know all comments that were filed during the public comment period. California Environmental Quality Act (CEQA) Guidelines Section 15204 suggests that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* Nevertheless, consistent with CEQA Guidelines Section 15204[e]), all written and oral public comments, regardless of whether they address physical environmental issues, have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter AN3**

May 23, 2021
Anonymous

*Comment AN3-1*

The comment requests any comments received by Beach Cities Health District (BCHD) that are not included in the Final Environmental Impact Report (EIR). Refer to the response to Comment AN2-1. Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15204(e), all written and oral public comments, regardless of whether they address physical environmental issues, have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter AN4**

May 24, 2021
Anonymous

*Comment AN4-1*

The comment asserts, without substantial evidence or expert opinion, that various hazards would be present during construction of the proposed Project, including exposure to toxic materials during demolition, dust, noise pollution, new construction material pollution, and excess traffic, that would be exposed to nearby receptors. Each of these issues is thoroughly discussed within relevant sections of the Environmental Impact Report (EIR). For instance, Section 3.2, *Air Quality,* analyzes the potential impact that construction emissions, including particulate matter and fugitive dust, would have on air quality and the health of nearby sensitive receptors. This analysis is supported by exhaustive quantitative air emissions modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Section 3.8, *Hazards and Hazardous Materials,* presents an analysis of the potential impacts of the proposed Project resulting from worker exposure to construction material hazards and release of hazardous materials or contaminates to the general public and nearby sensitive receptors. This analysis is supported by the Phase I and Phase II Environmental Site Assessment (ESAs) as well as various other follow-up investigations. Section 3.11, *Noise,* presents a detailed quantitative analysis of noise impacts generated during construction activities on nearby sensitive receptors. Lastly, Section 3.14, *Transportation,* includes detailed discussion of potential impacts associated with roadway hazards, site access, effects on neighborhood cut-through traffic, and emergency access, supported by various transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Where applicable, the EIR includes appropriate mitigation necessary to reduce potential impacts

associated with construction and operation of the proposed Project. The comment does not challenge any specific aspect of this analysis provided in the EIR.

*Comment AN4-2*

The comment asserts that removal of the existing building materials may involve hazards, and that dust and these hazards could be carried to surrounding neighborhoods and schools by wind. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to concerns regarding construction hazard impacts. In addition to regulatory requirements and mitigation measures identified in Section 3.8, *Hazards and Hazardous Materials.* Additionally, the EIR also identifies Mitigation Measure (MM) AQ-1, which would require that all construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction. Implementation of these measures would reduce potential impacts from release or exposure to construction-related hazards to a less than significant level, preventing or avoiding impacts on the health of nearby sensitive receptors from occurring. Refer also to Master Response 11 – Hazards and Hazardous Materials as well as Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment AN4-3*

The comment asserts that there have been several accidents in the Torrance Pacific South bay neighborhood and that Project construction traffic may exacerbate the number/frequency of accidents and post risk to school children and pedestrians walking or riding along nearby streets. Detailed discussion of the Project's impact on traffic and roadway and pedestrian safety is presented in Section 3.14, *Transportation* under Impact T-3. As discussed therein, increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. Construction activities could also result in potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity, and impacts are considered potentially significant. However, to avoid construction-related safety hazards, the EIR identifies MM T-2, which would require the preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation.

*Comment AN4-4*

The comment asserts that noise poses a hazard to nearby sensitive receptors. However, the comment does not challenge any specific aspect of the thresholds, methodology, or results of the exhaustive quantitative noise modeling provided in the EIR. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to comments pertaining to this issue.

*Comment AN4-5*

The comment asserts that noise, pollution, and traffic may also be a hazard to the Redondo Village Shopping Center and may be disruptive to business. Please refer to response to Comment AN4-1 through AN4-4 for detailed response to concerns regarding noise, air quality, and traffic impacts on nearby receptors and surrounding uses.

*Comment AN4-6*

The comment asserts, again without any substantial evidence or expert opinion, that additional traffic generated by the proposed Project may be disruptive and present and danger to existing traffic and pedestrians. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to comments pertaining to vehicle, bicycle, and pedestrian mobility and safety.

*Comment AN4-7*

The comment asserts, again without any substantial evidence or expert opinion, that additional traffic will increase noise along roadways in the vicinity of the Project site, including within nearby residential neighborhoods, that will affect the peace and quiet of the area. However, the comment fails to acknowledge that the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. The comment does not challenge the thresholds, methodology, or results of this operational noise modeling effort. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding traffic noise.

*Comment AN4-8*

The comment states that due to the size of the Project, the sea breeze into the Pacific South Bay neighborhood will be disrupted, and some homes and school might need to spend more on air conditioning as a result. However, the comment does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore

wind patterns. Consistent with CEQA Guidelines Section 15204(b), *"if persons…believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant."* Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment AN4-9*

The comment states that property values for homes, particularly those closest to the Project site, would be adverse impacted. As described in Section 3.0, E*nvironmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potentially significant adverse physical effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

*Comment AN4-10*

The comment generally states, again without substantial evidence or expert opinion, that there may be severe consequences to neighborhoods, schools, and the shopping center, and that it is unclear what benefit the people and businesses would obtain from the Project. Refer to the response to Comment AN4-1 through AN4-9 for a response to community issues related to neighborhoods, schools, and the Redondo Village Shopping Center. Refer also to Master Response 3 – Purpose and Need and Master Response 4 – Project Objectives for a discussion of the underlying purpose and benefits of the proposed Healthy Living Campus Master Plan, which has been discussed in detail at numerous well-noticed public hearings

*Comment AN4-11*

The comment expresses opposition to the proposed Project and states that the proposed Project does not fit with the existing neighborhoods and schools and would create hazards and long-term quality of life impacts. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received,

incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter AN5**

June 15, 2021
Pacific South Bay Tract Homeowner

*Comment AN5-1*

The comment expresses general opposition to the proposed Project and states that current visual models and renderings of the Project are deceptive and do not represent views from adjacent neighborhoods, particularly the Torrance residential neighborhood east of the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to issues pertaining to the preparation of photosimulations and consideration of shade and shadows. As discussed therein, the analysis of aesthetic and visual resource impacts included the preparation of photosimulations depicted from representative views of the Project site from the surrounding area. Representative views include those from Tomlee Avenue (Representative View 1), Flagler Lane/Towers Street (Representative View 2), and Flagler Lane/Beryl Street (Representative View 3), which each representing views of the Project site from various angles and locations within the Torrance residential neighborhood located east of the Project site. The analysis of aesthetic and visual resource impacts also includes analysis of potential off-site shadow effects, as informed by shade and shadow simulations that were prepared for the proposed Project and presented in Appendix M. This analysis simulates shadows for the Summer Solstice, Autumnal (Fall) Equinox, and Winter Solstice at various times between sunrise and sunset. By modeling shadows for the Autumnal Equinox and the Summer and Winter Solstices, it is possible to see, understand, and analyze the worst and best-case scenarios of future shadow effects.

The comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support its assertions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For issues related to building height and neighborhood compatibility, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

*Comment AN5-2*

The comment expresses concerns regarding potential decreases in property valuation for nearby residences and inquires as to whether the Beach Cities Health District (BCHD) will provide compensation. As described in Section 3.0, E*nvironmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

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**Letter AN6**

June 10, 2021
Anonymous

*Comment AN6-1*

The comment asserts, without substantial evidence or expert opinion, that the Environmental Impact Report (EIR) minimizes impacts and makes assumptions on most categories of the California Environmental Quality Act (CEQA), but focuses comments on analysis of aesthetics and visual resources. The comment asserts that the proposed Project is incompatible with surrounding neighborhoods, claims that the proposed Project is not allowed under the Redondo Beach Municipal Code (RBMC) or the Torrance Municipal Code (TMC), and that the description of impacts on aesthetics and visual resources are wrong. However, the comment does not specifically challenge any aspects of the impact analysis included in Section 3.1, *Aesthetics and Visual Resources*, which is informed by photosimulations prepared by VIZf/x, a licensed architect

specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, as well as renderings of the development under Phase 2 and a detailed shade and shadow analysis. The comment also does not challenge any specific aspect of the policy consistency analysis described under Impact VIS-2. As such, the assertion that the proposed Project was permanently ruin the surrounding neighborhood and the South Bay is wholly unsupported.

*Comment AN6-2*

The comment requests that the EIR address violations with City of Torrance General Plan Policy LU.2.1 and Policy LU.3.1, and City of Redondo Beach General Plan Policy 1.46.4. However, the comment does not provide any further detail regarding how or why the proposed Project violates these policies. Consistency with applicable policies of the City of Redondo Beach and City of Torrance General Plans is presented and analyzed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5. As presented therein, the proposed Project would not present any conflict with either of these three policies. Specific issues related to Redondo Beach General Plan Policy 1.46.4 as well as Torrance General Plan Policy LU.2.1 and LU.3.1 are also addressed in the response to Comment TRAO-19.

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**Letter AT**

June 15, 2021
April Telles
112 Via El Chico
Redondo Beach 90277

*Comment AT-1*

The comment expresses opposition to the proposed Project and asserts, without any substantiating evidence or expert opinion, that it would not integrate well with the surrounding neighborhood and will block air flow and cast significant shadows. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This Environmental Impact Report (EIR) provides a primary source of environmental information for the Beach Cities Health District (BCHD) Board of Directors and other responsible agencies exercising any permitting authority or approval power directly related to implementation of the proposed Project. However, it is not the purpose of an EIR to recommend approval or denial of the proposed Project. With regard to integration with the surrounding neighborhood and shade/shadows the comment does not challenge any specific aspects of the analysis provided in Section 3.2, *Aesthetics and Visual Resources* or any of the visual character analysis provided under

Impact VIS-2 or the shade/shadow analysis provided under Impact VIS-4. Please refer to Master Response 9 – Aesthetics and Visual Resources Analysis for issues related to neighborhood compatibility and shade and shadows.

The comment also asserts that the proposed Project would block air space/flow, but does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore wind patterns. Consistent with CEQA Guidelines 15204(b), "*if persons…believe that the project may have a significant effect, they should:*

*(4) Identify the specific effect,*

*(5) Explain why they believe the effect would occur, and*

*(6) Explain why they believe the effect would be significant"*

*Comment AT-2*

The comment states, without substantiating evidence or expert opinion, that traffic and noise impacts would be greatly increased during construction and operation of the development described for the proposed Healthy Living Campus Master Plan. The comment does not challenge any specific aspect of the analysis of construction and operational impacts provided in Section 3.14, *Transportation* or Section 3.11, *Noise*. In particular, the comment does not identify potential impacts in relation to the thresholds of significance identified for each of these environmental topic areas, which have been carefully applied to determine whether a potential impact is potentially significant or less than significant. For issues related to construction-related and operational transportation impacts, refer to Master Response 13 – Transportation Analysis. Additionally, for issues related construction-related and operational noise impacts, refer to Master Response 12 – Noise Analysis.

*Comment AT-3*

The comment asserts that construction activities associated with the proposed Project would result in negative health impacts related to air quality (e.g., inhalation of suspended particulate matter [$PM_{10}$]). As described further in Master Response 10 – Air Quality Analysis, the EIR includes extensive quantitative analysis of air quality impacts on nearby sensitive receptors, both as a result of construction and operation of the development under the proposed Healthy Living Campus Master Plan. This analysis of criteria air pollutant emissions is supported by modeling results that rely on the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod) Additionally, the analysis of Toxic Air Contaminants (TACs) is supported by modeling results that rely on the U.S. Environmental Protection Agency's

(USEPA's) AERMOD and the California Air Resources Board's (CARB's) Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool. The comment does not challenge the methodology, assumptions, or results of these extensive modeling efforts that informed the air quality impact analysis in the EIR, which show that with the implementation of required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts to sensitive receptors would be less than significant when compared to the SCAQMD thresholds for criteria pollutant emissions and the CARB thresholds for TACs.

The comment also claims the proposed Project would generate significant greenhouse gas (GHG) emissions during construction and operation. However, as shown in Table 3.7-6 and 3.7-7, the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. As described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, the net reduction in annual operational-related GHG emissions is primarily attributable to decreases in mobile source GHGs over time as Federal and State combustion emissions standards become more stringent in future years. Emissions from mobile sources would decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards. As such, the proposed Project would not generate GHG emissions that may have a significant impact on the environment.

*Comment AT-4*

The comment expresses general concern over noise and vibration impacts under the proposed Project but does not provide any specifics regarding these concerns. For general issues related to noise and ground-borne vibration refer to Master Response 12 – Noise Analysis.

*Comment AT-5*

The comment expresses general concern over potential hazards and hazardous materials impacts, particularly construction-related impacts, under the proposed Project but does not provide any specifics regarding these concerns. For general issues related to hazards and hazardous materials refer to Master Response 11 – Hazards and Hazardous Materials Analysis.

*Comment AT-6*

The comment states that the proposed tree removal required for implementation of Phase 1 and Phase 2 of the proposed Healthy Living Campus Master Plan would result in an increase in carbon. The EIR includes adequate discussion of the potential impacts and mitigation of construction and operational GHGs in Section 3.7, *Greenhouse Gas Emissions and Climate Change* under Impact

GHG-1. While the removal of trees may result in a short-term release of carbon into the atmosphere, as described in the response to Comment AT-4, the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. It should also be noted that while construction-related activities would require some tree removal, the landscaped vegetation would be replaced under the proposed landscaping plan.

*Comment AT-7*

This comment voices general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter ABP**

June 15, 2021
Arlene & Bob Pinzler

*Comment ABP-1*

The comment raises general issues related to the project objectives, phasing of proposed improvements, likelihood that residents will be able to afford proposed uses, and a perceived lack of commitment for implementation of the Phase 2 development program. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the benefits of the proposed Project. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments pertaining to the affordability of Assisted Living and Memory Care units, particularly for residents of Redondo Beach. Lastly, refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to the proposed implementation of the Phase 2 development program.

*Comment ABP-2*

The comment raises general issues regarding the height of proposed structures and area of open space proposed between the 2019 and 2020 iterations of the proposed Healthy Living Campus Master Plan. As described in Master Response 9 – Aesthetics and Visual Resources Analysis, BCHD has revised the footprint of the RCFE Building to further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of

Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in height to the single- and multi-family residential development along Beryl Street.

The comment goes on to correctly state that these revisions to the 2019 Master Plan also resulted in a reduction in open space. However, as clearly described in Section 2.0, *Project Description* and shown in Table 1-2, open space would still be increased from 0.3 acres on the existing BCHD campus to 2.45 acres under the proposed Healthy Living Campus Master Plan.

*Comment ABP-3*

The comment asserts that even if the proposed Project were implemented, BCHD is not committed to the implementation of Phase 2. This comment does not address the adequacy of the EIR or its evaluation of physical environmental impacts. Section 2.0, *Project Description*, clearly describes the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. For these reasons the description of potential environmental impacts associated with Phase 1 and Phase 2 were very clearly described and delineated in the analysis. For example, air emissions, noise, and trip generation were independently calculated for Phase 1 and Phase 2.

*Comment ABP-4*

The comment asserts, without substantiating evidence, that the project objectives appear to persuade the reader that the proposed Project would be a natural extension of BCHD's mission, rather than describing an expansion of BCHD's mission and scope of services. The comment goes on to assert, again without substantiating evidence or expert opinion, that the proposed Project does not belong within a residential area on land that is owned by a public agency and zoned P-CF (Community Facility). Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the benefits of the proposed Project. Refer to

Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

*Comment ABP-5*

The comment asserts, without substantial evidence or expert opinion, that the residents of Redondo Beach and Torrance would be subjected to construction and operational impacts from noise, dust, traffic disruption, poorer air quality, and visual blight that would be caused by implementation of the proposed Project. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. The comment further asserts, again without substantial evidence or expert opinion, that the majority of residents would not be able to afford to live within the proposed facilities, making the proposed Project an even less appropriate use of BCHD's property.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment ABP-6*

The comment states that it is not within BCHD's scope of services to provide Assisted Living and Memory Care to seniors, stating that the proposed Project. As described in the response to Comment ABP-4, for decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. For example, a Conditional Use Permit (CUP) is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory

Care Community. Implementation of the proposed Project would not substantially alter these land uses.

**Letter BE**

June 9, 2021
Barbara Epstein
Redondo Beach

*Comment BE-1*

The comment expresses general opposition to the proposed Project and asserts, without substantial evidence or expert opinion, that it would harm the neighboring communities and schools with unreasonable physical and mental health risks during the long construction process. The comment also asserts that the proposed Project would be too great a burden with no resulting benefit to the public. Potential impacts to sensitive receptors are described in detail within the relevant sections of the EIR, including, but not limited to Section 3.2, *Air Quality*, Section 3.11, *Noise*, Section 3.14, *Transportation*, etc. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

*Comment BE-2*

The comment states the Environmental Impact Report (EIR) is flawed, without providing any substantial evidence or details regarding how or why the EIR is flawed. Consistent with the requirements of the California Environmental Quality Act (CEQA), this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment BE-3*

The comment states that the existing structures that have been deemed unsafe have many good years of service left. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to issues related to seismic safety. It should be noted that the No Project Alternative does consider continued operation of the existing facilities on the BCHD campus would continue to be operated until it becomes infeasible to do so due to financial issues or public safety issues.

*Comment BE-4*

The comment asserts, without substantial evidence or expert opinion, that the proposed structures are too high and large, and would impose unacceptable visual and sun blocking mass to the skyline at the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to visual character as well as shade and shadows.

*Comment BE-5*

The comment states that the City of Redondo Beach has been victimized by gifting public lands and assets to entrepreneurs for private gain. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the benefits of the proposed Project. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

*Comment BE-6*

This comment states that the Project has no value to the public, that the cost of senior care will be too high for anyone to afford, if senior care is necessary, it should be provided at basic cost and subsidized so any senior could afford it. See BCD Master Response 5 – Affordability of RCFE

Assisted Living and Memory Care Units for detailed discussion and response to comments regarding the affordability of senior care facilities.

*Comment BE-7*

The comment states that if the existing buildings are unsafe, they should be taken down and the site planted with an urban forest, community garden, workout areas, and nature park to provide a healthy place for exercise, growing healthy food, and restful relaxation and mediation. Refer to the response to Comment FL1-25 for a detailed discussion and response to comments pertaining to this suggested alternative.

*Comment BE-8*

The comment asserts that the Project has advanced forward against the will of the public and should be abandoned. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter BP**

June 9, 2021
Bonnie Pierce
1714 Huntington Lane #A
Redondo Beach, CA 90278

*Comment BP-1*

The comment expresses general opposition to the Project, asserting, without substantial evidence or expert opinion, that it is oversized and out of proportion to the area. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter BO-1**

April 4, 2021
Brian Onizuka
5500 Block of Towers Street

*Comment BO-1*

The comment expresses general opposition to the Project. The comment states that there is heavy traffic from Towers Elementary School and any obstruction to Flagler Lane should not be considered. The comment goes on to describe that an alternate site should be considered. It should be noted that Section 3.14, *Transportation* provides a detailed discussion of existing cut-through traffic related to Towers Elementary School as well as description of the pilot program that is being implemented by the City of Torrance to address this issue. However, as described in Section 3.14, *Transportation* the implementation of the proposed Project would not exacerbate cut-through traffic or result in potential safety conflicts. It should also be noted that a discussion of alternate sites is provided in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter BW1-1**

June 4, 2021
Brian Wolfson

*Comment BW1-1* through *Comment BW-37*

The individual comments provided are identical to the Comments TRAO-39 through TRAO-66 as well as Comments TRAO-67 through TRAO-80. These comments are responded to individually in Letter TRAO.

*Comment BW1-38*

The comment asserts that the cumulative analysis presented in the Environmental Impact Report (EIR) is flawed because it paints an incomplete picture and fails to look at the full effect of other projects in the area. The comment provides specific reference to the Redondo Beach Police Department Shooting Range Upgrade project, asserting that the relevant facts and analysis is note stated. This issue of the cumulative impacts is also identified and responded to in Comment TRAO-98 through TRAO-107.

With regard to the shooting range in particular, as described in the response to Comment TRAO-101, it should be noted that the Police Department Shooting Range is clearly identified as a cumulative project (refer to Table 3.0-1). This cumulative project is specifically referenced in the

cumulative aesthetics and the cumulative hazards and hazardous materials analyses given the proximity of the site to the BCHD campus. As described in the cumulative impact analysis within Section 3.11, *Noise*, the proposed campus would be required to comply with the Redondo Beach and Torrance noise regulations and would not result in a potentially significant impact due to operational noise. Neither publicly available designs nor CEQA documentation for the Police Department Shooting Range were available at the time of the preparation of the EIR. Therefore, a quantitative noise analysis for the proposed shooting range was not available. Nevertheless, given that the proposed Project would comply with the requirements of the City of Redondo Beach and the City of Torrance noise ordinances, including all maximum permissible sound level requirements by land use type, the proposed Project would not substantially contribute to a cumulatively considerable noise impact.

*Comment BW1-39*

The comment asserts that the EIR fails to identify most of the associated cumulative impacts of the Dominguez Park improvements and the Redondo Beach Police Department Shooting Range Upgrade project. This issue is raised and responded to directly in Comment TRAO-107.

*Comment BW1-40*

The comment inaccurately asserts that the EIR analysis of cumulative impacts fails to consider the BCHD Bike Path Project. This issue is raised and responded to directly in Comment TRAO-100.

*Comment BW1-41*

This comment claims that the analysis fails to assess the cumulative impacts of the proposed Project on the Redondo Beach Historical Museum and the Morrell House, which are located in Dominguez Park. This issue is raised and responded to directly in Comment TRAO-104.

*Comment BW1-42*

The comment asserts that the redevelopment of the AES Redondo Beach Power Plant should be evaluated as a cumulative project. This issue is raised and responded to directly in Comment TRAO-99.

*Comment BW1-43*

The comment asserts that the EIR fails to say how BCHD staff assigned to the proposed 31,300 square foot (sf) Aquatic Center pool will be properly trained and fails to consider the impacts this component will have on Emergency Medical Service (EMS) and public safety. These issues are raised and responded to directly in Comment TRAO-107.

*Comment BW1-44*

The comment summarizes prior comments BW1-39 through BW1-43. Refer to the individual responses to Comments BW1-39 and BW1-43 for a further discussion.

*Comment BW1-45*

This comment asserts that the existing campus is an area of high cultural sensitivity and Native American monitoring is required for all ground-disturbing activities. Nevertheless, MM CUL-1a and -1b requires Native American Monitoring and the development of an Archaeological Resources Monitoring Plan. A Native American tribal monitor and qualified archaeologist shall be required during ground disturbing activities during the construction activities associated with Phase 1 and Phase 2 of the proposed Project.

*Comment BW1-46*

This comment asserts that BCHD has violated the Los Angeles Local Area Formation Commission (LAFCO) restrictions. This issue is raised and responded to directly in Comment TRAO-85.

*Comment BW1-47*

This comment states that the information provided for the proposed SCE Substation is insufficient. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard a detailed discussion and response to comments pertaining to these issues. It should be noted that the comment does not provide any substantial evidence or expert opinion regarding the assertions that the proposed substation would result in cancer-causing effects. Consistent with CEQA Guidelines Section 15204(b), *"if persons…believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant."*

Nationally and internationally recognized scientific organizations and independent regulatory advisory groups have been organized to conduct scientific reviews of the EMF research and peer reviewed publications. Their ability to assemble experts from a variety of disciplines to review the full body of research on this complex issue gives their reports credibility. Without exception, these major reviews have reported that the body of data, as large as it is, does not demonstrate that exposure to power-frequency magnetic fields causes cancer or poses other health risks, although the possibility cannot be dismissed. Because of the uncertainty, most reviews recommend further research, and, appropriately, research is ongoing worldwide. The weakness of the reported epidemiological associations, the lack of consistency among studies, and the severe limitations in exposure assessment in the epidemiological studies, together with the lack of support from

laboratory research, were key considerations in the findings of the scientific reviews. Additional information is provided in *Understanding electric and magnetic fields*, which can be found here: https://www.sdge.com/sites/default/files/final_emf_s1510006_eng.pdf.

Pursuant to CEQA Guidelines Section 15151, *"[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts."*

The comment goes on to assert that the hazardous impacts associated with trenching are not sufficiently explained. This issue is addressed in detail in Section 3.8, *Hazards and Hazardous Materials*. The proposed trenching would disturb soils contaminated with tetrachloroethylene (PCE), however, as described in detail under Impact HAZ-2, PCE generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). With the implementation of the Mitigation Measures (MM) HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant.

**Letter BW2**

June 8, 2021
Brian Wolfson

*Comment BW2-1*

The comment introduces the comment letter and attachments, including an excerpt of California Environmental Quality Act (CEQA) Section 15088.5. This comment has been noted.

*Comment BW2-2*

This individual comment is identical to and responded to in response to Comment BW2-1.

*Comment BW2-3*

The comment provides a summary of the proposed Project and notes that Phase 2 is programmatic in nature and is not currently funded. As described in Master Response 6 – Financial Feasibility/Assurance, while funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would

help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the RCFE Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory Care community as well as the Program of All-Inclusive Care for the Elderly (PACE) within the Residential Care for the Elderly (RCFE) Building. In addition, the Beach Cities Health District (BCHD) would continue to be able to seek and secure appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

*Comment BW2-4*

The comment asserts that the Beach Cities Health Center does not require seismic retrofit and BCHD is only interested in generating revenue from the Project. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the campus. However, recognizing that the structures pose a potential public safety hazard for future building tenants, patients, and residents, the BCHD Board of Directors prioritized elimination of seismic-related hazard in concert with the proposed redevelopment of the Healthy Living Campus.

With regard to revenue generation specifically, it should be noted that the project objectives do not attempt to disguise that the development under the proposed Healthy Living Campus Master Plan must be financially viable. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs.

*Comment BW2-5*

The comment incorrectly claims that the proposed Project is incompatible based on the City of Redondo Beach's and City of Torrance's regulations, policies, and design guidelines governing aesthetics and visual resources. The proposed Project would be consistent with RBMC Section 10-2.622, which includes maximum height limits along with other development standards for the C-

2 zone designation that governs the vacant Flagler Lot. The RBMC does not specify building heights or floor area ratios (FARs) for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for additional discussion and response to comments pertaining to building height and neighborhood compatibility.

*Comment BW2-6*

The comment states that the EIR inaccurately describes the visual resources that make the area unique and fails to recognize views that lead up to the marina as well as landmarks such as the Portofino Hotel. The comment continues that there are *"several unique view corridors within the area that extend between streets to provide unfettered views of the bay and sunsets."* It should be noted that views of the bay and the Portofino Hotel are from view points located north, west, or south of the Project site. Given the topography of the area, views of the bay to the west are not available from viewpoints to the east of the Project site, and the proposed Project would not obstruct views of the ocean.

The comment goes on to claim that due to the size of the Project, it would alter panoramic public views from the Wilderness Park and other high points, such as the Palos Verdes hills. The comment provides a picture that appears to be taken from Hopkins Wilderness Park through a tree towards the Project site. It should also be noted that the EIR describes views *"of"* the Palos Verdes hills as a significant visual resource in the Project vicinity, rather than views *"from"* the Palos Verdes hills towards the Project site, which are not identified as an important scenic vista in the City of Rancho Palos Verdes General Plan. Scenic vistas identified in the City of Rancho Palos Verdes General Plan include views towards the City of Torrance to the northwest and views facing the Pacific Ocean.

*Comment BW2-7*

The comment claims that the proposed rooftop dining area located in the RCFE Building and the proposed access along Flagler Lane would be in violation of the zoning codes of the cities of Redondo Beach and Torrance. The Healthy Living Campus Master Plan architectural drawings for the proposed RCFE Building were developed by Paul Murdoch Architects with careful review of the RBMC. There are no such provisions in the code for P-CF or C-2 that would seem to prohibit the proposed rooftop garden. Nevertheless, pursuant to the RBMC Section 10-2.1806, the proposed Project will undergo a Planning Commission Design Review and BCHD will make changes to the plan, if necessary.

Regarding the proposed driveways along Flagler Lane, Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

*Comment BW2-8*

The comment claims that the EIR does not analyze the impacts to privacy regarding the multi-family residential buildings adjacent to the north of the site and that the RCFE Building would provide direct sight lines into private interior living spaces of these residences. The comment incorrectly claims that this must be analyzed in the EIR. As described in Section 3.1.3, *Impact Assessment and Methodology*, only public views, not private views, need be analyzed under CEQA. In 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views are not considered under CEQA (Public Resources Code Section 21082.2). Nevertheless, Master Response 9 – Aesthetics and Visual Resources provides a detailed discussion and response to comments pertaining to privacy. Notably, while residential areas would still be visible from some areas of the campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

*Comment BW2-9*

The comment suggests that the EIR as well as BCHD lack consideration of public input and the public review process. The comment also claims that BCHD has misled residents to get what they want and uses their political capital in order to get special treatment and operate above the law. These comments do not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* However, the EIR thoroughly discusses the public participation process that BCHD has engaged in since the start of the Project in 2017. As discussed in Section 1.6, *Project*

*Background*, BCHD formed the 20-person CWG to engage local participants in the planning of a modernized campus that would be integrated with the surrounding community including Redondo Beach and the Torrance. The CWG held 17 meetings to discuss various components of the proposed Healthy Living Campus Master Plan and was eventually dissolved in December 2020 following the conclusion of the preliminary planning and design phases for the proposed Healthy Living Campus Master Plan.

BCHD staff also conducted outreach for the proposed Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan. Study circles (i.e., informal group sessions) were comprised of diverse stakeholders from Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach and were designed to encourage local input into the planning process for the proposed Healthy Living Campus Master Plan. BCHD also held two community Open House events in November 2017 and March 2019 to inform community members and key stakeholders of the plans being considered. Open House events also provided an opportunity for attendees to ask questions and contribute comments. The first Open House introduced the proposed Healthy Campus Master Plan and provided nine informational stations, including but not limited to About BCHD, Project Overview, Community Need, EIR Process, and CHF. The second Open House provided the general public with an updated description of the Healthy Living Campus project, visualizations of its design, walking tours of the campus and opportunities for public involvement.

The public was provided an opportunity to comment on the scope of the EIR through a NOP which was made available to Federal, State, and local agencies and interested members of the public through various methods. The NOP was advertised to the general public electronically on the BCHD website and monthly calendar, via news releases, and posters placed in the BCHD Community Services office and CHF. Physical copies of the NOP and IS were delivered to public libraries including Redondo Beach Main, North Branch, Hermosa Beach, Manhattan Beach, and Isabel Henderson branch in Torrance. The NOP and IS were also distributed to the Governor's OPR, school superintendents, and City Councilmembers in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach. The NOP comment period ran from June 27, 2019 to July 29, 2019. During this comment period, BCHD held five public scoping meetings in July 2019, including one in Manhattan Beach, one in Hermosa Beach, two in Redondo Beach, and one in Torrance. Comments made during the comment period for the NOP were considered and addressed during EIR preparation (refer to Section 1.8, *Areas of Known Controversy* and Appendix A).

The refined Healthy Living Campus Master Plan as analyzed in this EIR was developed from more than 60 meetings over 2 years attended by more than 550 community members and drawing more than 1,000 comments regarding individual elements of the Master Plan (refer to Table 1-1 for a timeline of key community outreach events associated with the proposed Project). Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a full discussion of previous revisions to the Project in response to public comments as well as building height and neighborhood compatibility.

With regard to claims that BCHD has misled the public and operates above the law, these claims are unfounded and unsubstantiated. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

*Comment BW2-10*

The comment asserts that individual residents who purchased property in the Project vicinity over the last 60 years did not know that the public views and aesthetics would be for sale or could be eliminated. This comment does not pertain to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment BW2-11*

The comment quotes several segments of the EIR's aesthetics and visual resources analysis, particularly with regard to the Project's impact to open sky views from various representative views, and repeatedly claims the EIR does not address or mitigate these impacts. As described in detailed in Master Response 9 – Aesthetics and Visual Resources Analysis, the environmental impact analysis provided in the EIR acknowledges that the proposed RCFE Building, when viewed from Representative Views 2, 3, and 4, would be located closer to the edges of the campus and would appear substantially taller with substantially more massing than the existing buildings on the campus as well as the other existing buildings. However, the building would be partially screened by existing large canopy trees along Beryl Street. The proposed landscaping surrounding the RCFE Building would also provide some screening to soften views of the Project site's street frontage from this location. While the massing of the proposed RCFE Building would be greater than existing conditions, the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from this location. Additionally, MM VIS-1, which would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) to approximately 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot), would further reduce impacts related to loss of open sky views in the Project vicinity.

The comment also asserts that the EIR does not include an assessment of or clear visual aids for the visual impact of the proposed Phase 2 buildings. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program. As described therein, a program EIR generally analyzes a project for which less specific detail is currently known, but would be developed at a later date.

The visual impact analysis relies on the best available information for the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (CEQA California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment BW2-12*

The comment describes community concerns related to private views, stating they will lose their right to privacy without just compensation or due process. Refer to Comment Response BW2-11 and Master Response 9 – Aesthetics and Visual Resources Analysis for discussion and response to comments pertaining the privacy issues.

The comment continues by stating that the proposed Project would cover other properties in shade for hours each day and affect rooftop solar collectors in the vicinity. As described in Master Response 9 – Aesthetics and Visual Resources Analysis, the EIR provides a detailed analysis of Project impacts to shade and shadow on sensitive shade receptors in the vicinity, including residential receptors and solar collectors.

*Comment BW2-13*

The comment asserts that MM VIS-1 is flawed, stating that the mitigation measure is subjective and lacks sufficient data to be conclusive. MM VIS-1 is not subjective and is based on a Sight Line Study prepared by VIZf/xx As described under Impact VIS-1 in Section 3.1, *Aesthetics and Visual Resources*, the Sight Line Study prepared by VIZf/x determined the RCFE Building would need to be reduced in height by 20 feet and 3 inches in order to remain below the ridgeline of the Palos Verdes hill from Representative View 6. A visual aid graphic is also provided therein to demonstrate the height reduction required to remain below the ridgeline of the Palos Verdes hill from Representative View 6. With implementation of MM VIS-1, the proposed RCFE Building would be reduced at least 82.75 feet above existing campus ground level and 113.25 feet above the vacant Flagler Lot below, and impacts would be less than significant with mitigation.

*Comment BW2-14*

The comment claims that the Project conflicts with Policy 1.46.5 of the Redondo Beach General Plan, the Project would have a significant visual impact on the area, and that BCHD has no authority to alter views of the open sky, Pacific Ocean, and Palos Verdes ridgeline, which are recognized as important visual resources. Policy 1.46.5 of the Redondo Beach General Plan states *"[r]equire, where the City has jurisdiction, that public sites be designed to incorporate landscaped setbacks, walls, and other appropriate elements to mitigate operational and visual impacts on adjacent land uses."* As described in Table 3.1-2 under Impact VIS-2, the proposed buildings would meet the setback requirements prescribed for development in a parcel zoned for C-2. Additionally, the proposed Project would be subject to a Planning Commission Design Review, consistent with requirements for development in a parcel zoned for P-CF. The proposed RCFE Building has been sited along the northern perimeter of the Project site behind the Redondo Village Shopping Center. This would create a terraced effect with the building height decreasing from the campus to the Redondo Village Shopping Center and ultimately further down to the residential land uses on the north side of Beryl Street. This proposed orientation would reduce the perceived bulk, mass, and scale of development when viewed from Beryl Street. Additionally, the location of the proposed RCFE Building along the northern perimeter of the Project site would reduce the visual impact on the adjacent land uses to the west along North Prospect Avenue and to the east in

the Torrance neighborhood. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening and soften the views of the campus (refer to Figure 2-9). Similarly, the northern border of the campus would be lined with shade and flowering ornamental trees to soften the views from the Redondo Village Shopping Center. The Planning Commission Design Review would further refine the final design of Phase 1 and Phase 2 such that the proposed development would be consistent with the objectives and policies in the Redondo Beach General Plan Land Use Element including Policy 1.46.5.

The comment again asserts that BCHD must be required to provide visual aids to evaluate impacts associated with Phase 2 of the Project. Refer to Comment Response BW2-12 and Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program.

*Comment BW2-15*

The comment incorrectly claims that the EIR fails to disclose the potential for light impacts associated with Phase 2 development of the Project. The comment fails to acknowledge the discussion of light impacts disclosed for both Phase 1 and Phase 2 of the Project, which is provided under Impact VIS-3 in Section 3.1, Aesthetics and Visual Resources.

The comment again asserts that the analysis of visual impacts associated with Phase 2 of the Project is insufficient. Refer to Comment Response BW2-12 and Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program.

*Comment BW2-16*

The comment asserts that the proposed Project would significant increase air, noise, and light pollution and incorrectly claims the EIR does not assess potential air quality impacts on the commercial uses located adjacent to the north of the site. Impacts associated with localized air emissions are assessed in Section 3.2, *Air Quality*. As described in Section 3.2.3, *Impact Assessment and Methodology*, CO and $NO_2$ LST thresholds apply to both residential and off-site worker receptors (i.e., people who work in businesses off-site). $PM_{10}$ and $PM_{2.5}$ LST thresholds are relevant to sensitive receptors that are reasonably likely to be present for 24 hours or longer. Since off-site worker receptors are not expected to be present for this duration, $PM_{10}$ and $PM_{2.5}$ LST thresholds do not apply to off-site worker receptors. As described under Impact AQ-2, off-

site worker receptors include employees within the Redondo Village Shopping Center to the north of the Project site. Table 3.2-6 provides the estimated unmitigated localized on-site construction emissions for sensitive residential receptors as well as employees within the Redondo Village Shopping Center (off-site worker receptors) compared to LSTs for receptors located within 25 meters from the Project site. As described therein, localized construction emissions would not exceed CO and $NO_2$ LST thresholds for off-site worker receptors during construction associated with Phase 1 and Phase 2 of the proposed Project. As described in Table 3.2-7, implementation of MM AQ-1, which would require preparation and implementation of an Air Quality Management Plan, would further reduce localized construction emissions at sensitive receptors, including off-site worker receptors during Phase 2 construction. Therefore, the EIR thoroughly discloses and addresses the potential impacts associated localized construction emissions at off-site worker receptors.

The comment also claims mitigation measures provided in Section 3.2, *Air Quality* do not provide details of enforcement or penalties for failure to comply with the mitigations. The Air Quality Management Plan would be subject to review and approval by the cities of Redondo Beach and Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. MM AQ-1 has been revised to further clarify the enforcement capabilities of the City of Redondo Beach. Construction contractors would be required to ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD would be required to demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction.

*Comment BW2-17*

The comment states that the determination of compliance with Policy LU.4.3 of the Torrance General Plan should be revised due to the potential conflict with TMC Section 92.30.8. Policy LU.4.3 states *"Require that new development projects provide their full fair share of the improvements necessary to mitigate project generated impacts on the circulation and infrastructure systems."* Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

The comment also notes that additional traffic would increase impacts associated with air quality, harming humans, pets, and wildlife in the vicinity. The EIR thoroughly describes and addresses air quality impacts related to Project operational activities in Section 3.2, *Air Quality*. Potential impacts to wildlife are addressed in Section 3.3, *Biological Resources*.

*Comment BW2-18*

The comment asserts that the EIR must revise Policy LU.9.1 in Table 3.10.5 to note that the native plant species proposed for landscaping attract coyotes, as identified in the City of Torrance's coyote abatement strategy. This comment provides no reference for the coyote abatement strategy and no such plan is available online for the City of Torrance. It is important to note that while the City of Torrance has published a 2019 Coyote Management Plan, this plan does not identify an issue with native landscaping attracting coyotes. The only reference to landscaping in this plan is the statement that homeowners should *"[t]rim vegetation to reduce hiding places and potential denning sites."*

Refer to Comment Response PF-20 for discussion and response to comments pertaining to the proposed landscaping plan and concerns related to coyotes.

*Comment BW2-19*

The comment states that the determination of compliance with Policy LU.11.9 of the Torrance General Plan should be revised due to the proposed landscaping improvements along the Torrance Hillside Overlay. The comment further claims that the landscaping improvements would result in significant environmental impacts to the residences adjacent to the east of the Project site. However, it is important to note that activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way. The City of Torrance's jurisdictional land use boundary does not extend further into the campus. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are addressed in Section 3.10-5. Consistency with individual policies will also be considered by the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way.

*Comment BW2-20*

The comment claims that the proposed Project must be moved west and that the No Project Alternative is the best alternative. These comments do not pertain to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless,

comment has been noted and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment BW2-21*

The comment expresses concern regarding operational noise levels associated with a party patio atop the PACE center in the RCFE Building. It should be noted that no such party patio is proposed as part of the Project. The Project proposes a Garden Roof Deck above the northern portion of the RCFE Building as shown in Figure 2-7, Open Space and Landscaping. Further, operational noise levels are thoroughly disclosed and discussed in Section 3.11, *Noise*. With regard to community events within the publicly accessible open space, all applicable permits would be obtained from the City of Redondo Beach, as necessary. Additionally, consistent with MM NOI-3b an Events Management Plan would be prepared and implemented to ensure consistency with the Redondo Beach and Torrance noise ordinances.

*Comment BW2-22*

The comment asserts that the operational noise levels associated with proposed community events at the Project site would permanently change the character of the neighborhood and suggests the mitigation measures proposed to control operational noise levels are insufficient and prone to human error. However, the comment does not challenge any aspects of MM NOI-3a through -3c and does not provide suggestions to make the mitigations sufficient. Implementation of MM NOI-3b would require BCHD to prepare an Events Management Plan to include, but not be limited to, establishment of procedures to limit noise generated by operations on the proposed BCHD Healthy Living Campus, particularly for outdoor events. The Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the RBMC and TMC. Limitations on outdoor events shall include prohibiting the use of amplification systems for outdoor events after 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria and review of the proposed sound system by a qualified acoustical engineer to ensure that event set ups would meet the acceptable exterior noise criteria of 50 to 55 dBA consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2. Therefore, implementation of MM NOI-3b would ensure noise levels from outdoor dining spaces, fitness classes, and community events do not occur after 10:00 p.m. consistent with RBMC Section 4-24.401 and TMC Section 6-46.7.2. Compliance with RBMC Section 4-24.401 and TMC Section 6-46.7.2, as well as the implementation of MM NOI-3b, which would require preparation of an Event Management Plan, would reduce noise impacts related to outdoor events to less than significant with mitigation. Additionally, MM NOI-3c (Outdoor Pool Activities) would require the proposed Aquatics Center to close operations by 10:00 p.m. to comply with RBMC and TMC lower

nighttime noise level criteria, which would further reduce operational noise impacts. As such, the mitigation measures established in Section 3.11 sufficiently mitigate operational noise to levels below significance.

*Comment BW2-23*

The comment asserts that if an alternative location for the Project is infeasible, BCHD must identify specific steps to ensure on-site or off-site creation, enhancement, restoration, and/or protection and management of ancestral lands in perpetuity. The comment also asserts that the EIR should be revised to state that the Project site is located on Native American land. Section 3.4, *Cultural Resources and Tribal Cultural Resources* describes that the Gabrieleño/Tongva occupied territory that included the Los Angeles Basin south to parts of Orange County and north to Topanga Canyon and the southern Channel Islands.

Nevertheless, MM CUL-1a and -1b requires Native American Monitoring and the development of an Archaeological Resources Monitoring Plan. A Native American tribal monitor and qualified archaeologist shall be required during ground disturbing activities during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The Archaeological Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary. Therefore, implementation of EIR and required mitigation measures sufficiently address the potential for impacts to tribal cultural resources during ground-disturbing construction activities associated with the proposed Project.

The comment further asserts that site monitors are an insufficient mitigation measure and that greater mitigations are needed, such as a stop work order if artifacts are discovered and a clear method for reporting concerns, filling complaints, and determining damages for noncompliance. The comment fails to acknowledge that MM CUL-1a and -1b would require a qualified professional archaeologist and approved Native American monitor be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological and/or tribal resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than 50 feet from the find. The Native American monitor and/or qualified archaeologist shall evaluate the significance of the discovery based on the Treatment

Plan prior to resuming any activities that could impact the discovery. All tribal cultural resources unearthed by ground disturbing activities shall be evaluated by the Native American monitor. Any required testing or data recovery shall be directed by the qualified archaeologist and Native American monitor pursuant to the Treatment Plan.

The comment also suggests that mitigation measures to address air quality impacts would conflict with the provisions required by unspecified cultural mitigations. However, the comment does not specify mitigation what mitigation measure would cause a conflict.

*Comment BW2-24*

The comment describes the provisions of CEQA under Section 15123, which require identification of areas of controversy known to the lead agency and a summary of the proposed actions and its consequences, including proposed mitigation measures. The EIR thoroughly discloses and discusses the areas of controversy known to BCHD in Section 1.8, *Areas of Known Public Controversy*. A summary of the EIR, including the determination of impacts and proposed mitigation measures is provided in the Executive Summary.

The comment incorrectly claims that the EIR discounted and never addressed the public concern regarding impacts. Contrary to this assertion, the summary provided in Section 1.8, *Areas of Known Public Controversy*, clearly complies with the intent of CEQA Guidelines Section 15123, which is referenced in the comment and states that *"[a]n EIR shall contain a brief summary of the proposed actions and its consequences."* The summary provides approximately 2 pages of bulleted issues that were known to be of concern during the preparation of the EIR. Additionally, as described in Section 1.8, *Areas of Known Public Controversy*, all comments letters received on the NOP were also provided as Appendix A to the EIR. Each of these comment letters was reviewed and marked up to identify individual environmental issues. Each of these issues was considered and responded to during the preparation of the environmental impact analysis provided in the EIR. The assertion that BCHD *"discounted the public controversy created by the Project and never addressed the concerns"* is unfounded.

## Letter BW3

June 4, 2021
Brian Wolfson
City of Torrance

*Comment BW3-1*

The comment provide an introduction to the following comments which assert why the Environmental Impact Report (EIR) is inadequate and incomplete and lacks sufficient mitigation. Detailed response to each of the discrete comments provided in this letter are presented in the following responses. It should be noted that the issues raised in Comment BW3-2 through BW3-4 were also raised and directly responded to in Comment TRAO-80.

*Comment BW3-2*

The comment incorrectly claims that the trip generation rates for the proposed Aquatic Center in Phase 2 were not completed by Fehr & Peers and that the analysis uses preliminary findings. As described in Section 3.14.3, *Impact Assessment and Methodology*, while the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition does describe trip generation estimates for gyms and fitness centers, it does not include trip generation estimates that are specific to aquatic centers. Therefore, Fehr & Peers used the results of the market feasibility analysis prepared by Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies, to estimate potential trip generation. Critical factors that were considered in developing the trip generation rates for the proposed Aquatic Center in Phase 2 included: the populations of the Beach Cities; the proportions of frequent, infrequent, and occasional swimmers, and the estimated market capture based on the size of the facility and the type of pool(s) that it would provide. The use of this market study by Fehr & Peers to develop trip generation rates for the proposed Aquatics Center in Phase 2 is entirely in keeping with ITE's recommendation to utilize local data where it is available. The methodology for the development of trip generation rates is described in detail in the Vehicle Miles Traveled Study (see Appendix K). The trip generation methodology is provided as Appendix A of the study and the Ballard*King & Associates Market Feasibility Evaluation is provided as Appendix C of the study.

*Comment BW3-3*

The comment states that the South Bay Aquatics Center was not used to develop aquatic center trip generation estimates because it had not been operating with regular class schedules due to the COVID-19 pandemic. This statement is correct, which led to the use of the market feasibility analysis prepared by Ballard*King & Associates to prepare the trip generation estimates (refer to Comment BW3-2).

It should be noted that while the comment attributes these statements in Appendix J to Ballard*King & Associates, the trip generation methodology presented in Appendix K and Appendix J was prepared by Fehr & Peers.

*Comment BW3-4*

The comment states that Ballard*King & Associates was directed to use the NGSA to approximate the number of people who might participate in recreational activities. First, it is important to note that the methodology employed by Ballard*King & Associates was not directed by BCHD or Fehr & Peers. The use of the NGSA participation statistics is common place for determining the market for recreation activities. NGSA has more than 35 years of experience providing such data, which can be used to *"to make educated decisions about participants, including market size and composition."*

Ballard*King & Associates took the national average and combines that with participation percentages of the Primary Service Area based upon age distribution (15.8 percent), median income (16.7 percent), region (17.9 percent), and national number (16.6 percent). As acknowledged in the comment, those percentages were then averaged together to create a unique participation percentage for the Primary Service Area (16.6 percent). This participation percentage, when applied to the population of the Primary Service Area, provided an estimate of the market potential for the proposed Aquatic Center. A Market Capture Rate of 3 percent was applied given the size limitations and operational budget of the facility. This Market Capture Rate was supported by Ballard*King & Associates previous work in the area, work across the country, and the presence of other providers. Similar market feasibility analyses have been prepared for countless sports facilities across California and across the Country.

The complete Aquatics Report, which is publicly available here: https://bchdcampus.org/sites/default/files/archive-files/Aquatics%20Report.pdf, thoroughly describes the applicability and use of the NSGA participation statistics in combination with local demographic data. With regard to local data sets requested by the comment, it should be noted that the Aquatics Report includes a robust local survey involving 2,256 responses that focused on the types of aquatic programs respondents were interested. This survey data contributed to and substantiated the use of the NGSA participation statistics and local demographic data.

It should also be noted that Fehr & Peers prepared trip generation estimates by building on the results of the market feasibility study. Fehr & Peers assigned vehicle occupancy factors (e.g., 1 person per vehicle for frequent swimmers as compared to 3 persons per vehicle for occasional swimmers that are likely to include families). Fehr & Peers also considered anticipated programming for the proposed Aquatics Center (e.g., hydrotherapy) to identify shared uses related to the CHF and the proposed Assisted Living program. Together these were used to develop trip generation estimates specific to the proposed Project.

The Vehicle Miles Traveled Study does not hide that these are trip generation estimates. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed via feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. The trip generation estimates for all uses associated with the proposed Project are consistent with ITE recommendations and each of the cities guidelines for preparing transportation studies. This clearly meets the requirement of CEQA Guidelines Section 15003(i), which states *"CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure."*

Therefore, contrary to the assertion of the comment, the trip generation estimates for the developed for the proposed Aquatics Center were appropriate for estimating mobile source GHG emissions associated with the facility.

**Letter CP**

June 10, 2021
Carl Paquette
5656 Towers Street
Torrance, CA 90503

*Comment CP-1*

The comment expresses general opposition to the proposed driveway(s) on Flagler Lane. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment CP-2*

The comment generally remarks that there are many findings of less than significant impacts, but that these impacts add up. However, the comment does not provide any specific challenge to the thresholds, methodologies, or conclusions of the environmental impact analysis provided in the EIR to further clarify this issue. Project specific impacts and cumulative impacts have been analyzed in great detail within the Environmental Impact Report (EIR) in accordance with the requirements of CEQA. The EIR rigorously adheres to the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative

investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

*Comment CP-3*

The comment expresses general issues related to population growth and traffic associated with employees. However, the comment fails to acknowledge the detailed discussion of these issues in Section 3.12, *Population and Housing* and Section 3.14, *Transportation*. The comment provides no substantial evidence or expert opinion contesting the thresholds, methodologies, or conclusions of these analyses.

*Comment CP-4*

The comment asserts, again without substantial evidence or expert opinion, that the height of the proposed height of structures, impacts from shade/shadows, obstruction of wind and coastal breezes, and obstruction of views. The EIR thoroughly assesses the impacts associated with aesthetics and visual resources that could result from construction and operation of the proposed Project in Section 3.1, *Aesthetics and Visual Resources*. As described therein, the analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x for the Phase 1 preliminary site development plan. Additionally, the analysis addresses representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. These photosimulations and representative views were reviewed in the context of CEQA as well as the relevant development standards and sections of the Redondo Beach Municipal Code (RBMC) and the Torrance Municipal Code (TMC). Additionally, shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M). The comment provides no substantial evidence or expert opinion contesting the thresholds, methodologies, or conclusions of these analyses. Similarly, the comment does not provide any supporting information to substantiate the assertion that a single development would disrupt regional offshore and onshore wind patterns.

## Letter CR

June 9, 2021
Cecilia Raju

*Comment CR-1*

The comment expresses general issues regarding the potential impacts on air quality. For example, the comment asserts, without substantial evidence or expert opinion, that given the size and depth

of excavation, the potential for soil contaminants is unknown. However, the comment fails to acknowledge the detailed review of this issue in Section 3.8, *Hazards and Hazardous Materials*, supported by the Phase I and Phase II Environmental Site Assessment (ESAs) as well as various follow-up investigations.

The comment notes the requirement for Mitigation Measure (MM) AQ-1 but suggests that the Beach Cities Health District (BCHD) could simply overlook or not follow through with the mitigation measures. However, as described in Master Response 10 – Air Quality Analysis, the California Environmental Quality Act (CEQA) Guidelines provide that "*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified it Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the South Coast Air Quality Management District (SCAQMD). Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

In summary issues related to hazardous materials and air emissions are addressed in detail within the EIR and are supported by detailed technical analysis. The comment does not provide any substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of these analyses.

*Comment CR-2*

The comment expresses general concerns regarding increased noise levels associated with the proposed Project. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction noise. Temporary, but prolonged construction-related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. The comment does not challenge the thresholds, methodology, or the results of the exhaustive quantitative noise modeling provided in the EIR. As described in Impact NOI-1, it should also be noted that Towers Elementary School would not experience significant construction-related noise impacts (refer to Table 3.11-16 and Table 3.11-17).

*Comment CR-3*

The comment asserts, without substantial evidence or expert opinion, that congestion will result from the implementation of the proposed Project. Section 3.14, *Transportation* clearly addresses and provides a detailed quantification of potential impacts to transportation as a result of construction and operation of the proposed Project.

As discussed in Master Response 13 – Transportation Analysis, increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and potentially slow traffic movement. In addition, frequent haul truck traffic entering and exiting the driveways along North Prospect Avenue and Beryl Street could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, through temporary closure of bicycle lanes or sidewalks. Other potential construction-related impacts include idling, parked, or queued haul trucks that could potentially obstruct visibility. As a result, construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity are identified in this EIR as potentially significant impacts. To avoid construction-related safety hazards, the preparation and implementation of a Construction Traffic and Access Management Plan required under MM T-2 would address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*.

With regard to operational transportation impacts, it should be noted that it should be noted that changes in State law now require that CEQA analysis be based on vehicle miles traveled (VMT) by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing level of service (LOS) by measuring intersection congestion and roadway capacity. This reflects State policy goals to reduce vehicle energy use, particularly energy use associated with non-renewable fossil fuels, and associated greenhouse gas (GHG) emissions and their adverse effects on global climate change. Nevertheless, at the request of the City of Redondo Beach and

the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and intersted residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

The comment does not provide any substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of these analyses.

*Comment CR-4*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter CG

June 10, 2021
Charlene Gilbert

*Comment CG-1*

The comment states that residences along the Diamond Street cul-de-sac were omitted from the EIR, resulting in failure to mention or analyze impacts of aesthetics and visual resources on these residences. However, the EIR includes detailed consideration and analysis of Project impacts to aesthetics, views, light and glare, and shade/shadow issues in Section 3.1, *Aesthetics and Visual Resources*. See also Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding impacts associated with aesthetics and visual resources.

The comment further states that the EIR's description of the southeast border does not mention the Diamond Street cul-de-sac and includes photo and written description of a different section of Diamond Street opposite the Project site. The comment also states that the EIR inaccurately describes there being several schools on Diamond Street. However, as demonstrated by the discussion in Section 2.2.2, *Surrounding Land Uses*, and depicted in Figure 2-2, the EIR clearly includes written description of Diamond Street residences located immediately southeast of the Project site. Nevertheless, additional discussion has been added to Section 3.1, Aesthetics and Visual Resources, to include specific reference to the Diamond Street cul-de-sac. With regard to the EIR's description of schools along Diamond Street, the discussion in the EIR has been revised to correctly reference the Redondo Union High School as being the only school located along Diamond Street.

*Comment CG-2*

The comment asserts that there is nothing in Section 3.1, *Aesthetics and Visual Resources*, to show the impact on residences of the Diamond Street cul-de-sac. The EIR thoroughly assesses the impacts associated with aesthetics and visual resources that could result from construction and operation of the proposed Project in Section 3.1, Aesthetics and Visual Resources. As described therein, the analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x, professional architects and visual simulation specialists, for the Phase 1 preliminary site development plan. The selection of the representative views was based upon those locations from which the Project site – namely the proposed Phase 1 and Phase 2 improvements – would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. Given the proposed Phase 1 development plan would not result in major new development along the southeast portion of the Project site (with the exception of the electrical and gas yard), separate photosimulations depicting the change in views from the Diamond Street cul-de-sac where not included, as views would largely remain the same. Regarding views of the Project site from the Diamond Street cul-de-sac following completion of the Phase 2 development program, the EIR analysis addresses representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. Included in this analysis is a representative view from Diamond Street, just 150 feet southwest of residences of the Diamond Street cul-de-sac. This representative view is used to inform the analysis of Project impacts on views from the Diamond Street cul-de-sac, and inclusion of a new representative view directly from residences of the Diamon Street cul-de-sac is not necessary, nor would it better inform impacts of the Project on aesthetics and visual resources.

See also response to Comment AW-9 for detailed response to request for provision of additional representative views and consultation with the City of Torrance. As described in Comment Response AW-9, CEQA Guidelines Section 15151 states that *"[a]n evaluation of environmental effects of a proposed project need not be exhaustive…"* This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide *"a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations"* (CEQA Guidelines Section 15151).

*Comment CG-3*

The comment states that the green buffer which interrupts views of existing development at the Project site from residences of the Diamond Street cul-de-sac is not discussed in Section 3.1, Aesthetics and Visual Resources. A brief description of this feature has been added to the discussion of views from Diamond Street in Section 3.1.1, *Environmental Setting*.

*Comment CG-4*

The comment states that representative views do not include views from the Diamond Street cul-de-sac and again states that EIR fails to mention residences directly adjacent to the Project site along the Diamond Street cul-de-sac. Please refer to response to Comments CG-1 and CG-2 above for detailed discussion and response to these concerns.

*Comment CG-5*

The comment asserts that the EIR fails to define the Diamond Street cul-de-sac as being on the southeastern border of the Project site and lacks consideration of impacts and mitigation of views from these residences. Please refer to response to Comments CG-1 and CG-2 above for detailed discussion and response to these concerns.

*Comment CG-6*

The comment asserts that the EIR lacks detail regarding the Southern California Edison (SCE) Substation, its impact on the green buffer which consists of existing trees on-site which help to obstruct views of the Project site from residences of the Diamond Street cul-de-sac, and mitigation for restoration of this green buffer. Please refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the Project's impact on aesthetics and visual resources, as well as plans for replanting of the green buffer.

*Comment CG-7*

The comment expresses concern regarding potential adverse health effects from the proposed Substation on the residences of the Diamond Street cul-de-sac. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for detailed discussion and response to concerns regarding the proposed substation.

*Comment CG-8*

The comment asserts that the EIR does not address or offer mitigation of noise impacts resulting from the loss of trees along the Project's southeastern boundary within the green buffer, nor does it include consideration of impacts from the proposed substation. Please refer to Master Response 12 – Credibility/Sufficiency of Noise Analysis for detailed discussion and response to concerns regarding the EIR's analysis of noise impacts, including consideration of noise generated by the proposed substation.

*Comment CG-9*

The comment asserts that impacts resulting from light pollution generated by the proposed Project on residents of the Diamond Street cul-de-sac are not properly addressed. Please refer to response to Comment CG-1 above.

*Comment CG-10*

The comment incorrectly asserts the EIR does not account for existing hazardous material on site, soil contamination from the former dry cleaners, or acknowledge runoff or construction-related fugitive dust emissions. Polluted stormwater runoff is discussed in Section 3.9, Hydrology and Water Quality. As described in Section 3.8, Hazards and Hazardous Materials and summarized in BCHD Master Response 11 - Hazards and Hazardous Materials Analysis, the prepared Phase I ESA identified potential sources of contamination including the former dry cleaner located within the Redondo Village Shopping Center. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of these ESAs, the EIR describes compliance with applicable regulations and standards, best management practices, and mitigation measures to address these conditions and ensure Project impacts would be less than significant. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for further detailed discussion and response to these concerns.

As described in Section 3.2, *Air Quality* and summarized in Master Comment Response 10 – Air Quality Analysis, the analysis of construction of the proposed Project considers the impacts of fugitive dust (i.e., $PM_{10}$) emissions. Section 3.2.4, Projects Impacts and Mitigation Measures under

Impact AQ-2, the EIR describes mitigation measures that would reduce fugitive dust emissions to less than significant. Refer to Master Response 10 – Air Quality Analysis for further detail.

*Comment CG-11*

The comment reiterates concerns in the above Comment CG-10 regarding analysis of impacts to biological resources from potential toxic waters and mud runoff. Please refer to response to Comment CG-10 above for detailed discussion and response to these concerns. As it relates to biological resources, those sections referenced in the above response address impacts and mitigation relevant to each of these issues and which would by effect, address potential impacts to downstream biological resources.

*Comment CG-12*

The comment again asserts that the residences located in the Diamond Street cul-de-sac area were not defined as being on the southeast border of the Project site not included in the EIR, and the analysis of impacts on these residences is incomplete. Please refer to responses to Comments CG-1 through CG-11 above for detailed discussion and response to stated concerns regarding consideration and analysis of impacts on the Diamond Street cul-de-sac residences.

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**Letter CI**

June 6, 2021
Chiaki Imai

*Comment CI-1*

The comment expresses general opposition to the proposed Project and citing construction noise impacts on nearby sensitive receptors. It should be clarified that while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to concerns regarding the temporary, but prolonged construction noise impacts on nearby sensitive receptors. The comment does not provide any substantial evidence or expert opinion regarding excessive stress. However, it should also be noted that while other commenters have provided articles, studies, and literature reviews (e.g., refer to the responses to Letter TRAO, FL1, and FL2) they generally show no clear connection to the proposed Project or the environmental impact analysis in the EIR.

*Comment CI-2*

The comment claims that contaminated air and dust will enter the homes of nearby residents. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments potential air quality impacts on sensitive receptors. The comment provides no substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of the exhaustive air emissions modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

*Comment CI-3*

The comment expresses concerns, without substantial evidence or expert opinion, regarding construction-related traffic safety impacts on the surrounding roadways. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to concerns regarding construction-related traffic impacts and safety.

*Comment CI-4*

The comment states that the building is huge and does not fit within the neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding potential impacts on aesthetics and visual resources. The comment provides no substantial evidence or expert opinion that challenges the impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*, which is supported by photographs, computer-generated photosimulations, and a shade and shadow analysis.

*Comment CI-5*

The comment expresses general opposition to the proposed Project, claiming that it would only benefit those who can afford the cost of the Assisted Living program or Memory Care Community. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care for detailed discussion and response to comments regarding the affordability of senior care facilities. While not relevant to the adequacy of the EIR, it should be noted that BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services.

## Letter CK

Chikako Kashino

509 Cluster Lane
Redondo Beach, CA 90278

*Comment CK-1*

The comment expresses general opposition to the proposed Project, citing construction-related noise impacts as well as perceived construction-related pollution and traffic impacts. Each of these issues is addressed in detail in the Environmental Impact Report (EIR) within Section 3.11, *Noise* as well as Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, and Section 3.14, *Transportation*. The comment provides no substantial evidence or expert opinion that challenges these impact analyses.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter CKS**

Chris and Kristy Sullivan
5013 Deelane St.
Torrance, 90503

*Comment CKS-1*

The comment notes that there are 11 schools within 0.5 miles of the Project site. The comment goes on to state that these schools as well as nearby residents in the City of Torrance are particularly susceptible to construction-related air quality impacts. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments pertaining to air quality impacts and the potential effects on nearby sensitive receptors. The comment provides no substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of the exhaustive air emissions modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

The comment also asserts that asbestos and other hazardous building materials could affect nearby sensitive receptors. However, the comment fails to acknowledge that this issue is addressed in detail in Section 3.8, *Hazards and Hazardous Materials*. as required by Mitigation Measure (MM) HAZ-1, surveys for asbestos-containing materials (ACM), lead-based paint (LBP), and polychlorinated biphenyls (PCBs), and molds would be conducted by a licensed consultant(s) prior to and during the demolition activities. If such hazardous materials are found to be present, the

licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and mold to ensure public safety, such as sealing off an area sealing off an area with plastic and filtering the affected air to ensure that no asbestos fibers are let out into the surrounding environment. Therefore, implementation of mitigation measure MM HAZ-1 and compliance with existing mandatory regulations and abatement procedures for the treatment, handling, and disposal of ACM, LBP, PCBs and mold, would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby schools and residences.

*Comment CKS-2*

The comment expresses concern regarding construction-related noise impacts on nearby schools and the indoor learning environment. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding impacts from noise. First, it is important to note that while the Environmental Impact Report (EIR) finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east, exterior noise levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Therefore, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA.

*Comment CKS-3*

The comment expresses concern regarding potential impacts on transportation and traffic, noting existing back-ups particularly during school dismissal and peak hour periods. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to comments

regarding potential construction-related and operational transportation. The comment provides no substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions in the transportation studies prepared by Fehr & Peers a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay.

*Comment CKS-4*

The comment expresses general opposition to the proposed Project, asserting the commenter's opinion that the massive building does not fit in with the community that it surrounds.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter CT**

April 22, 2021
Chris Tuxford

*Comment CT-1*

The comment expresses general opposition to the Project, asserting that there is a lack of need for the proposed Project. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the need for the proposed Project.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter CO**

May 26, 2021
Colleen Ota

*Comment CO-1*

The comment expresses general support for the proposed Project, but recommends that the height of the proposed buildings be limited to 4 stories. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

It should be noted that the proposed development has been sized to provide adequate square footage to support the proposed uses and to meet the project objectives related to revenue generation. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. Nevertheless, as described in Redondo Beach Municipal Code (RBMC) Section 10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district are subject to Planning Commission Design Review. The comment cities RBMC Section 10-2.2502, which guides the Planning Commission Design Review. As described in Section 3.1, *Aesthetics and Visual Resources* and Section 3.10, *Land Use and Planning*, the Planning Commission Design Review could further revise the proposed Project (e.g., limit FAR, building height, setbacks, etc.); however, the EIR appropriately defines and analyzes the maximum disturbance envelope pursuant to the requirements of California Environmental Quality Act (CEQA).

**Letter CC**

March 10, 2021
Dr. Conna Condon

*Comment CC-1*

The comment expresses general opposition to the proposed Project asserting that the proposed Assisted Living units would not be affordable and that the Environmental Impact Report (EIR) underestimates traffic. However, the comment does not provide any substantial evidence or expert opinion to substantiate these assertions. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a response to comments pertaining to the affordability of the proposed Assisted Living units. Additionally, refer to Master Response 13 – Transportation Analysis for a detailed discussion regarding the transportation analysis provided in Section 3.14, *Transportation*, supported by studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay.

*Comment CC-2*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter DR**

April 28, 2021
Dan Rogers

*Comment DR-1*

The comment asserts that the proposed Project would severely impact traffic and congestion. Refer to Master Response 13 – Transportation Analysis for a detailed discussion regarding the transportation analysis provided in Section 3.14, *Transportation*, supported by studies prepared by Fehr & Peers. The comment provides no substantial evidence or expert opinion challenging the thresholds, methodology, and findings of these studies.

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter DG**

June 8, 2021
Dana Grollman

*Comment DG-1*

The comment asserts, without substantial evidence or expert opinion, that the scope and height of proposed buildings would dramatically change the views for residents in the area and affect their resale value. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding potential impacts on public views. With regard to comments property and/or resale values, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potentially significant adverse physical effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this Environmental Impact Report (EIR) as required by CEQA.

*Comment DG-2*

The comment expresses general concerns regarding the proposed Phase 2 parking structure including how it would look and the traffic impacts it would cause. The comment does not provide any substantial evidence to further clarify these concerns. Each of these issues is addressed in detail within the EIR. For instance, the analysis of aesthetics and visual resources impacts in Section 3.1, *Aesthetics and Visual Resources,* provides visual renderings for three separate Phase 2 example site plan scenarios for illustrative purposes and to help inform the program analysis. Additionally, as discussed in the response to FL1-12, while no longer a CEQA issue pursuant to Senate Bill (SB) 743 and CEQA Guidelines 15064.3, the construction of the proposed parking structure in Phase 2 would not result in substantial increases in volume-to-capacity (V/C) ratios or vehicle delays at any of the three existing driveways along North Prospect Avenue or the intersection of North Prospect Avenue & Diamond Street (refer to Appendix M). This is because vehicles would travel to and from the Project site throughout the day and would not be concentrated around the peak hours. In fact, even with the implementation of Phase 2, there would still be a minor reduction in AM and PM peak hour vehicle trips. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to trip generation associated with the proposed Project.

*Comment DG-3*

The comment expresses general concern regarding construction-related impacts on traffic at the corner of Flagler Lane & Beryl Street, particularly when school is in session. Refer to Master Response 13 – Transportation Analysis as well as the response to Comment KB-3, which provide a detailed discussion related to construction-related traffic. The comment provides no substantial evidence or expert opinion challenging the analysis of construction-related traffic provided in Section 3.14, *Transportation* under Impact T-3.

*Comment DG-4*

The comment expresses general concern regarding construction-related noise impacts. This issue is addressed in detail with Section 3.11, *Noise*, with analysis supported by detailed quantitative noise modeling. Temporary, but prolonged construction-related noise impacts are identified for sensitive receptors located on-site and immediately adjacent to the Project site. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding noise impacts. The comment provides no substantial evidence or expert opinion that challenges the thresholds, methodology, or results of the exhaustive quantitative noise modeling effort.

*Comment DG-5*

The comment expresses general concern regarding soil contamination. As described in Master Response 11 – Hazards and Hazardous Materials Analysis, this issue is address in detail in Section 3.8, *Hazards and Hazardous Materials*, with analysis supported by the Phase I and Phase II Environmental Site Assessment (ESAs) and additional follow-up investigations. This comment provides no substantial evidence or expert opinion challenging this analysis or the required mitigation measures to reduce associated risks to a less than significant level.

*Comment DG-6*

The comment expresses general concern regarding the perception that BCHD is gifting a lease to an Assisted Living program to be operated by a third party for residents located outside of the Beach Cities. It should be noted that the proposed Project would not gift public land to private developers, rather the BCHD would use revenues generated from the proposed Project to re-invest in and continue community health and wellness programming and services in alignment with the mission of BCHD. As described in Section 2.3, *Existing Tenants* BCHD currently uses a similar revenue generation model providing leased space for a variety of mission-oriented tenants. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The market

study prepared by MDS Research Company, Inc. identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area.

*Comment DG-7*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter DF**

June 10, 2021
Dean Francois

*Comment DF-1*

The comment provides a general overview of numerous issues discussed further in Comments DF-2 through DF-6.

The comment expresses general concerns regarding the analysis of air quality, energy, biological resources, and greenhouse gas (GHG) emissions, without providing any specific details regarding how or why the Environmental Impact Report (EIR) does not adequately discuss or characterize impacts related to these resources. Contrary to the assertions in this comment, the EIR rigorously adheres to the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151.

The comment asserts that the EIR failed to adequately consider alternatives to retrofit the existing building. However, it should be noted Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space* does explore a seismic retrofit – funded by a local bond measure. Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. The Beach Cities Health District (BCHD) would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would

implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

The comment asserts that typically public input on an EIR is provided to a public agency. The comment claims that it is a highly unusual relationship for BCHD to certify its own EIR. However, contrary to this comment, local jurisdictions regularly certify EIRs for their own capital improvement projects and long-range plans. For example, cities and counties are responsible for preparing CEQA-compliant documentation for their own general plans, specific plans, etc. Nearly all cities and counties within the State are currently preparing CEQA-compliant documentation, as lead agencies, for updates to their Housing Elements. For additional detailed discussion and a response to comments pertaining to BCHD's role as the lead agency, refer to Master Response 2 – BCHD as Lead Agency.

The comment asserts that BCHD has strayed far beyond its mission and claims that the proposed Project is a gift of public lands. It should be noted that the proposed Project would not gift public land to private developers, rather the BCHD would use revenues generated from the proposed Project to re-invest in and continue community health and wellness programming and services in alignment with the mission of BCHD. As described in Section 2.3, *Existing Tenants*, BCHD currently uses a similar revenue generation model providing leased space for a variety of mission-oriented tenants.

*Comment DF-2*

The comment states that the main purpose of the proposed Healthy Living Campus Master Plan is to generate revenue so that BCHD can fund community health and wellness programs and services, but that proposed Project may conflict with this purpose given the proposed public/private partnerships. However, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would continue this model. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community. The comment asserts that there are additional alternatives that could generate additional revenue, but does not provide any specific details regarding such an alternative.

*Comment DF-3*

The comment asserts that the EIR is faulty because it provides no financial information regarding the escalating maintenance costs. The comment claims that the EIR has incorrectly eliminated the

interior renovation of the Beach Cities Health Center as an alternative due to financial infeasibility. CEQA Guidelines states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to do so if the information *"does not supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis* describes that the interior upgrade of the Beach Cities Health District would address existing maintenance issues (e.g., outdated electrical and plumbing systems) and would provide space configurations that would be better suited for potential tenants. However, the upgrade would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. Upgrades to water lines, electrical lines, and natural gas lines as well as relocation of interior walls and refinishing would all require substantial interior construction work. Not only would this alternative not meet the project objectives to proactively address seismic safety issues and to provide additional open space, but the financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. This issue has been discussed at length as a part of the need for the proposed Project at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings.

*Comment DF-4*

The comment restates the assertion that the proposed Project would conflict with the project objective of generating sufficient revenue to address community health needs. The comment claims that the project objectives are too restrictive and limit the ability to select better alternatives that meet the mission of BCHD. Refer to the response to Comment DF-2 for detailed discussion and response to these concerns.

*Comment DF-5*

The comment asserts that the EIR is faulty because the Upgrade to Beach Cities Health Center (No Seismic Retrofit) Alternative was considered and discarded from further analysis. The comment claims that the analysis of rental income is lacking and that the BCHD would have little to no control to achieve the stated project objective of generating revenue to provide community health

and wellness programs and services. With regard to analysis of rental income and ability for BCHD to achieve Project objectives, refer to the response to Comment DF-3 as well as Master Comment 6 – Financial Feasibility/Assurances.

As discussed in Section 5.4, *Alternatives Considered but Rejected from Further Analysis* the Beach Cities Health Center would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. The financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. Therefore, this alternative would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD, and was discarded from further consideration. It should also be noted that this alternative would not address potential seismic safety issues or provide open space within the campus. This discussion provides sufficient information and explanation as to why this alternative would not generate enough financial resources necessary to meet the basic objectives of the Project. CEQA Guidelines Section 15126.6(c) states that

> *"The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."*

*Comment DF-6*

The comment asserts that the EIR fails to analyze an accurate No Project Alternative, which considers leaving the buildings intact, and incorrectly justifies that demolition of existing structures would have to occur since buildings would deteriorate or fail to meet seismic specifications. This issue is also addressed in the response to Comment TRAO-86. For context, pursuant to CEQA Guidelines Section 15126.6(e)(1), *"[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project."* Pursuant to CEQA Guidelines Section 15126.6(e)(2), *"[t]he 'no project' analysis shall discuss the existing conditions*

*at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."*

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is "*reasonably expected to occur in the foreseeable future"* clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission

as a California Healthcare District and substantially reducing public health service available to Beach Cities residents and even those of the South Bay. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed.

*Comment DF-7*

The comment asserts that a complete analysis should be performed for both a remodel alternative as well as a remodel and retrofit alternative. However, as discussed in the responses to Comment DF-2 through DF-6, the EIR need not be revised to carry forward a remodel alternative given that it would not meet the basic project objectives. Additionally, the No Project Alternative sufficiently describes what is reasonably expected to occur in the foreseeable future consistent with the requirements of CEQA Guidelines Section 15126.6(e).

**Letter DV**

June 10, 2021
Delia Vechi

*Comment DV-1*

The comment states that the Environmental Impact Report (EIR) should disclose any conflict of interest that individuals may have between the Beach Cities Health District (BCHD) and Wood Environment & Infrastructure Solutions, Inc. (Wood) and its subconsultants. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in California Environmental Quality Act (CEQA) Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

*Comment DV-2*

The comment provides support for other comments opposing the EIR and/or the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment DV-3*

The comment states that the EIR has ignored the fact that the existing buildings can be retrofitted. As described in Master Response 3 – Project Need and Benefit, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the *Beach Cities Health District Seismic Assessment* and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). These buildings were designed and constructed in conformance with building code requirements at the time of construction; however, the building code requirements have since evolved substantially based on research, best practices, and experience from previous earthquakes. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

The EIR acknowledges that the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission (refer to Section 2.4.2, *Project Background*). Revenues from the long-term tenant leases support BCHD community health programs and services, such as the Community Services program, the Center for Health and Fitness (CHF), and the Beach Cities Partnership for Youth. However, BCHD's ability to attract tenants has diminished in recent years, in part because of the specialized nature of the former South Bay Hospital Building, which cannot be easily renovated to conform to tenant needs. Therefore, even if simply seismically retrofitting the Beach Cities Health Center were financially feasible, it would not address these additional issues associated with providing purpose-built facilities for outpatient medical services and other community health and wellness needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and

renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible.

*Comment DV-4*

The comment states that the justification for the proposed Project is to avoid bankruptcy. Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to the need for the proposed Project. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD community health and wellness services for both residents of the Beach Cities living and many interested residents from the South Bay. As such, the proposed development must replace revenue to support the current level of existing community health and wellness programs and services as well as generate new revenues to fund the growing future community needs.

*Comment DV-5*

The comment asserts that the underlying purpose of the proposed Project is to develop the proposed Residential Care for the Elderly (RCFE) Building, despite purported conflicts for such with existing site zoning designations. The comment also claims that the proposed Programmatic All-Inclusive Care for the Elderly (PACE) should not be included as part of the Project because the Beach Cities are already served by the LA Coast PACE. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to concerns pertaining to the need for each element of the proposed Project. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a response to comments pertaining to land use compatibility associated with the proposed Assisted Living program and Memory Care community. As described therein, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted on P-CF zones with a conditional use permit (CUP). Additionally, contrary to the assertion of the comment, the National PACE Association website shows that there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located within any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

*Comment DV-6*

The comment states that the proposed Phase 2 development program must be included as the first phase of the proposed Project as it more fully aligns with BCHD's mission, but the Phase 2 development program is less defined and not clear when or if the program will be built. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion and response to concerns regarding certainty of the Phase 2 development program. As described in Section 2.0, *Project Description*, the Phase 2 development program would be implemented at least 5 years after the development under Phase 1 and the programming in Phase 2 and the associated development is intended to respond to the Community Health Report and priority-based budgeting efforts to meet constantly evolving community health and wellness needs in the Beach Cities and the nearby South Bay communities. As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan. This approach is often used by lead agencies – including local municipalities – when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans existing for later improvements.

*Comment DV-7*

The comment asserts that the proposed RCFE Building is not consistent with the P-CF (Community Facility) zoning of the existing campus. Refer to the response to Comment DV-5 as well as Master Response 7 – Project Compatibility with P-CF Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

*Comment DV-8*

The comment correctly states that the vacant Flagler Lot is zoned as C-2 (Commercial) and that a portion of the Project site is located within City of Torrance right-of-way. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way, which are relatively minor components of the proposed Project, would require permits issued by the City of Torrance. However, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the campus beyond the municipal boundaries.

The comment states that the vacant Flagler Lot was previously used for oil and gas activities, with petroleum pumps working on-site for year. The comment claims that BCHD has not disclosed

whether the condition of the soil or otherwise described who would take responsibility if something is wrong with the existing wells. As described in Master Response 11 – Hazards and Hazardous Materials Analysis, issues related to the previously plugged and abandoned oil and gas well are addressed in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-2. As described therein, Total Petroleum Hydrocarbons (TPH) in the heavy oil range were detected in two samples at boring locations within the vacant Flagler Lot. These concentrations are most likely related to the previously plugged and abandoned oil and gas well; however, they are well below the Department of Toxic Substances Control (DTSC) and U.S. Environmental Protection Agency (USEPA residential screening level and do not represent a potential hazard to the environment or public health. Terra-Petra Environmental Engineering (Terra-Petra) excavated the well to physically locate it and complete a leak test, which was negative (i.e., no leaks were detected). Terra-Petra has prepared a summary report, which has since been shared with California Geologic Energy Management Division (CalGEM), the responsible oversight agency. Pursuant to Mitigation Measure (MM) HAZ-3, BCHD has enrolled into the CalGEM Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

*Comment DV-9*

The comment asserts that the EIR does not fully address hazards generated by the former dry cleaner within the Redondo Village Shopping Center directly north of the Project site. Refer to Master Response 8 – Hazards and Hazardous Materials Analysis for detailed discussion and response to comments pertaining to the potential impacts associated with tetrachloroethylene (PCE). The comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to

Section 3.8, *Hazards and Hazardous Materials*). With the implementation of the mitigation measures identified in the EIR (i.e., MM HAZ-2a through -2d) impacts associated with PCE would be less than significant. Implementation of these measures would ensure appropriate handling of soils on-site.

As described in Section 3.8.1, *Environmental Setting*, BCHD has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the Certified Unified Program Agency (CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup. Although previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the campus have not experienced vapor intrusion form subsurface contamination, development would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatized PCE through carbon filters before outgassing the vapor at a controlled rate. Because PCE is generally only hazardous when encountered in a confined space, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

*Comment DV-10*

The comment asserts that the RCFE does not belong on the BCHD due to its purported incompatibility with the P-CF zoning designation and its purported conflict with BCHD's mission. The comment further asserts that the EIR does not address complaints regarding increased

ambulance noise that will result from implementation of the RCFE. Refer to the response to Comment DV-5 as well as Master Response 7 – Project Compatibility with P-CF Land-Use Designation for detailed discussion and response to comments pertaining to this issue. Additionally, refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments regarding the need for the proposed Project, including the Assisted Living program, Memory Care community, PACE, and other community health and wellness facilities, programs, and services.

With regard to the analysis of impacts from operational ambulance noise, refer to Master Response 12 – Noise Analysis. The noise analysis presented in the EIR includes detailed discussion and analysis of impacts associated with operation of the proposed Project. Despite the commenter's assertions, this analysis does in fact include a detailed analysis of emergency vehicle noises. For instance, the analysis considers the potential increase in total number of individuals requiring ambulance services and the associated number of ambulance calls associated with this number based on average annual calls per bed space per year. While it is noted that these responses would be sporadic and not always require the use of sirens, as a majority of these calls are related to medical situations that do not always require an emergency responses, the analysis includes discussion of the typical noise impacts that increased medical response would generate when sirens are utilized (approximately 100 dBA at 100 feet, and between 91 and 100 dBA at receptors along North Prospect Avenue and Beryl Street). In such a case, associated noise impacts are not considered significant given the infrequent and short duration of siren utilization (duration of exposure to peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic).

*Comment DV-11*

The comment questions the need for the proposed RCFE Building and suggests that new approach include decentralized, which use the outdoor environment and smaller decentralized spaces. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the need for the proposed Project. The matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, this need for the proposed Project has been discussed in detail at numerous well-noticed public hearings. It should also be noted that the proposed Project includes PACE services allowing participants to remain in their homes in the community. Additionally, the proposed Project includes 2.45 acres of programmable open space that would be accessible to the public and also available for use by the proposed Assisted Living facility, PACE services, etc.

## Letter DH1

June 10, 2021
Diane Hayashi

*Comment DH1-1*

The comment asserts, without substantial evidence, that the proposed Residential Care for the Elderly (RCFE) Building would be incompatible with surrounding neighborhoods, citing the size and placement of the building near the perimeter of the Project site. The comment also asserts that the proposed RCFE Building would be incompatible with Redondo Beach and Torrance general plan policies and municipal codes. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding potential impacts associated with aesthetics and visual resources, including height and size of the proposed RCFE Building, access to skyline views, compatibility with the surrounding neighborhood, shade and shadow effects, and privacy concerns. The impact analysis included in Section 3.1, *Aesthetics and Visual Resources* is informed by photosimulations prepared by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, as well as renderings of the development under Phase 2 and a detailed shade and shadow analysis. The comment does not challenge any specific aspect of the policy consistency analysis described under Impact VIS-2. As such, the assertion that the proposed Project was permanently ruin the surrounding neighborhood and the South Bay is wholly unsupported.

*Comment DH1-2*

The comment requests that the EIR address violations with City of Torrance General Plan Policy LU.2.1 and Policy LU.3.1, and City of Redondo Beach General Plan Policy 1.46.4. However, the comment does not provide any further detail regarding how or why the proposed Project violates these policies. Consistency with applicable policies of the City of Redondo Beach and City of Torrance General Plans is presented and analyzed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5. As presented therein, the proposed Project would not present any conflict with either of these three policies. Specific issues related to Redondo Beach General Plan Policy 1.46.4 as well as Torrance General Plan Policy LU.2.1 and LU.3.1 are also addressed in the response to Comment TRAO-19 and Comment AN6-2.

**Letter DH2**

June 10, 2021
Diane Hayashi

*Comment DH2-1*

The comment asserts that the analysis of operational noise levels for anticipated events on-site was not sufficiently discussed or analyzed in the Environmental Impact Report (EIR). However, the comment does not provide any substantial evidence or expert opinion describing how or why the analysis of operational noise levels provided under Impact NOI-3 is deficient.

The comment further states, again without any substantial evidence or expert opinion, that the analysis of noise is deficient due to the use of modeled average noise and not intermittent noise. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to comments pertaining to construction and operational noise impacts. This response to comments provides a detailed explanation of the Federal Transit Authority (FTA) thresholds as well as the noise metrics that were used in the impact analysis. This issue is also addressed in the response to Comment AW-30.

The comment incorrectly asserts that the effects of noise disruptions as well as ground vibrations were never studied. Potential impacts associated with ground-borne vibration were clearly described under Impact NOI-2. The comment does not challenge any specific thresholds, methodologies, or conclusions of this impact analysis, which is supported by extensive quantitative modeling.

The comment claims that viable noise mitigation was not considered, such as setback of the structure and a reduction in building heights. However, the comment fails to acknowledge the site planning constraints associated with the existing Beach Cities Health Center. Additionally, the requested reduction in height to 30 feet would not provide sufficient space within the RCFE Building or the other structures proposed under the Phase 2 development program to meet the project objectives. Refer to Master Response 12 –Noise Analysis for additional detailed discussion and response to comments pertaining to construction related noise issues and mitigation measures. This issue is also addressed in the response to Comment AW-15 and AW-31.

## Letter EA

June 10, 2021
Ed Arnn

*Comment EA-1*

The comment states that there are many inconsistencies between the text, summary tables, and graphics in the Environmental Impact Report (EIR). However, the comment fails to provide further details describing in what way the EIR inconsistent.

*Comment EA-2*

The comment highlights several issue areas identified during the scoping process that are of interest to the commenter and are discussed in the EIR, but asserts that several other issues were ignored. In particular, the commenter asserts that the discussion hazards and noise impacts resulting from construction truck traffic along the Beryl Street outbound haul route could not be located in the EIR.

The EIR provides detailed discussion of issues identified by the public during the scoping process, including aesthetics and visual resources, air quality, hazards and hazardous materials, noise, and traffic from both construction and operation of proposed improvements in Sections 3.1, *Aesthetics and Visual Resources,* 3.2, *Air Quality,* 3.8, *Hazards and Hazardous Materials,* 3.11, *Noise,* and 3.14, *Transportation*, respectively. The analyses presented therein considers and analyze potential impacts associated with construction truck traffic along proposed haul routes. To avoid construction-related safety hazards, implementation of Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety.

*Comment EA-3*

The comment asserts that BCHD's response to public criticism regarding the potential impacts on aesthetics and visual resources resulting from the 2019 Master Plan and the height of structures proposed therein has been completely ignored in the revised Healthy Living Campus Master Plan. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue. As discussed therein, community feedback received from such outreach efforts has helped guide revisions to the conceptual plans for the proposed Healthy Living Campus Master Plan, which was originally released to the public in June 2017. The original site plan included a 6-level parking structure on the vacant Flagler Lot, a 7-story assisted living building, and a 4-story independent living building over 3 levels of parking.

Community feedback was received on issues relating to building height, density of development, and the proximity of the proposed development to adjacent single- and multi-family residential land uses. To address these concerns, the 2019 Master Plan refined the original conceptual plan by removing the proposed parking structure from the vacant Flagler Lot, relocation of the parking to the southeast corner of the BCHD campus, and reducing the height of the RCFE Building to 4 stories by wrapping the building footprint along the eastern boundary of the campus. BCHD further revised the footprint of the RCFE Building to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 sf to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

*Comment EA-4*

The comment expresses concern regarding the EIR analysis of impacts on aesthetics and visual resources, citing specific concerns regarding height of proposed structures, loss of views and ocean breezes, and impacts from shade/shadows cast onto surrounding private residences. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the EIR's analysis of impacts on aesthetics and visual resources, which is supported by photographs, computer-generated photosimulations, and a shade and shadow analysis. As suggested by the comment, numerous site visits were made to collect data, including a wide variety of photographs from areas located on the Project site, adjacent to the Project site, and at further distances.

First, the comment conflates impacts to scenic views and impacts to the visual character of the Project site. The EIR does not make any findings to neighbor character based on long-range views from the intersection of Flagler Lane & 190$^{th}$ Street. Impacts to neighborhood character are addressed under Impact VIS-2. These findings are substantiated by photosimulations from five different locations located immediately adjacent to or in close proximity to the campus (refer to

Figure 3.1-1) as well as a policy consistency analysis (refer to Table 3.1-2). As described for Representative View 2, Representative View 3, and Representative View 4, would noticeably alter the existing views of the Project site from these locations and would reduce blue sky views as the comment suggests; however, the development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from these locations. In fact, the proposed Project includes many attributes that would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm.

*Comment EA-5*

The comment asserts that the EIR is misleading and incorrect in its description of views from Tomlee Avenue. Representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represent views of the Project site from the residential neighborhood within Torrance adjacent to the east of the Project site. This view includes foreground views of the street, mid-ground view of the east-facing single-family residences along Tomlee Avenue, and background views of large, landscaped trees as well as the upper levels of the Beach Cities Health Center and the open sky above. As discussed under Impact VIS-2, the proposed RCFE Building would rise up to 103 feet above the existing campus ground level and 133.5 feet above the vacant Flagler Lot. Views of the proposed RCFE Building from Tomlee Avenue would be partially screened by mature landscaped trees surrounding the single-family residences as well as along the eastern perimeter of the Project site. While the top two stories of the RCFE Building and the rooftop cooling tower would be visible from this location and would obscure a portion of the open sky above, views of the Project site would not change substantially from this location largely in part due to intervening rooflines and taller trees that would obstruct the RCFE Building. This finding is supported by the photosimulations provided by VIZf/x, which

show that development at the Project site would transition from the south of the site to the north, and would not result in a substantial increase in perceived height of the proposed structure compared to existing development.

*Comment EA-6*

The comment states that the EIR's discussion of the existing visual character of the Project site's surroundings cite the existence of 4-story multi-family residential buildings between Beryl Street and Agate Street, but the commenter was unable to locate the referenced 4-story structures. However, the EIR discussion references the development on the northwest corner of the Beryl Street and Flagler Lane intersection, which is in fact a 4-story multi-family residential building. Nevertheless, the discussion of the existing visual character of the Project site in Section 3.1.1, *Environmental Setting*, has been revised to specifically cite reference to this structure, as opposed to general reference to several structures of similar height being located within this area between Beryl Street and Agate Street.

*Comment EA-7*

The comments correctly notes and references local policies provided in the Land Use Elements of the City of Redondo Beach and City of Torrance General Plans that include provisions to assure developments are visually and functionally compatible with existing surrounding development. The comment fails to acknowledge or otherwise challenge the detailed discussion and policy consistency analysis presented in Tables 3.10-3 and 3.10-5. As described therein, the proposed Project would not present any conflict with the policies referenced by the commenter.

*Comment EA-8*

The comment notes the responsiveness to scoping comments on the need for air quality mitigation measures; however, the comment expresses concern that proposed Mitigation Measure (MM) AQ-1 may not be enough to prevent large amounts of fugitive dust from escaping the Project site and watering of exposed soils three times a day may be too little. The comment recommends an additional measure to include a small portable enclosure to be placed over the exposed area and pulverized concrete to trap dust. MM AQ-1 base on best practices employed by agencies and proven successful in reducing or preventing fugitive dust from construction of new development, including demolition of existing structures and concrete materials. In addition to these measures, as discussed under Impact AQ-2, the proposed Project would also be subject to existing regulations and requirements of the SCAQMD, including SCAQMD Rule 403 which requires the implementation of best available dust control measures during active operations capable of generating fugitive dust. Based on the proposed mitigation measure and requirements of existing

regulations, no additional mitigation is considered necessary to reduce potential impacts of the Project related to construction-related fugitive dust emissions. This is supported by extensive air quality modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to Master Response 10 – Air Quality Analysis for additional detailed discussion and a response to comments pertaining to this issue.

*Comment EA-9*

The comment states that the planned outbound haul route on Beryl Street would take thousands of trucks past the entrance to Towers Elementary School and may represent a hazard that requires mitigation, but the commenter was unable to locate this discussion in the EIR. The analysis of Project impacts resulting from construction traffic on local roadways is discussed in Section 3.14, *Transportation*. As discussed therein, construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity would be potentially significant. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street.

However, in addition to the identified mitigation, due to requests from the City of Torrance and the Torrance Unified School District (TUSD) for revisions to the construction haul routes proposed in the Draft EIR, the following construction haul routes have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to schools:

- The road segment of Beryl Street between Flagler Lane and West 190$^{th}$ Street would be avoided. Outbound haul trucks would instead leave the Project site from the vacant Flagler Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190$^{th}$ Street towards Interstate (I-) 405.

- The segment of Prairie Avenue between 190$^{th}$ and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesiea Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.

- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

These proposed inbound and outbound construction haul routes for the proposed Project have been revised in the Final EIR in response to these requests from the City of Torrance and TUSD. It should also be noted that TUSD has acknowledged that this revision would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

**Letter EN**

March 24, 2021
Elisa Nye
North Juanita Avenue

*Comment EN-1*

The comment expresses general concern regarding potential impacts on traffic and congestion, asserting, without substantial evidence or expert opinion, that getting in and out of the neighborhood near the Beach Cities Health District (BCHD) campus would become very difficult during construction and operation of the Project. First, it should be noted that pursuant to Senate Bill (SB) 743 and California Environmental Quality Act (CEQA) Guidelines Section 15064.3, vehicle miles travel (VMT) has replaced roadway capacity-based or automobile delay-based level of service (LOS), as the metric for transportation impact analysis (refer to Section 3.14, *Transportation*). Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and intersted residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

The comment does not provide any substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of these analyses.

*Comment EN-2*

The comment expresses concern that the proposed Project would displace many family doctors that are currently located at the BCHD campus, making it difficult for residents of the Beach Cities to access regular health care. As described in Section 2.0, *Project Description,* space on the existing campus is leased to a variety of tenants and private medical practitioners within the Beach Cities Advanced Imaging Building (510 North Prospect Avenue), Beach Cities Health Center (514 North Prospect Avenue), and the Providence Little Company of Mary Medical Institution Building (520 North Prospect Avenue). Under Phase 1 of the proposed Project, the existing Beach Cities Advanced Imaging Building (510 North Prospect Avenue), associated parking structure (512 North Prospect Avenue), Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) and associated surface parking lot and subterranean parking garage would remain in place on the campus, and no interruption in services provided by these facilities would occur. Further, the Beach Cities Health Center (514 North Prospect Avenue) would remain in place for the duration of construction of the proposed RCFE Building to allow most of BCHD's existing programs to continue.

Though demolition of the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) may occur as part of the Phase 2 development program, demolition of this building would not occur until after the end of existing tenant leases in 2030. Additionally, this building would be replaced with a purpose built medical office building.

Therefore, although the implementation of the proposed Project would result in the removal of 42,000 square feet (sf) of medical office from the Beach Cities Health Center, nearly 93,000 sf of medical office would remain on the campus.

*Comment EN-3*

The comment expresses opposition to the proposed plans for the Aquatic Center, claiming that outdoor swimming pools that can support lessons, swim teams, and rehabilitation would better address the needs of the community. This comment does not address the adequacy of the EIR or the impact analysis and represents the commenter's opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment EN-4*

The comment expresses general concern regarding the construction impacts of the proposed Project on nearby schools. The EIR includes detailed discussion and analysis of construction-related impacts on nearby sensitive receptors, including Towers Elementary School. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a ton schools from construction-related hazards. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to comments pertaining to these issues.

*Comment EN-5*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter ES**

June 6, 2021
Elisabeth Schneider

*Comment ES-1*

The comment expresses general concern regarding the Project's impacts on the health of surrounding sensitive receptors, particularly with regard to air quality. As described in Master Response 10 – Aesthetics and Visual Resources Analysis, the EIR provides a detailed analysis of constructed related air quality emissions and potential impacts on the health of nearby sensitive receptors, which was supported by an exhaustive quantitative modeling effort. With the implementation of Mitigation Measure (MM) AQ-1 construction activities would not result in criteria air pollutants or toxic air contaminants (TACs) that would exceed the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

*Comment ES-2*

The comment requests detailed information regarding the number of individuals located within 1 mile of the Project site that are diagnosed with chronic obstructive pulmonary disease (COPD), asthma, emphysema, and any other lung-related health conditions. Not only is this data collect not

possible due to the Health Insurance Portability and Accountability Act (HIPAA), but these comments do also not address to the adequacy of the EIR with regard to the air quality analysis and mitigation measures. Detailed discussion and analysis of Project impacts on air quality is presented in Section 3.2, *Air Quality.* As presented therein, based on detailed modeling of Project construction and operational emissions following approved methodologies adopted by local air quality management agencies, the proposed Project, with implementation of identified mitigation measures, would not generate air quality emissions that would create or contribute to the violation of air quality standards, which are established by Federal and State agencies for protecting the quality of the air and the health of residents of the air basin. Refer to Master Response 10 – Air Quality Analysis for detailed discussion of Project construction impacts on air quality, including those on nearby sensitive receptors, which include single-family residences located in the vicinity of the proposed Project.

**Letter FB1**

May 22, 2021
Frank Briganti
West Torrance

*Comment FB1-1*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment FB1-2*

The comment incorrectly claims asserts that West Torrance residents were not considered in the analysis of Project impacts. Contrary to this comment, the EIR includes detailed analysis of physical environmental impacts to surrounding sensitive receptors, including the single-family residential neighborhood to the east within the City of Torrance. For example, Section 3.1, *Aesthetics and Visual Resources* identifies representative views from this area. Additionally, Section 3.2, *Air Quality* and Section 3.11, *Noise* specifically identify sensitive receptors within this area. Section 3.14, *Transportation* thoroughly discusses cut-through traffic and potential safety hazards within this area. The assertion that the West Torrance residents were not considered is unfounded and not supported by the public record.

*Comment FB1-3*

The comment asserts that Towers Elementary School was not considered in the analysis of Project impacts. Please refer to response to Comment FB1-2 above for detailed discussion and response to comments regarding consideration of impacts within the City of Torrance. Towers Elementary School was specifically included and addressed as a sensitive receptor during the consideration of construction and operational impacts associated with the proposed Project. The assertion that Towers Elementary School was not considered is unfounded and not supported by the public record.

*Comment FB1-4*

The comment states, without substantial evidence or expert opinion, that proposed haul truck and construction equipment routes would impact West Torrance neighborhoods. As presented in Section 3.14, *Transportation,* construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation. For additional discussion and a detailed response to comments pertaining to construction-related impacts, refer to Master Response 13 – Transportation Analysis.

It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

*Comment FB1-5*

The comment states that the EIR does not identify Completion and Financial Bonds. However, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

*Comment FB1-6*

The comment states, without substantial evidence or expert opinion, that the proposed Project would involve a massive commercial structure in a residential area that would generate window glare and lighting affecting nearby residents. However, the EIR does include detailed discussion and analysis of impacts on light and glare in Section 3.1, *Aesthetics and Visual Resources*. As discussed therein, lighting associated with the proposed Project would generally be similar in type and intensity to the lighting sources surrounding the Project site. The nearest light-sensitive receptors to the Project site include the multi-family residences to the north of Beryl Street and the single-family residences to the east of Flagler Lane. Dominguez Park to the northeast could also experience an increase in light intrusion from the Project. However, the lighting associated with the proposed RCFE Building would comply with Redondo Beach Residential Design Guidelines for Multi-Family Residential, which require that the type and location of building lighting preclude direct glare onto adjoining property, streets, or skyward, and all lighting be designed to shine downward. Additionally, the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. Due to the proposed increase in building mass and size, it is expected that the Project would include a greater number of windows and reflective surfaces than the existing Project site. The reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the Redondo Beach Municipal Code RBMC and prevent substantial glare. Architectural design and materials would be intended to minimize the lighting and glare effects on public views. For these reasons, the proposed Project would not constitute a new source of substantial nighttime light pollution or glare; therefore, effects would be less than significant.

*Comment FB1-7*

The comment asserts, without substantial evidence or expert opinion, that the proposed Project would result in rodent infestation in surrounding neighborhoods. Issues related to rodents are

discussed in the EIR, which notes that *"[d]ue to the presence of the Silverado Memory Care Community and associated dining services on the campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus."* In light of this ongoing program, assertions that the proposed Project would result in vermin infestations are unfounded and speculative.

*Comment FB1-8*

The comment notes that there are too many dangers and safety problems to address. However, the comment provides no further details to clarify these concerns. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter FB2**

June 9, 2021
Dr. Frank Briganti
Tomlee Avenue
Torrance, CA

*Comment FB2-1*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment FB2-2*

The comment incorrectly asserts that West Torrance residents were not considered in the analysis of Project impacts. Refer to the response to Comment FB1-2 for a detailed response to comments describing how West Torrance residences were considered as sensitive receptors and addressed throughout the environmental impact analysis provided in the EIR.

*Comment FB2-3*

The comment asserts, without substantial evidence or expert opinion, that noise, fugitive dust, and toxic or hazardous materials will directly affect nearby sensitive receptors. Contrary to the commenter's assertion, these potential construction-related impacts were discussed in detail within

Section 3.11, *Noise*, Section 3.2, *Air Quality*, and Section 3.8, *Hazards and Hazardous Materials*. Additionally, mitigation measures were provided to reduce potential impacts to the maximum extent feasible. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

*Comment FB2-4*

The comment states, without substantial evidence or expert opinion, that the proposed Project would involve the construction massive commercial structure in a residential area, which would also generate window glare affecting nearby residents. The comment incorrectly claims that an analysis of potential impacts related to light and glare were not considered in the EIR. However, as described in the response to Comment FB1-6, the EIR does include detailed discussion and analysis of Project impacts on light and glare in Section 3.1, *Aesthetics and Visual Resources*.

*Comment FB2-5*

The comment states that there should be no truck routes for the proposed Project, as they would present safety issues in residential areas and delay emergency response. As presented in Section 3.14, *Transportation,* construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. Refer to the response to Comment FB1-4 as well as Master Response 13 – Transportation Analysis for a detailed response to comments related to construction-related safety hazards and emergency access.

The comment further states that Redondo Beach Fire Station is too far from the Project site. However, as presented in Section 3.13, *Public Services,* the BCHD campus is located within Redondo Beach within approximately 1.2 miles of the three RBFD fire stations, and is well within the 6-minute fire response time area and 6-minute and 20-second Emergency Medical Service (EMS) response time for the Redondo Beach Fire Department (RBFD). Records indicate that a total of 451 EMS calls associated with the campus at 514 North Prospect Avenue occurred between January 2015 and July 2019, with an average of 98 calls per year and just over 8 calls per month for the 60 double-occupancy Memory Care units with 120 beds total. Thus, the Project site is considered to be well within the appropriate distance and response time for Redondo Beach Fire Stations.

*Comment FB2-6*

The comment states that the proposed Project is a commercial project disguised as a medical project. This comment does not address to the adequacy of the EIR with regard to the

environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* Nevertheless, it should be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

*Comment FB2-7*

The comment asserts, without any substantial evidence or expert opinion that there is no problem reducing the size of the proposed Project. However, this comment provides no specific suggestions or details to further clarify this assertion. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

*Comment FB2-8*

The comment requests eliminating the Silverado large expansion project and reduce time frame to 1 year only. However, this comment fails to acknowledge that by eliminating the proposed Memory Care community (and the proposed Assisted Living Facility) the proposed Project would not meet the basic project objectives. the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. Accordingly, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs.

*Comment FB2-9*

The comment states that the EIR does not identify Completion and Financial Bonds. However, as described in the response to Comment FB1-5, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

*Comment FB2-10*

The comment incorrectly asserts that working times have not been noted. As described in Section 2.5.1.6, *Construction Activities,* BCHD has proposed the following construction hours for the proposed Project, consistent with Redondo Beach Municipal Code (RBMC) Section 4-24.503 and Torrance Municipal Code (TMC) Section 6-46.3.1:

- 7:30 a.m. to 6:00 p.m. Monday through Friday; and
- 9:00 a.m. to 5:00 p.m. Saturday.

*Comment FB2-11*

The comment restates its assertion that West Torrance residents were not considered in the analysis. Refer to response FB1-2 for a detailed discussion and response to comments regarding consideration of impacts to West Torrance residents.

## Letter FVC

June 10, 2021
Frank Von Coelln

*Comment FVC-1*

The comment states, without substantial evidence or expert opinion, that the Project would result in shade/shadow and privacy impacts on nearby residences. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues. It should be noted that the California Environmental Quality Act (CEQA) requires an assessment of impacts to public views rather than private views and privacy.

*Comment FVC-2*

The comment asserts, without substantial evidence, that the proposed Project would result in significant damage to blue sky views, glare and nighttime lighting, and shading. This comment is identical to that provided in Comment DH1-1. Refer to the response to Comment DH1-1 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding impacts associated with aesthetics and visual resources, including height and size of the proposed Residential Care for the Elderly (RCFE) Building, access to skyline views, compatibility with the surrounding neighborhood, shade and shadow effects, and privacy concerns. The impact analysis included in Section 3.1, *Aesthetics and Visual Resources* is informed by photosimulations prepared by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, as well as renderings of the development under Phase 2 and a detailed shade and shadow analysis. The comment does not challenge any specific aspect of these technical studies or the policy consistency analysis described under Impact VIS-2.

*Comment FVC-3*

The comment asserts that representative views presented in the EIR are flawed and deceptive and were used to justify proposed mitigation. However, as described in Master Response 9 – Aesthetics and Visual Resources Analysis a total of six representative views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. These six representative views encircle the BCHD campus and provide west, southwest, south, and northeast facing views of the Project site. Representative Views 2, 3, and 5 in particular provide views of the Project site from a distance of less than 100 feet that are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter's assertion that these views used in the analysis of visual impacts are deceptive or that the height of proposed development is underrepresented.

The comment appears to conflates impacts to scenic views and impacts to the visual character of the Project site and surrounding areas. With regard to maximum elevation views along West 190$^{th}$ Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190$^{th}$ Street that provide slightly elevated views – including the intersection of Prospect & West 190$^{th}$ Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource. The EIR does not make any findings to neighbor

character based on long-range views from the intersection of Flagler Lane & 190th Street. Impacts to neighborhood character are addressed under Impact VIS-2. These findings are substantiated by photosimulations from five different locations located immediately adjacent to or in close proximity to the campus (refer to Figure 3.1-1) as well as a policy consistency analysis (refer to Table 3.1-2).

Therefore, the representative views identified and utilized in the analysis of this EIR are considered adequate to inform the analysis of impacts to aesthetics and visual resources consistent with the CEQA Guidelines, and inclusion or consideration of additional representative views is not necessary.

*Comment FVC-6*

The comment asserts, without substantial evidence, that the proposed RCFE Building is incompatible with surrounding neighborhoods and violates City of Redondo Beach and City of Torrance General Plan policies and municipal codes governing compatibility of scale, mass, and character of new development with surrounding neighborhoods. Refer to Master Response 9-Aesthetics and Visual Resources Analysis for further discussion on design revisions, building height, and visual character.

*Comment FVC-7*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter FF1**

April 12, 2021
Fred Fasen

*Comment FF1-1*

The comment questions how the proposed public/private partnership would benefit the citizens and residents of the Beach Cities. Additionally, the comment questions when taxpayers gave the Beach Cities Health District (BCHD) the right to develop public property. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and a response to concerns pertaining to the benefits of the proposed Project. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to

comments pertaining to the proposed public/private partnership. As described therein the BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

*Comment FF1-2*

The comment correctly describes that the proposed Project would result in significant and unavoidable noise impacts, which are described in detail within Section 3.11, *Noise* under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. However, it should be noted that the proposed Project would not result in a significant impact related to vibration. This issue is discussed in detail within Section 3.11, *Noise* under Impact NOI-2.

*Comment FF1-3*

The comment requests a new and improved BCHD be proposed for the taxpayers. However, the comment provides no specifics to further clarify this request or to offer additional alternatives that should be considered for analysis. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter FF2**

May 26, 2021
Fred Fasen

*Comment FF2-1*

The comment asserts that the citizens didn't approve the 2019 Master Plan and that the revised Health Living Campus Master Plan. As described under Master Response 9 – Aesthetics and Visual Resources Analysis community feedback received from early public outreach efforts has helped guide revisions to the conceptual plans for the proposed Healthy Living Campus Master Plan, which was originally released to the public in June 2017. The original site plan included a 6-

level parking structure on the vacant Flagler Lot, a 7-story assisted living building, and a 4-story independent living building over 3 levels of parking. Community feedback was received on issues relating to building height, density of development, and the proximity of the proposed development to adjacent single- and multi-family residential land uses. To address these concerns, the 2019 Master Plan refined the original conceptual plan by removing the proposed parking structure from the vacant Flagler Lot, relocation of the parking to the southeast corner of the Beach Cities Health District (BCHD) campus, and reducing the height of the Residential Care for the Elderly (RCFE) Building to 4 stories by wrapping the building footprint along the eastern boundary of the campus. BCHD further revised the footprint of the RCFE Building to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 sf to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

*Comment FF2-2*

The comment generally asserts, without substantial evidence or expert opinion, that noise, traffic, and pollution generated by the proposed Project would be too much for the City of Redondo Beach. However, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

*Comment FF2-3*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final

EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter GD**

June 6, 2021
Gary Dyo

*Comment GD-1*

The comment expresses general opposition to the proposed Project due to the duration of construction activities and comments provided further in this letter. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment GD-2*

The comment asserts, without substantial evidence and expert opinion, that the proposed Project will block sunlight and obstruct views from all directions. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to the analysis of impacts on public views and shade and shadows. This analysis is supported by more than a dozen photographs as well as detailed computer-generated photosimulations and a shade and shadow study prepared by licensed architects. The comment does not challenge the thresholds, methodologies, or findings of these technical studies.

*Comment GD-3*

The comment notes that the Project site is located nearby existing residences and schools. The comment correctly notes that the Project site is located approximately 80 feet from the nearest sensitive receptor. It should be noted that Towers Elementary School is located approximately 350 feet from the Project site. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, and Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to the impacts on nearby residences and school.

*Comment GD-4*

The comment states that the proposed Project would result in 10,000 heavy haul truck trips coming into nearby residential neighborhoods. Refer to Master Response 13 – Transportation Analysis for

detailed discussion and response to comments pertaining to construction traffic and potential impacts the surrounding transportation network, including bicycle and pedestrian facilities.

*Comment GD-5*

The comment states that the proposed Project must not commence. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter GPA**

June 10, 2021
George and Pam Afremow
19412 Linda Dr., Torrance

*Comment GPA-1*

The comment describes the commenters' participation in previous public scoping and other public meetings held by the Beach Cities Health District (BCHD) and incorrectly implies that the Environmental Impact Report (EIR) ignores much of the public concern regarding impacts. Contrary to this assertion, the summary provided in Section 1.8, *Areas of Known Public Controversy*, clearly complies with the intent of California Environmental Quality Act (CEQA) Guidelines Section 15123, which is referenced in the comment and states that *"[a]n EIR shall contain a brief summary of the proposed actions and its consequences."* The summary provides approximately 2 pages of bulleted issues that were known to be of concern during the preparation of the EIR. Additionally, as described in Section 1.8, *Areas of Known Public Controversy*, all comments letters received on the Notice of Preparation (NOP) were also provided as Appendix A to the EIR. Each of these comment letters was reviewed and marked up to identify individual environmental issues. Each of these issues was considered and responded to during the preparation of the environmental impact analysis provided in the EIR. The assertion that the community's concerns have fallen on deaf ears is unfounded.

The comment further asserts that the proposed Project's square footage and height have increased since the original site plan was released to the public in June 2017. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion of previous revisions to the proposed Health Living Campus Master Plan.

*Comment GPA-2*

The comment asserts, without substantial evidence or expert opinion, that the implementation of the proposed Project would result in impacts related to concrete dust, asbestos-containing material (ACM), lead, polychlorinated biphenyls (PCBs), and mold. Hazardous building materials are discussed in detailed in Section 3.8, *Hazards and Hazardous Materials.* Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue. As described therein, Mitigation Measure (MM) HAZ-1 requires BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and potentially the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, the licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. During construction the licensed contractor shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed. MM HAZ-1 clearly meet the requirements for mitigation to avoid potential impacts related to the potential for exposure to hazardous building materials. Additionally, CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

It should also be noted that the comment incorrectly states that demolition and construction would occur for a period of 5 to 10 years. For clarification while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years.

It should also be noted that Towers Elementary School is located approximately 350 feet away from the Project site and the closest point between the BCHD campus boundary and the recreational field.

*Comment GPA-3*

The comment incorrectly claims that the proposed development does not conform zoning designation at the Project site. The comment states that the Project site was always intended to be for the use of, and the betterment of, the local residents. Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. Refer also to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. For decades, BCHD, which is a California Healthcare District, has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter the use of the campus, which would continue to provide needed community health and wellness programs and services, including needed senior housing. Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted in P-CF zones with a CUP. A Conditional Use Permit (CUP) is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory Care Community. The proposed Project – like other improvements made on the campus in the past – would require a CUP that would be issued under the existing code. As described in RBMC Section 10-2.1116, the FAR, building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes.

*Comment GPA-4*

The comment states, without substantial evidence or expert opinion, that the proposed Project would double the traffic congestion in the area, disregarding the exhausting transportation analysis provided in Section 3.14, *Transportation*, which is supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments regarding construction-related and operational transportation issues, including issues related to vehicle, pedestrian, and bicyclist safety.

*Comment GPA-5*

The comment asserts, without substantial evidence, that the proposed development is not consistent with the character of the adjacent residential land uses. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to commenters pertaining to building height and visual character. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would comply with the required building height prescribed in RBMC Section 10-2.622 and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Beyond the subjective assertion that the building is not consistent with the character of the adjacent residential land uses the comment does not challenge any specific aspects of the analysis of visual character presented under Impact VIS-2 or provide any substantiating evidence to further support its assertion.

The comment also expresses concern regarding shade and shadows and obstruction of wind and coastal breezes, due to the size of the proposed Project. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the analysis of aesthetics and visual resources, including shade and shadows. As described in Section 3.1, *Aesthetics and Visual Resources*, a shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M). Further, the comment does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore wind patterns.

*Comment GPA-6*

The comment requests that BCHD does not go forward with the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter GP1

March 14, 2021
George Parker

*Comment GP1-1*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment GP1-2*

The comment describes a need for affordable housing senior housing. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments regarding the affordability of Assisted Living units and Memory Care are facilities. It should be noted that 10 percent of the proposed units are being considered at below-market rates. It should also be noted that BCHD would reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community, including lower-income individuals.

*Comment GP1-3*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter GNY1

June 4, 2021
Glen & Nancy Yokoe
Residing on Tomlee Avenue
North Cul De Sac

*Comment GNY1-1*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final

EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment GNY1-2*

The comment expresses general concerns, without substantial evidence or expert opinion, regard air pollution, dust, hazards, noise, and traffic that will harm community. The comment also asserts the proposed Project is oversized and incompatible in its design and proposed uses with the site and surrounding land uses. Detailed discussion and analysis of Project impacts from air pollution, dust, noise, and traffic is provided in Section 3.2, *Air Quality,* 3.8, *Hazards and Hazardous Materials,* 3.11, *Noise,* and 3.14, *Transportation*. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion and response to comments regarding these issues. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

*Comment GNY1-3*

The comment references an excerpt from the Letter FL1 and asserts, without substantial evidence, that the EIR is deficient in its analysis of air quality, noise, transportation, and public health impacts and mitigation measures. Please refer to responses to Comments FL1-61 through FL1-72 for detailed discussion and response to comments pertaining to these issues.

**Letter GNY2**

June 10, 2021
Glen & Nancy Yokoe
West Torrance
Pacific South Bay Residents

*Comment GNY2-1*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment GNY2-2*

The comment generally asserts, without substantial evidence, that the EIR is deficient in its assumptions, omits data, minimizes impacts, and is lacking analysis with regard to aesthetics and visual resources, air quality, hazards and hazardous materials, land use, and noise. However, the commenter fails to provide specifics or further details to clarify how the EIR is deficient in these ways. A detailed discussion and analysis of potential impacts on aesthetics and visual resources, air quality, hazards and hazardous materials, land use, and noise is provided in Section 3.1, *Aesthetics and Visual Resources,* Section 3.2, *Air Quality,* Section 3.8, *Hazards and Hazardous Materials,* Section 3.10, *Land Use and Planning,* and Section 3.11, *Noise,* respectively. Refer to Master Response 8 – Aesthetics and Visual Resources Analysis, Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues.

The comment also asserts that the description of the Phase 2 development program is vague and the analysis of aesthetics and visual resources lacks proper photosimulations. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of Analysis for a detailed discussion and a response to comments pertaining to the description of the Phase 2 development program.

*Comment GNY2-3*

The comment states, without substantial evidence, that the proposed development is incompatible with adjacent communities and violates City of Redondo Beach and City of Torrance General Plan policies. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for additional discussion regarding previous revisions to the proposed Healthy Living Campus Master Plan as well as a discussion of building height and visual character.

*Comment GNY2-4*

The comment asserts that demolition of the Beach Cities Health Center would expose nearby residents and schools to hazardous materials, irritants, and carcinogens. As described in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-2, construction activities would implement all applicable Federal, State, and local codes and regulations, best management practices, and required mitigation measures related to the treatment, handling, and disposal of hazardous materials to ensure public safety. Adherence to these regulations, best management practices, and mitigation measures would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public,

including nearby residences and schools. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments on this subject.

*Comment GNY2-5*

The comment asserts that excavation and trenching of contaminated soils would release hazardous materials affecting surrounding neighborhoods. This issue is addressed in detail in Section 3.8, *Hazards and Hazardous Materials*. While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that tetrachloroethylene (PCE) is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). With the implementation of the Mitigation Measure (MM) HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant.

*Comment GNY2-6*

The comment incorrectly asserts, without substantial evidence, that air quality onsite exceeds South Coast Air Quality Management District (SCAQMD). The EIR includes detailed analysis of construction-related air emissions in Section 3.2, *Air Quality*, supported by exhaustive quantitative air emissions modeling. With the implementation of MM AQ-1, construction-related air emissions would not exceed SCAQMD thresholds and would not create or contribute to air quality violations. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments regarding construction and operational air quality emissions.

*Comment GNY2-7*

The comment asserts that noise will exceed the Federal Transit Authority (FTA) thresholds adversely affecting hearing, interfere with sleep, result in physiological response, cause annoyance, and affect overall wellbeing of nearby residents. The comment correctly describes that the proposed Project would result in significant and unavoidable noise impacts, which are described in detail within Section 3.11, *Noise* under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding the temporary, but prolonged construction noise impacts on nearby sensitive receptors.

The comment does not provide any substantial evidence or expert opinion regarding the commenter's assertion that the proposed project would affect hearing, interfere with sleep, result in physiological response, etc.. However, it should also be noted that while other commenters have provided articles, studies, and literature reviews (e.g., refer to the responses to Letter TRAO, FL1, and FL2) they generally show no clear connection to the proposed Project or the environmental impact analysis in the EIR.

*Comment GNY2-8*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter GDV**

June 10, 2021
Grace DuVall

*Comment GDV-1*

The comment asserts, without substantial evidence or expert opinion, that the proposed Project would generate many health issues that would impact students at Towers Elementary and all surrounding schools and homes. The comment goes on to claim, without providing any specific or further detail, that the Environmental Impact Report (EIR) downplays significant impacts. However, contrary to the commenter's assertion, the EIR includes detailed analysis of potential impacts on nearby sensitive receptors throughout the EIR. This analysis is supported by technical studies and exhaustive modeling efforts prepared by recognized experts in their field. For example, the air quality analysis presented in Section 3.2, *Air Quality* presents the results of the California Emissions Estimator Model (CalEEMod) and construction Health Risk Assessment (HRA) prepared for the proposed Project by the air quality experts at iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. The CalEEMod results and the conclusion of the construction HRA are the results of carefully made assumptions reading schedule, duration, construction equipment, and application of air emissions control measures as well as robust air quality modeling. The air quality analysis compares the results of these studies to the quantitative significance thresholds established by the South Coast Air Quality Management District (SCAQMD) and meets all of the requirements in the California Environmental Quality Act (CEQA) Guidelines. The analysis demonstrates that with the implementation of Mitigation

Measure (MM) AQ-1, there impacts related to criteria air pollutants and toxic air contaminants (TACs) would be less than significant. Beyond simple assertions that construction activities would result in health impacts on sensitive receptors, the comments provided on this issue do not challenge the methodology, assumptions, or quantitative results of the technical studies or extensive quantitative modeling efforts.

*Comment GDV-2*

The comment states, without substantial evidence, that the proposed development is incompatible with adjacent communities and violates City of Redondo Beach and City of Torrance General Plan policies. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues. As described in Section 3.1, *Aesthetics and Visual Resources Analysis* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings.

*Comment GDV-3*

The comment requests more details regarding health impacts of air quality, hazardous materials, and noise, stating that the EIR is deficient in providing the full scope of health impacts. However, the commenter fails to provide specifics or further details to clarify how the EIR is deficient. The EIR provides detailed discussion and analysis of Project air quality, hazard, and noise impacts on the environment, as well as on nearby sensitive receptors, in Sections 3.2, *Air Quality,* Section 3.8, *Hazards and Hazardous Materials,* and Section 3.11, *Noise,* respectively. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, and Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to these issues.

## Letter GP2

April 13, 2021
Greg Podegracz

*Comment GP2-1*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced

to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment GP2-2*

The comment states, without substantial evidence that the proposed Project is too big and too intrusive on the surrounding neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Comment GP2-3*

The comment asserts, without identifying specific locations, that there are plenty of locations around the South Bay that could support development of the proposed Project. The comment also states that the Beach Cities Health District (BCHD) could redevelopment the AES Redondo Beach Power Plant. However, as described in the response to TRAO-96, which also addressed this issue, the discussion in the EIR provides clear discussion of the barriers of completing the Project on alternative sites and meets the requirements of California Environmental Quality Act (CEQA) Guidelines Section 15126.6(f), which states that *"[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project."* Specifically, CEQA Guidelines Section 15126.6(f)(2)(B) requires that *"[i]f the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR."* As an example, the discussion explains that the AES Redondo Beach Power Plant site is large enough, but is zoned as P-GP and would not allow for medical office and health-related facilities, or residential care facilities. BCHD could apply for a zoning change, but pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. For example, AES Redondo Beach LLC finalized the sale of the power plant site to a private developer in March 2020. The new owner of the site is currently considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. As described in CEQA Guidelines Section 15126.6(f)(3), *"[a]n EIR need not consider an alternative…whose implementation is remote and speculative."*

*Comment GP2-4*

The comment again expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter HRP**

May 17, 2021
Hamant and Robin Patel

*Comment HRP-1*

The comment asserts that information regarding economic, social, and housing factors must be added to the Environmental Impact Report (EIR) to allow the Beach Cities Health District (BCHD) to consider the factors in reaching a decision on the proposed Project. The comment goes on to state information regarding economic fairness of the Project, and asserts that the EIR does not provide sufficient analysis to support whether new residents would be from the supporting beach cities and whether these residents would be able to afford the monthly rent. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures,* the California Environmental Quality Act (CEQA) requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15131 specifically states *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment."*

Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units as well as Master Response 6 – Financial Feasibility for a detailed discussion and response to comments regarding the market feasibility analyses prepared for the proposed Project.

*Comment HRP-2*

The comment asserts that clarification is needed to define existing regional force from which construction of the Project would draw workers from. The comment further asks whether this regional workforce would benefit the supporting cities. For the purposes of this EIR, the existing regional workforce is defined as those residing within the Beach City and the Greater Los Angeles County Area that are able to work, and would be able to fulfill employment opportunities created by the proposed Project. Considering the Project would create new employment opportunities within the Beach Cities, the proposed Project has the potential to benefit local cities by helping to

reduce unemployment rates. These issues are discussed in detail in Section 3.12, *Population and Housing* and Section 4.4, *Growth Inducing Impacts*.

*Comment HRP-3*

The comment asserts that the EIR establishes that there would not be an economic labor benefit to the supporting cities. However, the EIR does not determine whether or not the proposed Project would result in an economic labor benefit. Rather, pursuant to CEQA Guidelines Section 15126.2(e), the EIR discusses *"the ways in which the proposed Project could foster economic or population growth, the construction of additional housing, either directly or indirectly, in the surrounding environment."* The discussion presented in Section 4.4, *Growth Inducing Impacts*, discloses that while the proposed Project is expected to draw most workers from the existing regional workforce, the proposed Project would not be considered growth inducing because it would not substantially affect long-term employment opportunities or require the construction of additional housing stock. Further, consistent with CEQA Guidelines Section 15126.2(e), this analysis does not assume that growth in the area is necessarily beneficial, detrimental, or of little significance to the environment.

*Comment HRP-4*

The comment asserts that additional information and analysis of the economic feasibility of the proposed Project is required, specifying that additional analysis supporting the need for the Project and the financial analysis for when the beach cities will recover their investment is needed. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to these issues.

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**Letter JE1**

June 2, 2021
Jackie Ecklund
Torrance Resident

*Comment JE1-1*

The comment expresses general frustrations regarding the length of the Environmental Impact Report (EIR) and time available to read the complete document. The comment recognizes that the Draft EIR public review period was extended in light of the going COVID-19 pandemic, but the commenter describes that recent transitions in school schedules have made it more difficult for parents who work from home to review the document. As described in Section 1.4, *Public Review*

*and Comments*, the California Environmental Quality Act (CEQA) requires a 45-day comment period for the Draft EIR. However, the Beach Cities Health District (BCHD) has extended the comment period to 90 days in order to ensure the public has ample time to review and comment.

*Comment JE1-2*

The comment describes that Phase 1 of the proposed Project would take place near Flagler Lane and Beryl Street and asserts, without substantiating evidence or expert opinion, that the proposed Project would affect residents and students in the vicinity. Detailed discussion and analysis of Project impacts on air quality, hazards/hazardous conditions, and noise, as well as a detailed list of nearby sensitive receptors located in the vicinity of the Project, is provided in Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise*, respectively. In addition, detailed analysis of aesthetics and visual resources (e.g., building height, visual character, light and glare, and shade and shadows) and transportation, is provided in Section 3.1, *Aesthetics and Visual Resources*, and Section 3.14, *Transportation*. Within each of these sections of the EIR, the analysis compares reasonably foreseeable impacts of the Project to Federal, State, and locally adopted thresholds of significance. Where a potentially significant impact is identified, the EIR presents detailed mitigation measures to be implemented for the purpose of reducing impacts below the level of significance. However, where mitigation cannot feasibly reduce the impacts to a less than significant level, the EIR discloses the effects of the proposed Project for the purpose of providing such information to Project decision makers so that they may make an informed decision regarding adoption of the Project. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

*Comment JE1-3*

The comment states that construction noise is unavoidable and asks that a timeframe for construction be provided if construction is delayed. However, it is not the responsibility of the EIR to speculate delays in construction scheduling that may result from unpredictable circumstances, such as weather. The estimated construction schedule described in Section 2.5, *Proposed BCHD Healthy Living Campus Master Plan* is based upon the reasonable duration of time necessary to complete implementation of proposed improvements based upon the scope and scale of proposed improvements, typical construction hours, number of construction personnel, and other typical restrictions on construction schedule. These estimates were developed with significant input from construction managers/schedulers at CBRE and were supported by a robust Construction

Management Plan describing construction activities, sequencing, and heavy equipment requirements. Pursuant to CEQA Guidelines 15003, the description of construction activities clearly makes a *"a good-faith effort at full disclosure"* and is based on detailed construction scheduling information provided by a well-renowned construction management firm with decades of experience managing projects far more complex than the proposed redevelopment of the BCHD campus.

The comment further asserts that construction noise would interfere with Tower's Elementary School and people who work remotely from home. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to the analysis of noise and vibration impacts. It is important to note that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Therefore, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the campus. However, the indoor learning environment is separated from the campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. Torrance Unified School District (TUSD) has been notified of the proposed Project and has commented on the EIR (refer to Letter KB).

*Comment JE1-4*

The comment requests the measurements of the proposed Southern California Edison (SCE) Substation and states that it would be dangerous to locate the substation across the street from residential homes on Diamond Street and North Prospect Avenue due to potential impacts from noise generated by the substation. As described in Section 2.5.1.4, *Utilities and Services*, the proposed Project design for the electrical distribution system includes a SCE Substation, medium voltage distribution system, and generator yard, which would be located along the south end of the Project site. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response

to comments regarding to noise of the proposed substation. As described therein, According to the National Electrical Manufacturers Association (2014) and Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50 feet, which is well below the $L_{dn}$ noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed substation would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment.

For other issues related to the proposed substation, refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

*Comment JE1-5*

The comment states, without substantial evidence or expert opinion, that siting of a service entrance and loading dock and service entry/exit along Flagler Lane may create unsafe traffic conditions on Flagler Lane and Street, particularly for parents who pick-up and drop off students at Towers Elementary School. The comment further requests a traffic study be prepared for Towers Elementary School and Beryl Elementary School and analyze how the project would impact the intersection of Flagler Lane and Beryl Street. However, Section 3.14, *Transportation* already provides a detailed discussion and analysis of potential impacts, including effects on intersection operations, roadway congestion, traffic hazards, and vehicle conflicts along nearby roads and near schools in the proximity of the Project site. This analysis is supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues.

It should be noted that the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by taking a right off of Flagler Lane and exit taking a left turn onto northbound Flagler Lane. Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to long-term parking on the campus and as such, would not be a primary entrance. The transportation studies prepared by Fehr & Peers did not identify any geometric design or other safety hazards associated with the proposed circulation scheme.

*Comment JE1-6*

The comment requests a revision to Figure 2-10 to include the name of Beryl Street. The comment also requests that Towers Elementary School and parents be notified of Project construction and hauling. Beryl Street is currently labeled on Figure 2-10 and no edits to this figure are required. With regard to notification of construction and hauling activities, as part of MM NOI-1 described in Section 3.11, *Noise*, BCHD shall be required to distribute notices to residents and property owners prior within a 0.25-mile radius prior to initiation of construction activities. It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the construction haul routes.

*Comment JE1-7*

The comment asserts, without substantial evidence or expert opinion, that concrete dust, asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyl (PCBs), and mold could have adverse on nearby sensitive receptors . Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue. As described in Section 3.8, *Hazards and Hazardous Materials*, hazardous building materials were identified in the Phase I Environmental Site Assessment (ESA) as having the potential to occur based on the age of the buildings. However, Mitigation Measure (MM) HAZ-1 requires BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and potentially the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable BMPs, related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. The implementation of these measures described in MM HAZ-1 would ensure that impacts to the sensitive receptors identified in the comment would be less than significant.

*Comment JE1-8*

The comment asserts that the EIR fails to identify the high school track teams which use Del Amo to run westward to practice, as well as many other surface streets, as a potential receptors to air pollution. However, as stated in Section 3.2, *Air Quality*, a total of 11 schools were identified with within 0.5 miles (2,640 feet) of the Project site. These include: Beach Cities Child Development Center (preschool), Towers Elementary School, Beryl Heights Elementary School, Redondo Shores High School, Redondo Beach Learning Academy, Redondo Union High School, Jefferson Elementary School, Parras Middle School, Our Lady of Guadalupe School, Valor Christian Academy, and West High School. There are also many public parks in the vicinity, including Dominguez Park, Sunnyglen Park, Entradero Park that are presented in Table 3.2-4. All of these uses, as well as the activities they support (e.g., sports teams and practices), are considered to be sensitive to construction emissions during construction activities associated with the Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to the analysis of air quality impacts on these nearby sensitive receptors.

*Comment JE1-9*

The comment requests clarification on whether the anticipated 170 new jobs created by the Project would be part-time or full time. As discussed in Section 3.12, *Population and Housing* as well as Section 4.4, *Growth Inducing Impacts*, the proposed Project is expected to employ 170 full-time equivalent employees.

*Comment JE1-10*

The comment notes that the EIR incorrectly states that the Providence Little Company of Mary Medical Institute Building is described as being 4 stories in height in Section 3.1, *Aesthetics and Visual Resources*. This single reference to the 4-story Providence Little Company of Mary Medical Institute Building has been revised for consistence with the Section 2.0, *Project Description* as well as the remainder of Section 3.1, *Aesthetics and Visual Resources*. It should be noted that this administrative correction does not affect the impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*. The comment further states that it should be clarified that the Beach Cities Health Center is 4 stories above ground and 1 story below ground. However, the Beach Cities Health Center building is in fact 5 stories above ground, and includes 2 below ground levels. The EIR correctly characterizes the Beach Cities Health Center building as being 5 stories in height.

*Comment JE1-11*

The comment requests that the EIR include analysis of how the Project would affect afterschool practices held at the Towers Elementary School, as well as nearby homeowners that have invested money to install solar. Section 3.1.1, *Environmental Setting* describes the existing solar collectors atop single-family residences located in the neighborhood to the east of the Project site. These residences are included in the list of shade-sensitive receptors considered in Impact VIS-4. As described in Impact VIS-4 shadow-sensitive land uses adjacent to the Project site consist of residential buildings, including windows and private yards at most houses, Towers Elementary School to the east, and Dominguez Park to the northeast. The vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the campus and the Torrance residences below. Shadow-sensitive uses, including the existing residences and associated rooftop solar collectors, to the east of the Project site would not be shaded by the proposed structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be less than significant. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to the shade and shadow analysis.

*Comment JE1-12*

The comment expresses concern regarding the compatibility of the proposed Project with surrounding development with regard to aesthetics. The expresses disagreement, without substantial evidence, with findings of the EIR. The comment does not challenge any specific aspects of the thresholds, methodologies, or impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*, which is supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Consistent with CEQA Guidelines Section 15204(b), *"if persons…believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant."* Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment JE1-13*

The comment requests that the EIR provide heights and growth rates of any foliage/trees to be planted under the Project, and states that many of the trees listed are slow growth trees that would not mitigate the aesthetic impacts of the proposed Project. As described in Section 2.5.1.1, *Proposed Uses*, the perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees consistent with the Torrance Street Tree Master Plan that are adapted to the climate of Southern California. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening. As further described in Section 2.5.1.1, *Proposed Uses*, perimeter green space and landscaping would be intended to soften the campus interface and provide connections with the surrounding uses. Therefore, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts. However, while the landscaping would obscure the proposed building, the finding of less than significant impacts does not rely on landscaping alone. Refer to Mater Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding the analysis of impacts on aesthetics and visual resources.

*Comment JE1-14*

The comment states that the 8.5 story parking structure would create shade for the Torrance neighborhood, and the EIR should describe how shade would impact surrounding neighborhoods. Refer to Mater Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding the analysis of shade impacts on surrounding neighborhoods. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-4, *"[a] shade and shadow study was also prepared for the Phase 2 development assuming a maximum height of the parking structure of 81 feet (see Appendix M). As with the Phase 1 development, shadow-sensitive uses would not be affected by shadows from structures developed under Phase 2 for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October) shade and shadow impacts would be less than significant."*

Comment JE1-15

The comment asserts that the EIR filed to consider or address impacts associated with drivers who speed through nearby intersections and along local streets. However, contrary to the commenter's assertion, Section 3.14, *Transportation* also provides a detailed analysis of potential operational

design hazards and accident potential. As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation impacts.

*Comment JE1-16*

The comment requests that the EIR present an additional alternative involving the passage of a bond or slight membership increase for classes offered by the Healthy Living Campus that would address the financial shortfall of BCHD. However, it should also be noted that the EIR does consider Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space), which contemplates placing a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. However, the success of a local bond measure is speculative, particularly given the history of recent bond measure initiatives in the South Bay.

*Comment JE1-17*

The comment restates concerns that the proposed Project is too tall, providing contrasting examples of the Oakmont and Kensington Assisted Living facilities, which are 2 stories and 3 stories respectively. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building heights and visual character.

**Letter JE2**

June 9, 2021
James Ecklund

*Comment JE2-1*

The comment expresses general concerns regarding the projected energy demand for the proposed Project. As discussed in Section 3.5, *Energy*, the estimated energy demand is conservative in that it does not account for the sustainability features described for the proposed Project including photovoltaic solar panels, solar hot water systems, high efficiency heating, ventilation, and air conditioning (HVAC) systems, etc. (refer to Section 2.5.1.5, *Sustainability Features*). The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental

Design (LEED) Gold Certification. LEED is a national certification system developed by the USGBC to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. Therefore, consistent with the conclusions in Impact EN-1, the proposed Project would not result in wasteful or inefficient use of energy.

*Comment JE2-2*

The comment requests the EIR include an analysis of impacts of the proposed Southern California Edison (SCE) Substation. Refer to Master Response 12 – Noise Analysis. As described therein, according to the National Electrical Manufacturers Association (2014) and Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50 feet, which is well below the ambient $L_{dn}$ noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed substation would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment.

As described in Section 2.5.1.4, *Utilities and Services*, the proposed Project design for the electrical distribution system includes a SCE Substation Yard, medium voltage distribution system, and generator yard, which would be located along the south end of the Project site. Additionally, views of this utility area would be screened from residences to the south by large shade trees.

*Comment JE2-3*

The comment suggests updating Table 3.5-1 to include 2018 electricity consumption for the City of Redondo Beach, given that 2018 data is presented for the County of Los Angeles. As noted below Table 3.5-1 and described in Section 3.5.1, *Environmental Setting*, the most recent publicly available data for the Redondo Beach and Torrance is provided in the Redondo Beach and Torrance Energy Efficiency Climate Action Plans (EECAPs), which include data from 2012.

The comment again expresses concern regarding the projected energy demand for the proposed Project. Refer to the individual response to Comment Response JE2-1.

*Comment JE2-4*

The comment characterizes the EIR as misleading, citing the fact that the projected energy demand presented in Section 3.5, *Energy* does not include sustainability features and the labels for the electrical yard in different figures. The EIR considers a worst-case scenario of the potential energy demand of the proposed Project to provide a conservative analysis. Regarding the labels for the

electrical yard in different figures, this is not meant to be misleading. Rather, the numbering of features on the figures is based on the number of features included in the figure. The electrical yard is clearly labeled on all figures included in the EIR.

The comment also claims the EIR contains non-pertinent information regarding California's electricity generation data. This information is pertinent to the analysis of energy impacts as it provides a description of the energy consumption per capita in California.

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**Letter JH**

May 25, 2021
Jack Holman

*Comment JH-1*

The comment provides a slight grammatical correction to a previously made comment on the Environmental Impact Report (EIR) and expresses continued opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter JB1**

June 9, 2021
Jay Bichanich
Torrance Homeowner and Resident

*Comment JB1-1*

The comment expresses concern over noise created by construction-related vehicle trips – particularly truck trips – during construction activities associated with the proposed Project. The EIR includes thoroughly quantifies and discloses these temporary, but prolonged construction-related impacts in Section 3.11, *Noise*. As described under Impact NOI-1 haul trucks typically generate traffic noise levels of 85 dBA $L_{max}$ at 50 feet. Temporary construction-related trips would increase daytime noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). Noise contributions from these haul truck trips would be imperceptible (i.e., less than 3 dBA). In addition, the Construction Traffic and Access Management Plan under MM T-2, would require that construction haul trucks avoid residential neighborhoods to the maximum extent feasible, which would reduce roadway noise levels during construction. It should also be noted that haul trucks would be used during site clearing and demolition phases as well as during

excavation of the subterranean levels of the proposed Residential Care for the Elderly (RCFE) Building during Phase 1 as well as the parking structure during Phase 2. The proposed Project would result in up to 78 heavy truck trips per day over a 30-week period in Phase 1 and up to 30 heavy truck trips per day over a 35-week period in Phase 2. These impacts would not persist for a continuous period of 5 years as stated in the comment. Refer to Master Response 12 – Noise Analysis for additional discussion related to the quantification and assessment of noise impacts provided in Section 3.11, *Noise*.

*Comment JB1-2*

The comment expresses concern over increases in ambulance trips associated with the proposed Assisted Living units and Memory Care units. This issue is discussed at length in Section 3.11, Noise and Section 3.13, *Public Services*. Phase 1 of the proposed Project would incrementally increase the total number of individuals requiring ambulance services through the overall addition of 177 new Assisted Living bed spaces to the existing 120 Memory Care bed spaces, bringing the total permanent residents supported at the site to 297. Based on an assumed average of 0.82 annual calls per bed space per year to the existing campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under the Phase 1 preliminary site development plan, it is anticipated that the BCHD campus would generate an estimated 244 ambulance calls per year. While estimated emergency calls would increase by 149 percent, all responses would be sporadic and not all would require use of sirens, as a majority of these calls are related to medical situations that do not always require an emergency response. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic. Thus, given the infrequent and short duration of siren utilization responding to emergency situations, noise impacts from emergency vehicles would be both negligible and less than significant. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions that increased ambulance visits would result in persistent sirens blaring.

The comment also asserts that the proposed Project would result increased tenant visitor traffic and congestion on neighboring streets. Refer to Master Response 13 – Transportation Analysis for further discussion on potential transportation impacts related to operational vehicle trips and cut through traffic. Both of these issues are addressed as a part of a comprehensive trip generation analysis associated with the proposed Project. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions that proposed Project would result increased tenant visitor traffic and congestion on neighboring streets.

*Comment JB1-3*

The comment expresses concern over impacts to property values of nearby residences. As described in Section 3.0, E*nvironmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]). Potential property value loss in and of itself is a not physical impact required to be evaluated in a CEQA-compliant analysis. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

*Comment JB1-4*

The comment states that the proposed Project would not fit the character of the surrounding neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further discussion on the height and sized of the proposed RCFE Building as well as the compatibility with the surrounding neighborhood.

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**Letter JS1**

June 4, 2021
Jaysen Surber

*Comment JS1-1*

The comment provides a general statement of opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter JW**

March 21, 2021
Jeff Widmann
414 Sierra Vista drive
Redondo Beach, 90277

*Comment JW-1*

The comment offers empathy regarding the challenge of drafting the Environmental Impact Report (EIR). This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment JW-2*

The comment requests development of a 25-yard long multi-lane swimming pool as part of the proposed Aquatics Center in Phase 2 of the proposed Project. Again, this comment does not address the adequacy of the EIR; however, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. As described in Section 2.5.2.1, *Proposed Uses*, the outdoor portion of the Aquatics Center could include an outdoor pool that would be designed for fitness activities such as lap swimming, aquatic fitness classes.

*Comment JW-3*

The comment expresses support for the proposed Project and the EIR. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter JS2

April 13, 2021
Jennifer Sams

*Comment JS2-1*

The comment provides a general statement of opposition to the proposed Project, due to the size and scope of the Project and its compatibility with the surrounding residential neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining to building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment also expresses general concern, without substantial evidence, regarding air emissions noise, and traffic associated with the proposed Project. These issues are addressed in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment JS2-2*

This comment expresses concern for the loss of privacy for the residents in the West Torrance neighborhood to the east of the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining privacy concerns. As discussed therein, the existing campus, which was originally developed in 1958, currently provides views across the single-family residential neighborhood to the east as a result of the existing topography (i.e., the campus ground level is approximately 30 feet higher than the ground level in the adjacent neighborhood). Many of the backyards in the first row of residences adjacent to the Beach Cities Health District (BCHD) campus are visible from the fourth and uppermost floor of the Beach Cities Health Center under existing conditions. As described in Section 1.0, *Introduction*, the proposed RCFE Building would be sited along the northern perimeter of the BCHD campus behind the Redondo Village Shopping Center. This proposed siting located reduces the proposed building massing along the eastern boarder of the campus adjacent to the single-

family residential neighborhood within the City of Torrance. While residential areas would still be visible from some areas of the campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

*Comment JS2-3*

The comment claims, without substantial evidence, that adjacent residents would be forever in shadow. The comment does not acknowledge the extensive aesthetics impact analysis of this issue provided in Section 3.1, *Aesthetics and Visual Resources*, supported by the preparation of a detailed shade and shadow study by a licensed architect. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining to shade and shadow impacts.

*Comment JS2-5*

The comment expresses general concerns, without substantial evidence or expert opinion, about traffic and air pollution during the construction period. The comment also claims, again without substantial evidence or expert opinion, that student learning would be affected. These issues are addressed in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. However, while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17).

It should also be noted that the comment incorrectly states that demolition and construction would occur for a period of 5 to 10 years. For clarification while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years.

*Comment JS2-5*

The comment questions the benefits of the Project for residents of Torrance and suggests development of the Project in an alternative location. Refer to Master Response 3 – Project Need and Benefits for a detailed discussion and response to comments pertaining to the benefits of the proposed Project. Regarding potential alternative locations for the proposed Project, Section 5.4, *Alternatives Considered but Rejected from Further Analysis* explorers the requirements for potential alternate sites. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development.

*Comment JS2-6*

The comment again expresses opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter JM

March 30, 2021
Jim Mooney
1022 Fourth Street
Hermosa Beach, CA 90254

*Comment JM-1*

The comment asserts that North Prospect Boulevard is already overwhelmed with PCH-diverted traffic, especially during rush hours and that other intersections in the Project vicinity are overcrowded, especially during commute times. The comment continues with anecdotal evidence of traffic accidents and pedestrian-vehicle safety conflicts.

First, it should be noted that pursuant to Senate Bill (SB) 743 and California Environmental Quality Act (CEQA) Guidelines Section 15064.3, vehicle miles travel (VMT) has replaced roadway capacity-based or automobile delay-based level of service (LOS), as the metric for transportation impact analysis (refer to Section 3.14, *Transportation*). Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and intersted residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the BCHD campus (when most cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods, with no measurable increase in cut-through traffic forecasted by the study.

Section 3.14, *Transportation* also provides a detailed analysis of potential operational design hazards and accident potential. As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation impacts.

*Comment JM-2*

The comment expresses opposition to the density of the proposed Project considering the already crowded beach community. It should be noted that the comment fails to acknowledge the detailed analysis of potential impacts to population, housing, and employment provided in Section 3.12, *Population and Housing*. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment JM-3*

The comment expresses opposition to the size of the Project and claims the Project would result in 15 years of construction. First, it should be noted that the comment incorrectly states that demolition and construction would occur for a period of 15 years. For clarification while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years.

The only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. All other potential impacts identified in the EIR – including impacts to transportation – were determined to be less than significant or less than significant with the implementation of required mitigation measures. the EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.) Each of the conclusions provided in the EIR – including the disclosure of the significant and unavoidable construction-related noise impacts – is supported by substantial evidence, technical studies, and/or exhaustive quantitative modeling efforts prepared by experts in their field.

*Comment JM-4*

The comment suggests development of the Project in an alternative location and expresses opposition to the Project. Regarding potential alternative locations for the proposed Project, Section 5.4, *Alternatives Considered but Rejected from Further Analysis* explorers the requirements for potential alternate sites. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter JL**

June 9, 2021
Jingyi Li

*Comment JL-1*

The comment provides a general statement of opposition to the Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment JL-2*

The comment expresses general concerns, without substantial evidence, regarding construction-related air quality impacts on schools and residents. However, as described in Master Response 10

– Air Quality Analysis, impacts related to dust and other criteria pollutant emissions would be less than significant with mitigation. The construction emissions associated with Phase 1 and Phase 2 of the proposed Project were estimated using the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod), as prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

*Comment JL-3*

The comment asserts that the buildings included as part of the proposed Project would block sunlight and views for each and every house from all directions. The comment does not acknowledge the extensive aesthetics impact analysis of this issue provided in Section 3.1, *Aesthetics and Visual Resources*, supported by the preparation of a detailed shade and shadow study by a licensed architect. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining to shade and shadow impacts.

*Comment JL-4*

The comment claims that the Project would result in an increase in traffic that would make everyone's commute substantially longer and more difficult. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to operational vehicle trips. As described therein, implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). After completion of Phase 2, the proposed Project would generate a net increase of 376 new daily trips as compared with existing conditions. While operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing trip generation at the Beach Cities Health District (BCHD) campus. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the BCHD campus (when most cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times.

*Comment JL-5*

The comment expresses appreciation for the commercial uses in the Redondo Village Shopping Center and requests that these uses not be taken away. The proposed Project would not result in the demolition or removal of any of the uses located in the Redondo Village Shopping Center,

which is located adjacent to the north of the Project site. Refer to Figure 2-2 for a depiction of the Project site boundaries.

*Comment JL-6*

The comment again expresses opposition to the Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter JD1**

Joan Davidson
1525 Via Arco
Palos Verdes Estates, CA 90274

*Comment JD1-1*

The comment claims that the Environmental Impact Report (EIR) should have used the AERMAP for terrain processing in AERMOD. However, the construction Health Risk Assessment (HRA) was conducted in accordance with the South Coast Air Quality Management District (SCAQMD) and California Office of Environmental Health Hazard Assessment (OEHHA) guidance. The AERMOD dispersion model conservatively modeled all sources and receptors at zero elevation pursuant to SCAQMD's guidance, which recommends that if all receptor elevations are lower than the base elevation of the source, dispersion modeling should assume the non-default flat terrain option. Modeling the sensitive receptors at elevations below the Project site, as suggested by the comment, would result in a less conservative analysis showing a reduction in exposure.

*Comment JD1-2*

The comment claims the meteorological data used for the dispersion modeling conducted for the proposed Project is not valid given that this data was collected from the Hawthorne Airport Meteorological Station (Station ID 3167) between 2012 and 2016. It should be noted that there are 24 meteorological stations throughout the South Coast Air Basin. The SCAQMD published AERMOD-ready meteorological data from these stations here: https://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod. As clearly described in the HRA, the data used in the AERMOD analysis is the most recently available meteorological data from the meteorological station nearest the Project site. Therefore, the use of this data is consistent with SCAQMD and

OEHHA guidance. The comment fails to describe why this data is invalid or suggest another SCAQMD-approved data source.

**Letter JD2**

June 10, 2021
Joan Davidson
1525 Via Arco
Palos Verdes, CA 90274

*Comment JD2-1*

The comment requests confirmation of receipt of both emails. Both of these emails have been received and comments included therein as well as responses to these comments have been incorporated into the Final Environmental Impact Report (EIR) as a part of the response to comments.

*Comment JD2-2*

The comment describes the historical use of a pond in Dominguez Park as a sewage evaporation area. The comment asserts that the EIR does not determine whether the former pond located on-site between 1924 and 1947 was used for similar purposes and whether the pond resulted in hazardous chemicals and potentially sewage wastes on-site. The EIR thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). As described in Table 3.8-1, the pond was located on the Project site during a period of time when it was developed for agricultural uses. While neither the Phase I nor the Phase II ESA could determine the exact purpose of the pond, the Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants. Three of the screened contaminants were detected in excess of their residential screening levels: tetrachloroethylene (PCE), benzene, and chloroform. All three of these contaminants are classed as volatile organic compounds (VOCs). No indictors of sewage wastes were identified in the sampling effort.

The comment requests additional information regarding the source of the former pond on-site given that groundwater was not encountered to a maximum of 30 feet below ground surface (bgs) during soil borings, as well as its potential effects on environmental and geologic hazards, including ground stability. The comment goes on to claim that the EIR does not analyze the land subsidence at Dominguez Park and whether this is a similar possibility of instability or subsidence at the Project site. It should be noted that the former pond, whatever its purpose, was removed and graded over 70 years ago and the Project site has been graded and developed to support the existing

BCHD campus buildings. Existing geologic and soils hazards at the Project site, including but not limited to liquification, landslides, slope instability, subsidence, and differential settlement, were thoroughly assessed based on the Geotechnical Report prepared by Converse Consultants (2016) and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation, and California Emergency Management Agency (Cal EMA). The issue of geologic hazards is discussed in detail in Section 3.6, *Geology and Soils* under Impact GEO-1, which describes that the Project site is not located within a designated liquefiable area mapped by the State or the Redondo Beach Local Hazard Mitigation Plan Liquefaction Zones Map. Additionally, the Geotechnical Report prepared for the proposed Project categorizes the underlying soils as silty and clayey sands with low risk of liquefaction. Therefore, required compliance with the California Building Code (CBC) would ensure that potential impacts associated with liquefaction would be less than significant. Further, the proposed Project would not be located on an unstable geologic unit or soil that is made unstable as a result of the proposed Project or an expansive soil creating a substantial risk to life or property. Compliance with all applicable State and local regulations as well as the recommendations of the Geotechnical Report as required by Mitigation Measure (MM) GEO-1 would ensure that potential impacts associated with geologic and soil hazards would be less than significant.

*Comment JD2-3*

The comment incorrectly asserts that the EIR does not describe the former landfill at 200 Flagler Lane and the resulting potentially hazardous contamination. The former landfill is described in detail in the Phase I ESA and Section 3.8.1, *Environmental Setting*. As described therein, *"[t]his landfill operated from 1904 to 1967, during which time it accepted 'inert, residential' waste. The landfill was closed and underwent cleanup beginning in January 1989, after which it was issued a 'completed-case closed' designation by the Los Angeles RWQCB on October 1, 2012. The property is currently developed as Dominguez Park..."* As previously described, the EIR thoroughly discloses and discusses the existing conditions on the Project site, including the potential for hazardous soil and soil vapor contamination beneath the site, which was informed by the completion of Phase I and Phase II ESAs, a firm with decades of experience preparing environmental due diligence studies for development projects across California.

*Comment JD2-4*

The comment contends that the known contamination on-site could result in health impacts that have not been addressed by the EIR. However, contrary to the commenter's assertion, the EIR

thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II ESAs. The Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants. Three of the screened contaminants were detected in excess of their residential screening levels: PCE, benzene, and chloroform.

While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, *Hazards and Hazardous Materials*). The implementation of MM HAZ-2a through -2d would ensure that PCE and the other identified VOCs – including benzene and chloroform, which were detected in limited areas – are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through -2d impacts would be less than significant.

The comment goes on to assert, without substantial evidence or expert opinion, that it is unlikely the PCE contamination beneath the Project site traveled approximately 600 feet from the former dry cleaners and requests that the EIR prove the source of this contamination is from the dry cleaners rather than the existing campus. It should be noted that the former dry cleaner at 1232 Beryl Street is located approximately 70 feet away from the northern perimeter of the Project site and approximately 290 feet away from the vacant Flagler Lot. As described in Section 3.8.1, *Environmental Setting*, the Phase II ESA determined that the former dry cleaner that operated at the Redondo Village Shopping Center is suspected to be a source of PCE soil contamination at the Project site and the neighboring properties. Beginning in the mid-1930s, the dry cleaning industry began to use PCE as a primary solvent due to its cleaning power and compatibility with most clothing.

With regard to long-term remediation activities, as described in Section 3.8.1, *Environmental Setting*, BCHD has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling

results and identify the responsible party. As the Certified Unified Program Agency (CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup.

*Comment JD2-5*

The comment claims that although the Los Angeles RWQCB issued a completed-case close designation for the Leaking Underground Storage Tank (LUST) case, there is no determination that the Project site is appropriate for residential development. As described in Section 3.8.1, *Environmental Setting*, it should be noted that the LUST case was associated with the Shell gas station located at 1200 Beryl Street, which was originally listed as a cleanup site due to gasoline contamination. Soil sampling conducted as a part of the Phase II ESA did not identify any indictors of contamination on the Project-site as a result of this previously closed LUST case.

The comment goes on to assert that the EIR does not provide information regarding the human health concerns associated with the previously plugged and abandoned oil and well. However, contrary to the commenter's assertion, the EIR clearly describes potential hazards associated with the previously plugged and abandoned oil and gas well. As described in Section 3.8.1, *Environmental Setting*, Total Petroleum Hydrocarbons (TPH) in the heavy oil range was detected in two samples at boring locations within the vacant Flagler Lot at concentrations of 20.9 and 123 milligrams per kilogram (mg/kg), respectively, which are well below the Department of Toxic Substances Control (DTSC) and U.S. Environmental Protection Agency (USEPA) residential screening level of 180,000 mg/kg. In September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities.

The comment expresses general concerns, without substantial evidence or expert opinion, regarding airborne PCE contamination – particularly with respect to the schools and residents in the vicinity of the Project site as well as workers and visitors on-site – and incorrectly states that these issues are not addressed in the EIR. As previously described in response to Comment JD2-4, PCE is generally only hazardous when encountered in a confined space where it can exceed the CAA limits and OSHA exposure limits. Exposure to PCE in unconfined spaces presents very

limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, *Hazards and Hazardous Materials*). The implementation of MM HAZ-2a through -2d would ensure that PCE and the other identified VOCs are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through -2d impacts would be less than significant.

Previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the campus have not experienced vapor intrusion form subsurface contamination. Further development under the proposed Project would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatized PCE through carbon filters before outgassing the vapor at a controlled rate. Again, because PCE is generally only hazardous when encountered in a confined space where it can exceed the CAA limits and OSHA exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

Finally, the comment briefly asserts that the EIR fails to quantify the diel and other airborne contamination at the four schools within a 0.25-mile radius of the campus. However, contrary to this assertion, exhaustive air quality modeling, including the preparation of a construction HRA was prepared by iLanco to evaluate this issue. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to this issue.

*Comment JD2-6*

The comment notes that the vacant Flagler Lot is unpaved, allowing stormwater to infiltrate into the ground and states the EIR fails to determine how the infiltration would reach 600 feet away at BC 1 and BC 2 borings. It is not clear what is meant by this comment. It should also be noted that

soil boring B-1 is located approximately 210 feet from the vacant Flagler Lot and B-2 is located approximately 765 feet from Flagler Lot.

The comment goes on to assert that the EIR fails to conduct a comprehensive study of the water table that is the top level of groundwater and that the EIR fails to analyze the effects of construction, runoff, and future use of BCHD on the contamination of groundwater . Publicly available references for Well ID #725J, State #4S14W08E03, and the Lofty Engineering (1997) report could not be located and were not provided as a part of the comment. However, soil borings were collected as a part of the Phase II soil sampling as well as the Geotechnical Report prepared for the proposed Project. Neither sampling effort identified groundwater. Additionally, as described further in the Geotechnical Report, which was prepared by a registered professional geologist, groundwater is not anticipated to be encountered during construction.

Other issues related to groundwater hydrology and groundwater quality are discussed in detail in Section 3.9, *Hydrology and Water Quality*. The effects of construction and operation of the proposed Project related to stormwater runoff and surface water and groundwater quality are thoroughly disclosed and discussed under Impact HYD-1 and Impact HYD-3 in Section 3.9, *Hydrology and Water Quality*. As described therein, construction activities have the potential to contribute to polluted stormwater runoff due to the major earthwork, which would disturb the underlying soils and expose them to potential erosion and mobilization, as well as from delivery, handling, and storage of construction materials and wastes, as well as potential leakage and spills of construction materials (e.g., oil, grease, paints, solvents, or cleaning agents). During storm events, these contaminants on the Project site have the potential to be washed away by stormwater runoff and carried into the existing storm drain system. Potential adverse effects on water quality associated with construction activities would be reduced through compliance with the requirements of the Construction General Permit (State Water Resources Control Board [SWRCB] Order No. 2009-0006-Data Quality Assessment). Prior to beginning any demolition, grading, or construction activities, BCHD must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent (NOI) and a Stormwater Pollution Prevention Plan (SWPPP) for review and approval by the Los Angeles RWQCB. In accordance with the Stormwater Management and Discharge Control Ordinance, the best management practices (BMPs) developed for the proposed Project would also be incorporated into a Standard Urban Storm Water Mitigation Plan (SUSMP) to be approved by the Redondo Beach Department of Public Works (DPW) Engineering Services Division and Torrance Public Works for the construction activities occurring within the City of Torrance right-of-way. The SUSMP would require that BMPs minimize pollutants and reduce stormwater runoff to levels that comply with applicable water quality standards. Implementation of BMPs developed in accordance with the

requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of the proposed Project. Therefore, construction-related impacts to water quality would be less than significant.

With regard to operational impacts to water quality, the overall net reduction in impervious surface areas associated with the proposed Project compared to existing conditions would reduce the potential for pollutants (e.g., leaking oil, gas, grease, metals, organics, pesticides, and non-chemical pollutants such as trash, debris, and bacteria) to be discharged during storm events. Additionally, Phase 1 of the proposed Project would involve the construction of an infiltration 85$^{th}$ system designed to retain, treat, and infiltrate the 85$^{th}$ percentile storm. Any flows larger than the 85$^{th}$ percentile design storm would be conveyed to North Prospect Avenue. The proposed Project would be subject to Federal, State, and local regulations pertaining to operational water quality, including the Redondo Beach Stormwater Management and Discharge Control Ordinance. Therefore, BCHD would be required to prepare and implement a SUSMP through the operational life of the proposed Project. Prior to issuing approval for final occupancy, BCHD would be required to provide an operation and maintenance plan, monitoring plan, where required by the Los Angeles Basin Plan, and verification of ongoing maintenance provisions for LID practices, Treatment Control BMPs, and Hydromodification Control BMPs including but not limited to: final map conditions, legal agreements, covenants, conditions or restrictions, and/or other legally binding maintenance agreements. Verification at a minimum shall include a BCHD-signed statement accepting responsibility for maintenance until the responsibility is legally transferred.

Therefore, following completion of the proposed Project, stormwater runoff from the Project site would not directly affect water quality in the Santa Monica Bay or local groundwater. Compliance with all applicable State and local regulations would ensure that operational impacts to water quality would be less than significant.

*Comment JD2-7*

The comment again questions why trace amounts of PCE was detected in soil boring B-2. Refer to Comment Response JD2-4.

*Comment JD2-8*

The comment claims that the EIR does not investigate the effect on the ocean and water ways in the region. Refer to the response to Comment Response JD2-6.

*Comment JD2-9*

The comment misrepresents the exhaustive quantitative analysis in the construction HRA by stating that the EIR fails to consider the human health risks of students at Towers Elementary School. As described in Section 3.2.3, *Impact Assessment and Methodology*, the dispersion modeling was conducted to estimate ground-level diesel particulate matter (DPM) concentrations for the point of maximum impact (PMI) and for the maximum exposed individual resident (MEIR). The PMI is the location where the cancer risk or non-cancer chronic health effect is maximum, regardless of the presence of a human receptor at that location. No concentration higher than the PMI would occur from the proposed construction activities. As described in detail within the EIR and the construction HRA, with the implementation of all required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts at the PMI and MEIR would be less than significant when compared to the SCAQMD thresholds. Because the four schools are located at a much greater distance than the PMI and MEIR, they would experience less exposure and impacts would be similarly less than significant when compared to the SCAQMD thresholds. Refer to Master Response 10 – Air Quality Analysis.

*Comment JD2-10*

The comment again misconstrues the EIR, by stating that the EIR does not adequately assess human health impacts from Project construction given that the HRA and incorrectly states that $PM_{10}$ is used to replace $PM_{2.5}$ *exposures.* As described in Section 3.2.3, *Impact Assessment and Methodology*, the HRA was conducted in accordance with SCAQMD and OEHHA guidance. As described in the EIR and the construction HRA, OEHHA guidance specifically indicates that $PM_{10}$ to be used as a surrogate for the DPM when evaluating health risks.

It is important to note that $PM_{2.5}$ is a subset of $PM_{10}$. Therefore, the analysis of $PM_{10}$ emissions provided in the EIR and the associated construction HRA, which was prepared in accordance with OEHHA methodology, inherently does include an analysis of all particulate matter smaller than 10 microns.

*Comment JD2-11*

The comment expresses general concerns regarding diesel truck emissions associated with the proposed Project, particularly the effects on students at the schools in the Project vicinity. Refer to Comment Response JD-9. Again, the construction HRA very strictly follows SCAQMD and OEHHA guidance and conservatively analyzes the dominate pollutant (i.e., DPM) that would be emitted in closest proximity to the receptors.

*Comment JD2-12*

The comment provides an overview of potential health impacts associated with DPM, with references to various articles on the subject. However, as described in the individual responses to Comment JD2-8 through JD2-11, the construction-related DPM emissions were quantified in accordance with SCAQMD and OEHHA guidance, appropriately compared against SCAQMD thresholds, and found to be less than significant. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to this issue.

*Comment JD2-13*

The comment asserts that a three-dimensional airborne noise analysis should be conducted to completely assess the impact of Project generated noise on the residents surrounding the Project site. The comment implies that the noise analysis conducted for the proposed Project as presented in Section 3.11, *Noise* included hand calculations and rough estimates with spreadsheets containing endless tables of data. However, construction noise levels at on- and off-site locations were estimated using the FHWA Roadway Construction Noise Model where inputs included distance from construction equipment to receptor, equipment types, and usage factor, which is presented as a percentage of the equipment operating at full power within a given time frame. This is a standard practice for noise modeling within the City of Redondo Beach. Neither of the City of Redondo Beach nor the City of Torrance have prepared recent CEQA documentation that use SoundPLAN to analyze construction noise. CEQA Guidelines Section 15204 clearly states: *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."* Refer to Master Response 12 – Noise Analysis for detailed discussion and a response to comments pertaining to the quantitative noise modeling, assumptions, and results.

*Comment JD2-14*

The comment states that the EIR should thoroughly investigate the propagation and impact of airborne and ground-transmitted noise from the proposed Project during excavation and construction on the surrounding community and investigate the impact of airborne noise generated by the completed Project on the surrounding community. The EIR thoroughly discloses and discusses the potential airborne and groundborne noise impacts associated with construction and operation of the proposed Project. The exhaustive noise modeling effort – which resulted in the identification of a significant and unavoidable temporary, but prolonged construction-related noise impact – clearly meets the standard of adequacy set out in CEQA Guidelines Section 15151, which states *"an EIR should be prepared with a sufficient degree of analysis to provide decision makers*

*with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure"* (San Francisco Ecology Center v. City and County of San Francisco, (1975) 48 Cal. App. 3d 584).

**Letter JHRC**

March 24, 2021
Josephine Hrzina & Richard Crisa

*Comment JHRC-1*

The comment expresses opposition to the Project due to the duration of construction, air emissions, construction-related noise, and construction traffic. These construction-related impacts are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter JV**

June 9, 2021
Josey Vanderpas

*Comment JV-1*

The comment provides a general statement of opposition to the proposed Project. The comment claims, without substantial evidence, that the noise associated with the proposed Project would result in an increase in tinnitus for residents, creating unbearable discomfort resulting in anxiety.

Again, the comment fails to provide substantial evidence or expert opinion that provides a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR.

*Comment JV-2*

The comment expresses general concerns, without substantial evidence or expert opinion, regarding health impacts associated with dust emissions and release of hazardous materials resulting during Project construction. The comment fails to acknowledge the exhausting modeling effort of criteria air pollutant and toxic air contaminant (TAC) emissions associated with the proposed Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to particulate matter emissions as well as other criteria air pollutant emissions and TACs. As described therein impacts associated with temporary, but prolonged construction-related impacts are addressed in Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of Mitigation Measure (MM) AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation.

Similarly, the comment does not acknowledge the robust sampling effort and analysis of hazardous materials on-site provided in Section 3.8, *Hazards and Hazardous Materials*. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and responses to comments on this issue.

It should also be clarified that the construction associated with Phase 1 would occur over approximately 29 months and construction associated with Phase 2, which would occur over approximately 28 months, would not begin until 2029, approximately 5 years after the completion of Phase 1.

**Letter JS3**

May 27, 2021
Joyce and John Stauffer
19411 Linda Dive
Torrance, CA 90503

*Comment JS3-1*

This comment asserts that the development associated with the proposed implementation of the Healthy Living Campus Master Plan would be wholly incompatible with the surrounding neighborhood and disruptive for the location. The comment asserts that completed construction is 300 percent larger than what currently exists, but provides no methodology for how that conclusion has been reached. As described in Table 1-2 the existing campus has a total occupied building area of 260,400 square feet (sf). Under the proposed Project, the total occupied building area would be 484,900, representing an increase of approximately 86 percent. Additionally, the existing Beach Cities Health Center reaches a maximum height of 5 stories. Under the proposed Project the proposed Residential Care for the Elderly (RCFE) Building would reach a maximum height of 7 stories. Importantly, as described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, it should also be noted that the height of the proposed RCFE Building was adjusted from a maximum of 4 stories to a maximum of 7 stories in order to avoid locating portions of the building along the eastern boundary of the campus. This revision represents an effort to: 1) concentrate the majority of the building mass along Beryl Street, with a setback and step-down in building height provided by the Redondo Village Shopping Center; and 2) address construction-related concerns associated with the adjacency of the proposed RCFE Building to the residential neighborhood within the City of Torrance.

The comment states that the RCFE Building would be the tallest building in all three of the beach cities and would be highly visible given that the campus is located approximately 30 feet above street level. This issue is identified (refer to Table 3.1-1) and fully addressed under Impact VIS-1, which identifies a potentially significant impact to scenic views of the Palos Verdes ridgeline from Flagler Lane & 190$^{th}$ Street. For issues related to building height and visual character refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

The comment also asserts that the proposed RCFE Building constructed during Phase 1 and the proposed parking structure construction during Phase 2 would reduce sunlight, cast along shadows, and impact the privacy of homes in all directions. However, the comment does not challenge any specific aspect of the analysis provided in Section 3.1, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support its assertions. These issues are thoroughly discussed in Master Response 9 – Aesthetics and Visual Resources Analysis.

*Comment JS3-2*

The comment correctly summarizes the analysis of potential noise impacts provided in Section 3.11, *Noise* of the EIR. This comment has been received and incorporated into the Final EIR as a

part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

*Comment JS3-3*

The comment asserts that increased traffic, congestion, sand safety issues would overwhelm neighborhood streets and impact nearby schools, including West High School and Towers Elementary. Additionally, the comment asserts, without substantiating evidence or expert opinion, that all major surrounding thoroughfares and intersections in the City of Redondo Beach and the City Torrance will be impacted. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to issues related to the duration and timing of construction-related traffic, impacts to safety, and coordination with Torrance Unified School District (TUSD) regarding the construction schedule.

*Comment JS3-4*

The comment incorrectly claims that the proposed Project would expose thousands to hazardous volatile organic compounds (VOCs) and other carcinogens. The comment notes the Project site's location relative to public schools and the detection of tetrachloroethylene (PCE) on-site. The EIR thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Therefore, with the implementation of the mitigation measures identified in the EIR (i.e., MM HAZ-2a through -2d) impacts associated with PCE would be less than significant. Additionally, the air quality analysis provided in the EIR is supported by a Health Risk Assessment (HRA), which determined that with the implementation of the mitigation measures identified in the EIR (i.e., MM AQ-1, which includes a requirement for U.S. Environmental Protection Agency [USEPA] Tier 4 engines), cancer risk and non-cancer health effects would remain below the thresholds established by the South Coast Air Quality Management District (SCAQMD) (refer to Section 3.2, *Air Quality* and Appendix B). Refer to Master Response

10 – Air Quality Analysis and Master Response 11 – Hazards and Hazardous Materials for further discussion and response to these issues.

The comment also notes noise and vibration during construction, but does not challenge any specific aspects of the quantitative noise and vibration modeling provided in Section 3.11, *Noise*, which shows that these schools would not experience noise levels exceeding the established thresholds. Further, the comment does not provide any substantiating evidence supporting its assertions. Refer to Master Response 13 – Noise Analysis for further discussion and response to these issues.

*Comment JS3-5*

The comment incorrectly states the proposed development would be incompatible with the zoning designation of P-CF (Community Facility). The P designation is comprised of lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. The specific purposes of the P Public and Institutional zone regulations are to provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to Beach Cities residents. Implementation of the proposed Project would not substantially alter these land uses. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to this issue.

*Comment JS3-6*

The comment incorrectly states that under the proposed Project, BCHD would gift public land to private developers and criticizes BCHD's use of taxpayer funds and financial operations. It should be noted that the proposed Project would not gift public land to private developers, rather the BCHD would use revenues generated from the proposed Project to re-invest in and continue community health and wellness programming and services in alignment with the mission of BCHD. As described in Section 2.3, *Existing Tenants* BCHD currently uses a similar revenue generation model providing leased space for a variety of mission-oriented tenants. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to this issue.

*Comment JS3-7*

The comment incorrectly states that 80 percent of the target renters are from outside the Beach Cities and only 9 percent of target renters live in Redondo Beach. The market feasibility study prepared by MDS Research Company, Inc. found that approximately 70 percent of residents of the proposed senior housing units would come from the Primary Market Area within a 5-mile radius of the Project site. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to this issue.

*Comment JS3-8*

The comment asserts that implementation of the proposed Project would adversely affect local fire departments capability of responding to calls for service. The EIR includes a thorough assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local fire protection services. As described in Section 3.13, *Public Services* under Impact PS-1, implementation of the proposed Project would incrementally increase the demand for the Redondo Beach Fire Department fire protection and Emergency Medical Services (EMS) services as well as other non-emergency services. Assuming an average of 0.82 annual calls per bed space per year based on the average number of service calls to the existing Beach Cities Health Center, the BCHD campus would generate an estimated total of 244 emergency calls per year following the completion of the proposed development under Phase 1. This would represent an increase in total calls by a factor of approximately 2.5 when compared to the average of 98 calls per year under existing conditions. As described under Impact PS-1 this increase would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, this impact would be less than significant.

*Comment JS3-9*

The comment criticizes BCHD's financial operations. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to this issue as it relates to the proposed Project.

*Comment JS3-10*

The comment states that the South Bay Hospital was exclusively created for use by the Beach Cities. This comment does not deal with any of the technical sufficiency of the EIR or any of the physical environmental impacts identified therein. Nevertheless, this comment has been received

and incorporated into the Final EIR as a part of the responses to comments, and will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

*Comment JS3-11*

The comment express disapproval of BCHD's role as the lead agency and implies that BCHD should seek a public vote for a bond to finance a seismic retrofit of the building. For issues related to BCHD's role as lead agency, refer to Master Response 2 – BCHD as Lead Agency. It should also be noted that the EIR does consider Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space), which contemplates placing a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. However, the success of a local bond measure is speculative, particularly given the history of recent bond measure initiatives in the South Bay.

*Comment JS3-12*

The comment states that Phase 2 development program is currently funded. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to financial issues associated with the proposed Project.

*Comment JS3-13*

The comment asserts that BCHD is not under legal obligation to retrofit the Beach Cities Health Center. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to this issue.

## Letter JC

June 6, 2021
Joyce Choi

*Comment JC-1*

The comment expresses general opposition to the proposed Project, the Environmental Impact Report (EIR), and the timing of the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment goes on to express general concerns regarding air and dust emissions, construction-related noise, and construction traffic. These issues are discussed in detail within Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project. Refer to Master Response 12 – Noise Analysis for a detailed discussion of the potential impacts associated with construction-related noise. Refer to Master Response 13 – Transportation Analysis for a detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project. It should also be noted that the analysis of construction-related air quality emissions, noise levels, and traffic included consideration of construction worker vehicles.

## Letter JB2

June 10, 2021
Judith Bunch

*Comment JB2-1*

The comment asserts that cost of the proposed assisted living facility would not be affordable to local residents. Refer to Master Response 5- Affordability of RCFE Assisted Living and Memory Care Units. Additionally, the comment asserts that BCHD has not listened to public input. As described Section 1.6, Pr*oject Background*, since the inception of the proposed Project in 2017, BCHD has been dedicated to engaging in public outreach, including forming a 20-person Community Working Group (CWG) to represent the various populations and organizations in the Beach Cities and engage local participants in the planning of Project redevelopment. The proposed Project was developed as a result of more than 60 meetings hosted over a 3-year period and attended by more than 550 community members.

*Comment JB2-2*

The comment claims various environmental topic areas – including aesthetics, air emissions, noise, recreation, and traffic – would experience significant impacts under the proposed Project. It should be noted that, as analyzed in the EIR, impacts to aesthetics, air quality, and transportation were either determined to be less than significant, or less than significant with mitigation. A detailed discussion and responses to comments pertaining to aesthetics and visual resources impacts resulting from construction and operation of the proposed Project are provided in Master Response 9 – Aesthetics and Visual Resources Analysis. Impacts associated with air pollutant emissions from construction and operation of the proposed Project are detailed in Master Response 10 – Air Quality Analysis. Noise impacts of both construction and operation of the proposed Project are detailed further in Master Response 12 – Noise Analysis. The impacts associated with vehicle trips, mobility, and transportation safety from construction and operation of the proposed Project are detailed in Master Response 13 – Transportation Analysis. As described in Section 4.5, *Effects Found Not to Be Significant*, because the proposed Project would expand open space and recreational facilities, the proposed Project may substitute the demand for the City's already substantial recreational facilities (e.g., parks, beaches, open space, etc.). Because the proposed Project would not substantially increase demand on recreational facilities, potential impacts to recreational resources would be considered less than significant. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions.

Further, the comment also claims that the EIR is defective but does not identify specific grievances with the EIR or impact analysis, mitigation measures, and alternatives that may not have been sufficiently assessed.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter JS4**

June 9, 2021
Judith Scott
19510 Linda Drive
Torrance, CA 90503

*Comment JS4-1*

The comment asserts that the Draft EIR is deficient in numerous ways but fails to identify any specific shortcomings of the EIR. The comment goes on to assert that the proposed Project is based on outdated (pre-COVID-19) assumptions about the profitability of an Assisted Living facility and claims that the implementation of the proposed Project would risk the financial assurance for existing community health and wellness programs and services. For a detailed discussion and response to comments pertaining to these issues refer to Master Response 3 – Project Need and Benefit, Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, and Master Response 6 – Financial Feasibility/Assurance.

*Comment JS4-2*

The comment asserts, without substantial evidence, that the proposed Project would affect surrounding neighborhood communities with purported impacts on aesthetics as well as construction-related air emissions, noise, and traffic. However, the comment does not challenge any specific aspects of the analysis of aesthetics and visual resources in Section 3.1, *Aesthetics and Visual Resources*, which is supported by supported by more than a dozen photographs as well as detailed computer-generated photosimulations and a shade and shadow study prepared by licensed architects. Similarly, the comment does not challenge any specific aspects of the analysis of construction-related impacts provided in Section 3.2, *Air Quality*, Section 3.11, *Noise*, or Section 3.14, *Transportation*, each of which were supported by exhaustive quantitative modeling by recognized experts in their field. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis, Master Response 10 – Air Quality Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion of the potential Project for a detailed discussion and response to comments pertaining to these issues.

The comment goes on to claim that the EIR requires redrafting to take adequate account of the extensive community concerns. Section 1.6, *Project Background* provides a brief summary of the competing community concerns that were considered during the development of the proposed Healthy Living Campus Master Plan and summarizes the 17 Community Working Group (CWG) meetings to discuss various components of the proposed Healthy Living Campus Master Plan before it was eventually dissolved in December 2020 following the conclusion of the preliminary planning and design phases. BCHD staff also conducted public outreach for the Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan. The claim that the EIR does not consider the extensive community concerns is

unfounded. No substantial evidence has been provided to suggest that any of the triggers for recirculation described under CEQA Guidelines 15088.5 have been met.

**Letter JK**

June 2, 2021
Judy Kamp

*Comment JK-1*

The comment expresses general opposition to the proposed Project and claims that the proposed Project is unnecessary and a waste of taxpayer money. Refer to Master Response 1 – General Opposition as well as Master Response 3 – Project Needs and Benefits for a detailed discussion and response to comments pertaining to these issues.

The comment also asserts, without substantial evidence or expert opinion, that the proposed Project would cause physical harm to people living in the surrounding area as well as traffic congestion. However, the comment does not provide any specifics or details to further clarify these issues. Potential impacts to transportation are described in detail in Section 3.14, *Transportation*, with analysis supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation.

**Letter JD3**

April 13, 202
Julie Dominguez

*Comment JD3-1*

The comment expresses general opposition to the proposed Project and claims, without substantial evidence, that the proposed Project is too big for the surrounding neighborhood. Refer to Master Response 1 – General Opposition. Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to commenters pertaining to compatibility with the surrounding area.

*Comment JD3-2*

The comment general expresses general concern regarding traffic and air emissions associated with the proposed Project, but does not challenge any specific aspects of the analysis of transportation impacts presented in Section 3.14, *Transportation* or the analysis of air quality

impacts to sensitive receptors in Section 3.2, *Air Quality*. Refer to Master Response 13 – Transportation Analysis for detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project. Refer to Master Response 10 – Air Quality Analysis for detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project.

*Comment JD3-3*

The comment asserts that the proposed Project would not provide any benefits to the residents of the neighborhoods surrounding the Project site. Refer to Master Response 3 – Project Needs and Benefits.

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**Letter KY1**

June 10, 2021
Kenneth Yano

*Comment KY1-1*

The comment claims the BCHD has failed to demonstrate that the proposed Project would meet the first project objective: *"Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support current levels of programs and services."* The comment then asserts that BCHD should release a detailed financial assessment verifying the proposed Project would meet revenue objectives before the EIR is approved. The comment goes on to provide its own assessment as to why the proposed Project would not meet revenue goals and therefore, must be dismissed. As further detailed in Master Response 6 – Financial Feasibility/Assurance, BCHD has very clearly and consistently demonstrated that the funding necessary to implement the proposed Phase 1 preliminary site development plan, which is anticipated to cost $235 million, is secured. These funds consist of revenue generated by property assessments, BCHD's health and fitness facilities, and tenant space within the Beach Cities Health Center, as well as leases, partnerships, grants. While funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the RCFE Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory Care community as well as the PACE within the RCFE Building. In addition, BCHD would continue to be able to seek and secure

appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

Further, while the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to do so if the information *"…does not supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). CEQA Guidelines Section 15131, also specifically states *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."* As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

*Comment KY1-2*

The comment questions if $PM_{2.5}$ emissions at the Project-site and surrounding community would be monitored during construction and asserts Sunnyglen Park, Dominguez Park, and Towers Elementary School must be monitored due to safety concerns. The comment then questions responsive action and remediation that would be taken if excess levels of PM2.5 are generated during construction. The comment also questions if the public would be able to monitor emissions real-time through the internet.

It should be noted that the analysis of localized construction emissions under Impact AQ-2 describes that nearby resident as well as people using the recreational facilities located near the Project site, particularly the elderly and children, could experience adverse health effects if concentrations of criteria pollutants exceed applicable localized significance thresholds However, as shown in Table 3.2-7 in Section 3.2, *Air Quality*, implementation of MM AQ-1 would reduce on-site construction emissions for PM10 and PM2.5 below the SCAQMD LSTs, with associated avoidance of potential impacts to human health.

CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP*]." An MMRP

has been provided in Section 9.0, Mitigation Monitoring and Reporting Program and implementation responsibilities, monitoring, and reporting actions are identified in Table 9-1. Noncompliance with an adopted MMRP could result in stop work order. Other civil and administrative remedies such as fees, financial assurances such as instrument of credit or performance bonds, injunctive relief, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself.

*Comment KY1-3*

The comment states the description of shade impacts provided in the EIR is vague and qualitative and questions conclusions and questions if contour shade maps are provided for February 4th, March 21st, May 6th, June 21st, and December 21st. Summer solstice takes place between June 20 and 22 each year and is represented in Figure 3.1-5. December 21st coincides with the 2021 winter solstice and is represented in Figure3.1-7. The shade and shadow effects consider shade and shadow effects between late October and early April and between early April and late October. Thresholds of significance may be defined either as quantitative or qualitative standards, or sets of criteria, whichever is most applicable to each specific type of environmental impact. For example, quantitative criteria are often applied to air quality and noise impacts, while aesthetics impacts are typically evaluated using qualitative thresholds. The comment also inquires if a frame outlining the proposed building would be provided. The EIR analysis of impacts to aesthetics and visual resources is informed by detailed photosimulations and models prepared by VIZf/x, an expert consultant specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, for the Phase 1 preliminary site development plan. Photosimulations are often employed in the analysis of visual impacts in place of silhouettes, poles, or flag banners as they can provide an equally or more informative analysis than when utilizing silhouettes, poles, of flag banners.

*Comment KY1-4*

The comment inquires how on-site noise monitoring would be conducted and if real-time, off-site noise monitoring would be conducted as well. The comment inquires how noise complaints would be received and responded to in a timely manner. The comment also inquires about noise levels specific to machinery , noise impacts to on-site sensitive receptors (i.e., Silverado Memory Care residents), and mitigation

Construction equipment that may be used at the Project site and maximum noise levels at 50 feet is provided in Table 3.11-15. The EIR includes detailed discussion of the potential impacts and mitigation of construction-related noise and vibration both on- and off-site under *Impact*

*Description (NOI-1)* and *Impact Description (NOI-2)* in Section 3.11.5, *Project Impacts and Mitigation Measures.* This analysis includes detailed estimates of Project construction noise levels and their impact on various sensitive receptors. The full list of noise-sensitive land uses considered in the analysis of noise impacts is presented in Table 3.11-16 and includes residences near the Project site, Towers Elementary School, and health center, memory care, and childcare facilities located onsite at Building 514. As presented therein, the proposed construction activities during both Phase 1 and Phase 2 would have significant impacts to noise-sensitive receptors for the duration of the construction phases, because the projected $L_{eq}$ would exceed the *Residential* criteria. To reduce the impacts of excessive construction noise on surrounding land uses, MM NOI-1 is identified. This measure would require the implementation of a Construction Noise Management Plan that requires:

- Limitations on the hours of construction activities;
- Installation of noise barriers;
- Implementation of noise best management practices and active noise suppression features, such as muffling of equipment, use of electric power tools, and staging of equipment away from on-site and off-site sensitive uses;
- Use of designated haul routes;
- Distribution of notices prior to initiation of construction activities; and
- Frequent monitoring of noise and vibration resulting from construction to ensure implementation of all noise attenuation measures.

As discussed under Impact NOI-1 implementation of this mitigation measures, as well as required compliance with the Redondo Beach and Torrance Noise Regulations (Redondo Beach Municipal Code [RBMC] Sections 4-24.5-3 and 9-1.12 and Torrance Municipal Code [TMC] Section 6-46.31) would reduce construction noise impacts; however, feasible noise barrier heights and locations would not reduce noise levels below the FTA's residential criterion and impacts are considered significant and unavoidable. However, expected noise levels would not exceed the eight-hour 90 dBA limit identified by OSHA and the California Division of Safety and Health for defining when impacts on human health would occur. Impacts from generation of vibration on noise-sensitive receptors located along Beryl Street, Del Amo Boulevard, North Prospect Avenue, and 190th Street would be less than significant according to FTA and based on approved methodologies for analysis of noise vibration and ground-borne vibration. Nevertheless, MM NOI-2 is proposed to further reduce noise levels from heavy haul trucks during construction.

As described in Section 9.0, *Mitigation Monitoring and Reporting Program*, during construction, BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues.

*Comment KY1-5*

The comment raises concerns regarding construction-traffic at Towers Elementary during drop-off and pick-up hours and safety concerns related to vehicle pedestrian conflicts. BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes. TUSD also requested during the public comment period MM NOI-1 (Construction Noise Management Plan) to be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190$^{th}$ Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School, in order to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts. This request will require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1st grade and 5th grade), and are not the same at the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

Further, construction and operational traffic under the proposed Project is described in Section 3.12, *Transportation* and summarized in Master Response 13 – Transportation Analysis. Implementation of the Construction Traffic and Access Management Plan under MM T-2 would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction

management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible.

*Comment KY1-6*

The comment incorrectly states perchloroethane was found on the Project site. The comment may be referring to tetrachloroethylene (PCE), which was detected on site and is sometimes referred to as Perchloroethene. The comment questions what monitoring and pollutant prevention strategies would be enforced for perchloroethane (assumed to be referring to PCE) and hydrocarbon pollutants. The comment raises specific concern related to PCE emissions, truck trips, use of tarps, and transportation of hazardous materials. As described in the EIR, Total Petroleum Hydrocarbons (TPH ) in the heavy oil range was detected in two samples at boring location on-site however, they were well below the DTSC and USEPA residential screening level and do not represent a potential hazard to the environment or public health.

As summarized in Master Response 11 – Hazards and hazardous Materials, the implementation of MM HAZ-2a through -2d would ensure VOC compounds (including PCE) and contaminated soils are properly detected, removed, and handled during ground disturbing activities associated with the proposed Project. Specifically, regarding trucks, tarps, and transportation, under the Soils Management Plan required under MM HAZ-2a:

<u>Decontamination Methods and Procedures</u>

Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the on- and off-site distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas.

Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out.

<u>Truck Loading</u>

Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed, and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following:

- Materials shall be transported to an approved treatment/disposal facility.
- No excavated material shall extend above the sides or rear of the truck/trailer.
- Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.

The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material off-site

Transportation Plan

All affected soils shall be transported off-site for lawful management and disposal. Prior to load-out, the construction contractor shall prepare waste profiles for the receiving facility using analytical data from the previous environmental site assessment.

*Comment KY1-7*

The comment reiterates concerns regarding a lack of financial assessment of Project cost and anticipated revenue. The comment states financial assessment must be considered in relation to project objectives, and if the Project cannot meet objectives, it must be discarded. See Comment KY-1 above.

*Comment KY1-8*

The comment criticizes the financial analysis prepared by Cain Brothers for the proposed Project for not including depreciation and provides a reproduced calculation of profits with depreciation effects included and expresses concern that the proposed Project would not generate the income predicted under the Bain Brothers analysis. These comments are not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Concerns regarding the economic and financial success of the proposed Project are not directly associated with the *"physical impacts on the environment."* As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR. Refer to Comment Response – Financial Feasibility/Assurance for further discussion.

*Comment KY1-9*

The comment states the financial analysis prepared by Cain Brothers is flawed because it assumes full income at the third year of operation and states full income cannot reasonably by achieved until after five years of operation. The comment provides a figure demonstrating 10-year projected incomes with this recalculation. Refer to the response to Comment KY1-8.

*Comment KY1-11*

The comment criticizes the financial analysis prepared by Cain brothers for not considering loan payments and provides a figures demonstrating a 10 year projection of loan payoff during construction and a 10-year projection if loan payments are deferred until the fourth year of operation. Refer to the response to Comment KY1-8.

*Comment KY1-12*

The comment criticizes the financial analysis prepared by Cain brothers for a lack of contingency for cost overruns and schedule slippages. Refer to the response to Comment KY1-8.

*Comment KY1-13*

The comment reiterates statements that the financial analysis prepared by Cain brothers is flawed and the proposed Project would not be financially successful. See Comment KY1-8 above. The comment then speculates that Sunrise Hermosa Beach was not profitable prior to BCHD partial ownership. The comment again expresses concern over the lack of a financial plan. The comment is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

*Comment KY1-14*

The comment expresses doubt that because BCHD has not presented a plan projecting the financial success of the Project, it can be reasonably claimed that the proposed Project would meet the project pillar to *"Leverage the campus to expand community health services"* Refer to Comment KY-1.

*Comment KY1-15*

The comment questions the affordability of the proposed assisted living units and asserts the majority of Redondo Beach residents would not qualify. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to concerns regarding the cost of proposed services.

## Letter KA

June 8, 2021
Kevin Ajamian

*Comment KA-1*

The comment claims, without substantial evidence or expert proposed Project would exacerbate these traffic issues. However, the comment does not challenge any specific aspects of the analysis of transportation impacts presented in Section 3.14, *Transportation*, which is supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to construction and operational transportation impacts.

*Comment KA-2*

The comment asserts, without substantial evidence, that the proposed construction activities would make it unsafety for children walking on the surrounding streets, particularly for children walking to Dominguez Park and Towers Elementary School. The Environmental Impact Report (EIR) clearly identifies the potential impacts related to temporary, but prolonged construction-traffic impacts in Section 3.14, *Transportation* under Impact T-2. The EIR acknowledges construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the vicinity of the Project site would be potentially significant. To avoid construction-related safety hazards, implementation of Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for activities occurring with the right-of-way within the City of Torrance right-of-way along Flagler Lane and Flagler Alley. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbook*. The Construction Traffic and Access Management Plan would also specifically require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. With the implementation of MM T-2, construction-related hazards would be reduced to a less than significant level.

*Comment KA-3*

The comment expresses general concerns regarding air emissions associated with the proposed Project. However, the comment does not challenge any specific aspects of the analysis of air quality impacts to sensitive receptors in Section 3.2, *Air Quality*. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project.

*Comment KA-4*

The comment calls on Redondo Beach City Council members to oppose the Project. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment KA-5*

The comment asserts that residents do not want to trade tax dollars in exchange for safety and a clean environment. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter KY2**

June 6, 2021
Kyung Yoon

*Comment KY2-1*

The comment expresses opposition to the proposed Project, particularly the proposed Assisted Living facility. Refer to Master Response 1 – General Opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment claims, without specifics or further details, that the EIR is geared and biased to approve the proposed Project. This comment is unsubstantiated and unfounded. The comment also incorrectly asserts that it is not possible to mitigate noise, dust, and pollution to acceptable levels at residential sensitive receptors in the vicinity of the project site. As described in Section 3.11, *Noise* under Impact NOI-1, construction noise levels would result in significant and unavoidable noise impacts to sensitive receptors. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. However, as described in Master Response 10 – Air Quality Analysis, impacts related to dust and other criteria pollutant emissions would be less than significant with mitigation. The construction emissions associated with Phase 1 and Phase 2 of the proposed Project were estimated using the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod), as prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

*Comment KY2-2*

The comment asserts that the children attending Towers Elementary School throughout the duration of the proposed construction would be exposed to everything disclosed in the EIR as well as other unknowns. The comment provides to specific or further details to clarify these assertions or define these unknowns. It should be noted that the EIR has found, based on the results of various technical studies and exhaustive quantitative modeling efforts prepared by experts in their field, the proposed Project would not result in any significant and unavoidable impacts to Towers Elementary School.

*Comment KY2-3*

The comment makes speculative and unsubstantiated claims regarding the construction schedule that has been described for the proposed Project. As previously described, construction associated with Phase 1 would occur over approximately 29 months and construction associated with Phase 2 would occur over approximately 28 months. These estimates were developed with significant input from construction managers/schedulers at CBRE and were supported by a robust Construction Management Plan describing construction activities, sequencing, and heavy equipment requirements. Pursuant to California Environmental Quality Act (CEQA) Guidelines 15003, the description of construction activities clearly makes a *"a good-faith effort at full disclosure"* and is based on detailed construction scheduling information provided by a well-renowned construction management firm with decades of experience managing projects far more complex than the proposed redevelopment of the BCHD campus.

*Comment KY2-4*

The comment asserts, without substantial evidence, that the proposed Project would visually degrade the surrounding neighborhood and expresses general concerns regarding the compatibility of the proposed Project with the surrounding area. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue. The comment also recommends demolishing the existing structures on-site and replacing them with a park. As described in Section 5.0, *Alternatives, Alternative 1 – No Project Alternative* (Demolish and Replace with Limited Open Space) describes the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building. Following the completion of demolition activities, the footprint of the existing buildings would be graded and redeveloped with landscaped turf and limited hardscaping. Given the funding limitations associated with the No Project Alternative and the need for BCHD to minimize costs associated with future maintenance activities, no restrooms or other park-like facilities (e.g., slides, recreational fields, etc.) would be constructed under the No Project Alternative and this area of the Project site would be used as a passive open space. Implementation of the No Project Alternative would only achieve one of the Project Objectives (Project Objective 1).

**Letter LM**

April 9, 202
L Mooney

*Comment LM-1*

The comment expresses, without substantial evidence, general concerns regarding the size and height of the Project as well as the compatibility with the surrounding residential neighborhood. However, the comment does not challenge any specific aspects of the analysis of aesthetics and visual resources in Section 3.1, *Aesthetics and Visual Resources*, which is supported by supported by more than a dozen photographs as well as detailed computer-generated photosimulations and a shade and shadow study prepared by licensed architects. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding building height and visual character.

*Comment LM-2*

The comment asserts that the proposed Project does not align with the mission of the Beach Cities Health District (BCHD) and recommends alternative locations for the proposed Project, such as the Galleria Mall, a business park, or another busy area. Refer to Master Response 3 – Project

Need and Benefit as well as Master Response 4 – Project Objectives for detailed discussion of the relationship between BCHD's mission and the proposed Project. As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach, and Manhattan Beach as well as tens of thousands within other South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. The proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD's programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD's continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use spaces (e.g., Center for Health and Fitness, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

Regarding potential alternative locations for the proposed Project, Section 5.4, *Alternatives Considered but Rejected from Further Analysis* explores the requirements for alternate sites. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. For example, AES Redondo Beach LLC finalized the sale of the power plant site to a private developer in March 2020. The new owner of the site is currently

considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. As described in CEQA Guidelines Section 15126.6(f)(3), *"[a]n EIR need not consider an alternative…whose implementation is remote and speculative."*

*Comment LM-3*

The comment restates general concerns regarding the size and height of the Project as well as the compatibility with the surrounding residential neighborhood. Refer to the response to LM-1 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

**Letter LD1**

April 13, 2021
Lara Duke
Redondo Beach

*Comment LD1-1*

The comment questions the compatibility of the proposed Project with the existing zoning designation. As described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, the existing Beach Cities Health District (BCHD) campus is designated as P (Public or Institutional) by the Redondo Beach General Plan and zoned as P-CF (Community Facility) under the Redondo Beach Zoning Ordinance. The P designation is comprised of lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. Specific purposes of the P Public and Institutional zone regulations are to provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to Beach Cities residents. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health-treated facilities, and residential care facilities are permitted on P-CF zones with a Conditional Use Permit (CUP). A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory

Care units at Silverado Memory Care. The proposed Project – like other improvements made on the campus in the past – would require a CUP under existing code. As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project would not conflict with any P-CF zoning codes.

*Comment LD1-2*

The comment claims that BCHD has increased the size and scale of the Project since 2019. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion of previous revisions to the proposed Healthy Living Campus Master Plan in response to public comments as well as building height and visual character.

*Comment LD1-3*

The comment expresses general concern regarding traffic, property values, and neighborhood character. However, the comment provides no substantial evidence supporting these assertions. Further the comment does not challenge any specific aspects of the thresholds, methodologies, or impact analysis provided in the Environmental Impact Report (EIR). It should also be noted that the purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*). Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a full discussion of previous revisions to the Project in response to public comments as well as building height and visual character.

*Comment LD1-4*

The comment claims that the EIR describes no or only minimal adverse effects associated with the proposed Project. However, the EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.) Each of the conclusions provided in the EIR – including the disclosure of the

significant and unavoidable construction-related noise impacts – is supported by substantial evidence, technical studies, and/or exhaustive quantitative modeling efforts prepared by experts in their field.

*Comment LD1-5*

The comment expresses opposition to the Project and calls on the Redondo Beach Planning Commission and Redondo Beach City Council to do the same. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 1 – General Opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter LD3**

June 6, 2021
Lara Duke
Redondo Beach

*Comment LD3-1*

The comment incorrectly asserts that the City of Redondo Beach Measure DD would require a public vote on the proposed Health Living Campus. Measure DD, which was approved in 2008, requires a public votes for any zoning changes. The proposed Project would not require a zoning change. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation. Under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health-treated facilities, and residential care facilities are permitted on P-CF (Community Facilities) zones with a Conditional Use Permit (CUP). A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at the Beach Cities Silverado Memory Care Community. The proposed Project – like other improvements made on the BCHD campus in the past – would require a CUP under existing code. As described in RBMC Section 10-2.1116 the floor area ratios (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project would not conflict with any P-CF zoning codes.

*Comment LD3-2*

The comment claims that due to the size of the facility and the presence of other Assisted Living facilities in the City of Redondo Beach, the proposed Project is not compatible with the area surrounding the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a full discussion of previous revisions to the proposed Healthy Living Campus Master Plan in response to public comments as well as building height and visual character. Refer also to Master Response 3 – Project Need and Benefit. Regarding affordable housing concerns, it should be noted that 10 percent of the proposed Assisted Living units are being considered at below-market rates, therefore, implementation of the proposed assisted living units may help the City of Redondo Beach meet Regional Housing Needs Allocation (RHNA) for affordable housing.

*Comment LD3-3*

This comment is duplicative with Comment LD1-1; refer to the response to Comment LD1-1.

*Comment LD3-4*

This comment is duplicative of Comment LD1-2; refer to the response to Comment LD1-2.

*Comment LD3-5*

This comment is duplicative of Comment LD1-3; refer to the response to Comment LD1-3.

*Comment LD3-6*

This comment is duplicative of Comment LD1-4; refer to the response to Comment LD1-4.

*Comment LD3-7*

This comment is duplicative of Comment LD1-5; refer to the response to Comment LD1-5.

*Comment LD3-8*

The comment again questions the compatibility of the proposed Project with the existing zoning designation. Refer to response to Comment LD3-1 above and Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for detailed discussion regarding the compatibility of the proposed Project with the Redondo Beach Zoning Ordinance.

**Letter LW**

May 26, 2021
Laura Woolsey

*Comment LW-1*

The comment expresses opposition to the Project due to the size and the development adjacent to the City of Torrance. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter LDZ**

June 10, 2021
Laura D. Zahn

*Comment LDZ-1*

The comment provides a list of concerns, without substantial evidence, regarding the height, size, cost, and benefits of the Project, as well as potential impacts related to noise, construction traffic, environmental hazardous, and air quality. Each of these issues is addressed in detail within the Environmental Impact Report (EIR), with analysis supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. Refer also to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to these issues.

*Comment LDZ-2*

The comment provides a description of the types of Assisted Living facilities the commenter has previously worked at and introduces the commenter's concerns that are discussed further in the comment letter and addressed in the response to Comment LDZ-3 through LDZ-9 below.

*Comment LDZ-3*

The comment provides a description of the purposed realities of shared Assisted Living units. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment LDZ-4*

The comment expresses concerns regarding the use of elevators in the proposed Residential Care for the Elderly (RCFE) Building, particularly when crowded or in the event of an earthquake. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been noted and will be advanced to decision makers for further consideration during deliberations on the proposed Project. It should also be noted that unlike the existing buildings on the Project site, the proposed development would comply with the latest State and local building standards including Chapter 16 of the California Building Code (CBC) (as adopted by the Redondo Beach Municipal Code [RBMC] and the Torrance Municipal Code [TMC]), which contains specific requirements for seismic safety (refer to Section 3.6.2, *Regulatory Setting*).

*Comment LDZ-5*

The comment expresses concern for the mealtime conditions at the proposed RCFE Building, based on the commenter's previous experience working in Assisted Living facilities. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment LDZ-6*

The comment states that hallways in assisted living facilities get crowded with first responders, cleaning and maintenance workers, and residents moving in/out or using walkers/wheelchairs/power chairs. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment LDZ-7*

The comment expresses concern regarding the potential for fire safety impacts associated with the RCFE Building and the response times of the RBFD. As described in Section 3.13, *Public Services*, as part of the development review processes for the proposed Project, the Redondo Beach Fire Department (RBFD) and Torrance Fire Department (TFD) would review the final designs of Phase

1 and Phase 2 prior to issuance of Certificates of Occupancy to ensure that all development is designed to meet the required fire protection safety standards in the Fire Code, thus reducing overall demand for fire protection services. BCHD coordinated with RBFD regarding the requirements for emergency access as a part of the development of the preliminary site development plan for Phase 1 to ensure that the pedestrian promenade would adequately support fire engines and other RBFD assets used during a fire response or Emergency Medical Service (EMS) response.

*Comment LDZ-8*

The comment expresses concern regarding the commenter's previous experience working in assisted living facilities and the conditions of these facilities, separate from the proposed Project. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment LDZ-9*

The comment provides a list of recommendations for the RCFE Building, including but not limited to, the proposed height of the building, the ratio of residents to RCFE staff, provision of outdoor spaces, and the conditions for hiring staff. These recommendations do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter LAC

March 24, 2021
Leanne & Andy Clifton

*Comment LAC-1*

The comment expresses general concern for the size of the proposed Project, asserting, without substantial evidence, that it seems too large. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussions and response to comments pertaining to building height and visual character. As described therein, while development of the proposed RCFE Building would substantially alter existing views of and across the Project site from representative

views surrounding the site, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

*Comment LAC-2*

The comment claims, without substantial evidence or expert opinion, that the incorporation of a leisure pool in the proposed Aquatics Center in Phase 2 of the Project would not improve the health of the community. Instead, the comment asserts that an Olympic-sized pool should be considered to provide a space for club and high school teams to practice swimming. As described in Section 2.5.2.1, *Proposed Uses*, the proposed leisure pool would be provided indoors in the Aquatics Center. The outdoor portion of the Aquatics Center could include an outdoor pool that would be designed for fitness activities such as lap swimming, aquatic fitness classes. It should also be noted that programming for the Aquatics Center was informed by a market feasibility analysis prepared by Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies. This study also included a robust local survey involving 2,256 responses that focused on the types of aquatic programs in which the respondents were interested. This comment does not address the adequacy to the EIR or the impact analysis and represents the commenter's opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter LHPQ**

June 7, 2021
Leanne Hill & Peter Quelch

*Comment LHPQ-1*

The comment provides a description of the commenters' ties to the community and expresses frustrations with a gas line construction project that is unrelated to the proposed Project. Nevertheless, this comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment LHPQ-2*

The comment claims the Assisted Living units included in the proposed Residential Care for the Elderly (RCFE) Building would be affordability only to the affluent. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

*Comment LHPQ-3*

The comment makes unreferenced and unsubstantiated claims regarding potential impacts on air space, air pollution including dust, noise, and traffic. Impacts related to these resource areas are addressed in Sections 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*; Section 3.11, *Noise*, and Section 3.14, *Transportation*, respectively. The comment does not challenge any specific aspects of the thresholds, methodologies, or environmental impact analysis provided therein. Consistent with CEQA Guidelines Section 15204(b), *"if persons…believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant."* Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment LHPQ-4*

The comment claims that the proposed Project is intended to generate revenue for the Beach Cities Health District (BCHD), developers, and the City of Redondo Beach at the expense of adjacent residents. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project. The matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies – as well as numerous well-noticed public hearings. After careful consideration of projected community health needs over the coming decades, the BCHD Board of Directors identified the proposed Project as a key component to addressing future community health needs and drafted a set of project objectives, which helped define those health needs and project benefits which guided project design.

*Comment LHPQ-5*

The comment restates general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter LJZ

July 12, 2021
Linda and Joe Zelik
19405 Linda Dr., Torrance

The individual comments provided in this letter are identical to and responded to in Letter GPA.

## Letter LK

June 9, 2021
Linda Kranz
19312 Hinsdale Ave.
Torrance, CA 90503

*Comment LK-1*

The comment provides a description of the commenter's ties to the West Torrance community and expresses concern regarding the health and safety of the community, particularly the pedestrian and bicycle safety of students traveling to school. Detailed discussion of the potential impacts on traffic and pedestrian safety is presented in Section 3.14, *Transportation* under Impact T-3. As discussed therein, increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. Construction activities could also result in potential conflicts between vehicles, bicycles, and pedestrians in the vicinity of the Project site, and impacts are considered potentially significant. However, to avoid construction-related safety hazards, the Environmental Impact Report (EIR) identifies Mitigation Measure (MM) T-2, which would require the preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible. Refer

to Master Response 13 – Transportation Analysis, which describes that construction haul routes have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to schools. As described therein, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts.

*Comment LK-2*

The comment expresses concern regarding potential air quality impacts during construction activities associated with the proposed Project. As described under Impact AQ-2 in Section 3.2, *Air Quality*, peak daily criteria pollutant emission were calculated for each phase on construction. This modeling effort determined that unmitigated localized construction emissions from the proposed Project would exceed South Coast Air Quality Management District's (SCAQMD's) Localized Significance Thresholds (LSTs) for $PM_{10}$ and $PM_{2.5}$ (fugitive dust). However, implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 miles per hour, which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD's LSTs. A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment LK-3*

The comment expresses general concerns, without substantial evidence or expert opinion, regarding construction related noise. As described in Section 3.11, *Noise* the proposed Project would result in significant and unavoidable noise impacts, which are described in detail under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Mitigation Measure (MM) NOI-1 would require the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division and Torrance Building & Safety Division, to the extent that construction activities occur within the City of Torrance right-of-way. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels. Nevertheless, these temporary, but prolonged construction-related noise impacts would remain significant and unavoidable. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to commenters pertaining to noise.

*Comment LK-4*

The comment expresses general concerns, without substantial evidence, regarding the Project's potential impacts on local wildlife. As thoroughly discussed in Section 3.3, *Biological Resources*, the existing BCHD campus is fully developed with multi-story buildings and paved surfaces and vegetation on the Project site is limited to landscaped trees, shrubs, and grasses. No sensitive natural community including wetlands, streams, creeks, lakes, vernal pools, marshes, other water bodies, or riparian habitats exists on the Project site or in the surrounding vicinity. Due to the developed, urbanized nature of the Project site and the surrounding vicinity, there are no recognized wildlife corridors or habitat linkages. Due to the developed, urbanized character of the Project site and the surrounding vicinity, the analysis of biological resources is focused on potential impacts to the landscaped trees and shrubs at the Project site that could potentially serve as nesting and roosting sites for resident or migratory birds.

While the Project would result in the removal of landscaped trees and shrubs within the interior portions and along the perimeters of the existing campus, the proposed Project's landscaping plan would replace trees and shrubs with new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal Code (RBMC) Section 10-2.1900, and proposed tree removal and landscaping along Flagler Lane would be conducted consistent with the Torrance Street Tree Master Plan. The proposed landscaping – including large landscaped trees and shade trees that are adapted to the climate of Southern California – would provide enhanced roosting or nesting habitat for resident and migratory birds. In addition, the implementation of MM BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged (i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation.

*Comment LK-5*

The comment expresses concern for the level of noise associated with Project construction and claims the commenter would be subject to daily construction noise for years. Refer to the response to Comment LK-3 as well as Master Response 12 – Noise Analysis. As described in Section 3.11,

*Noise*, each stage of construction would involve a different mix of operating equipment, and noise levels would vary based on the amount and types of equipment in operation and the location of the activity.

*Comment LK-6*

The comment claims, without substantial evidence, that the proposed Project is out-of-scope and too large for the existing neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion related to these issues As described therein, development of the proposed RCFE Building would substantially alter existing views of and across the Project site from representative views surrounding the site. However, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

The comment goes on to assert that the proposed Project is too costly, with little value-added to the quality of life in the surrounding community. Refer to Master Response 6 – Financial Feasibility/Assurance as well as Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to these issues.

*Comment LK-7*

The comment expresses opposition to the proposed Project, particularly access to the Project from Flagler Lane, Flagler Alley, and all land within the City of Torrance. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should also be noted that Section 5.0, *Alternatives*, considers four alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane.

## Letter LY

June 15, 2021
Lisa Youngworth

*Comment LY-1*

The comment expresses general opposition to the proposed Project, asserting, without substantial evidence, that the proposed Project would result in traffic, safety, health and environmental

hazards. The comment also goes on to assert, again without substantial evidence, the proposed Project is too tall and too dense for the surrounding single-family residential neighborhood. Traffic and safety issues are discussed at length in Section 3.14, *Transportation*, and are supported by various transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Similarly, Section 3.2, *Air Quality* and Section 3.8, *Hazards and Hazardous Materials* provide a detailed analysis of potential environmental hazards, supported by exhaustive air quality modeling as well as Phase I and Phase II Environmental Site Assessment (ESAs). The comment provides no specifics or further details to clarifying its assertions.

The comment asserts that there is a lack of transparency with the public, but does not provide any supporting information to substantiate this assertion that BCHD has not been fully transparent with the public. Contrary to the assertion in this comment, BCHD has been dedicated to engaging in public outreach, including forming a 20-person Community Working Group (CWG) to represent the various populations and organizations in the Beach Cities and engage local participants in the planning of proposed redevelopment. The proposed Project was developed as a result of more than 60 meetings hosted over a 3-year period and attended by more than 550 community members. The proposed Project has also been discussed at numerous well-noticed public meetings, including five scoping meetings, an unusually high number. The claim that BCHD lacks transparency with the public is unfounded.

The comment claims, again without substantial evidence, that the proposed Project is too tall and too dense for a residential neighborhood. First, it is important to note that each of the environmental issues raised in this comment were addressed in the EIR. Visual impacts – including potential impacts relating to building height, which also considered the topography of the Project site and the surrounding area – were addressed in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 and Impact VIS-2. This analysis is supported by more than a dozen photographs, detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Finally, the comment claims that the Project is a poor use of taxpayer funds. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to this issue.

*Comment LY-2*

The comment provides a link to and agrees with the information provided in the following webpage: https://www.traonews.org/why-oppose. These reasons are provided by Torrance Redondo Against Overdevelopment (TRAO), and are also referenced and responded to in Letter GPA.

**Letter LH2**

June 3, 2021
Lyndon Hardy

*Comment LH2-1*

This comment incorrectly states that there are no visualizations of Phase 2 structures and asserts that there is no data upon which to judge the visual impact of the proposed Aquatic Center and parking structures. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program. Generally, a program Environmental Impact Report (EIR) analyzes a project for which less specific detail is currently known, but would be developed at a later date.

The visual impact analysis relies on the best available information for the development program in Phase 2. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the development program under Phase 2 of the proposed Healthy Living Campus Master Plan is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions based on maximum disturbance footprints and maximum building heights.

The EIR makes no excuses about the programmatic nature of the Phase 2 development program. Rather, the EIR discloses this information and provides a defined scope for the programmatic analysis. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in

the program EIR, later analysis of the environmental effects of the activities may be required (California Environmental Quality Act [CEQA] Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment LH2-2*

The comment claims that the increase in traffic resulting from the implementation of Phase 2 is inadequate asserting that the contractors were unqualified and used data that did not apply. The EIR includes a robust transportation study provided as Appendix K, which was prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Fehr & Peers also assisted the City of Redondo Beach with the recently adopted Vehicle Miles Traveled (VMT) threshold. Fehr & Peers is clearly qualified and well suited to prepare the analysis for the proposed Healthy Living Campus.

As thoroughly described in Section 3.14.3, *Impact Assessment and Methodology*, Fehr & Peers began with the standard Institute of Transportation Engineers (ITE) trip generation rates, which represents the industry standard for estimating trip generation and is based on a compilation of empirical (i.e., observed) trip generation surveys at locations throughout the country. While ITE Trip Generation is a defensible approach, ITE always recommends utilizing local data where it is available. Therefore, Fehr & Peers calibrated these rates by incorporating driveway counts, pedestrian surveys, Center for Health and Fitness (CHF) membership scans, BCHD programming information, and market feasibility studies.

The comment does neither challenges any specific aspect of this methodology nor suggests a different methodology that would better meet the suggest level of sufficient rigor.

*Comment LH2-3*

The comment incorrectly suggests that the air quality analysis did not account for fine particulate matter ($PM_{2.5}$). In particular the comment suggests that the cumulative effects of $PM_{2.5}$ emissions have been overlooked.

Fine particulate matter is discussed at length is Section 3.2, *Air Quality* and potential health effects associated with fluctuations in $PM_{2.5}$ are disclosed. As described under Impact AQ-2, peak daily criteria pollutant emissions from construction of the proposed Project would not exceed the South Coast Air Quality Management District's (SCAQMD's) mass daily significance thresholds for construction. Unmitigated localized construction emissions from the proposed Project would exceed the SCAQMD's Localized Significance Thresholds (LSTs) for $PM_{10}$ and $PM_{2.5}$ (fugitive dust). However, implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 miles per hour (mph), which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for $PM_{10}$ and $PM_{2.5}$ below the SCAQMD's LSTs.

It should also be noted that a Health Risk Assessment (HRA) was prepared for the proposed Project, which demonstrated that the use of Tier 4 Final engines would reduce Diesel Particulate Matter (DPM) emissions from combustion by 94 percent during Phase 1 construction and 79 percent during Phase 2 construction (refer to Table 3.2-11). Therefore, mitigated DPM emissions anticipated during construction activities would not exceed SCAQMD thresholds for cancer risk, and impacts would be less than significant with mitigation.

The comment does not challenge any specific aspect of these quantitative modeling exercises and does not provide any substantiating evidence linking the modeled emissions to a physical environmental impact.

With respect to cumulative impacts, as discussed under Impact AQ-1, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would not conflict with the 2016 Air Quality Management Plan (AQMP), which serves as the Basin's approved AQMP; therefore, the project's contribution to air quality impacts would not be cumulatively considerable under CEQA. As described in Section 3.2.3.2, *Methodology*, SCAQMD's cumulative significance thresholds are the same are the same as project-specific significance thresholds. As such, the SCAQMD considers projects that do not exceed the project-specific thresholds to not contribute considerably to a cumulatively significant impact.

*Comment LH2-4*

The comment claims that a programmatic procurement approach would be used during the proposed development under Phase 2 and asserts that so long as these details do not violate any data limits they can be anything leaving the public with no opportunity to object. The comment

claims that this is an end-around that defeats the purpose of CEQA for the development under Phase 2.

As described in the response to Comment LH2-1, a programmatic analysis simply assesses a project for which less specific detail is currently known, but would be developed at a later date. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Additionally, it should also be noted that all development under Phase 1 and Phase 2 of the proposed Healthy Living Campus Master Plan would be subject to Redondo Beach Planning Commission Design Review(s) in compliance with the Community Facility (P-CF) zoning designation for the Project site as established in RBMC Section 10-2.1116 and TMC Section 13.9.7.

*Comment LH2-5*

The comment incorrectly asserts that under the Design-Bid-Build procurement process the contractor can negotiate changes in the design and sidestep the CEQA process. However, in compliance with CEQA Guidelines Section 15162, any substantial changes to a proposed project would need to be reassessed to determine whether it would result in a new significant environmental effect(s) or a substantial increase in the severity of a previously identified significant effect(s). If so, and depending to what extent, a Subsequent EIR (CEQA Guidelines Section 15162), a Supplemental EIR (CEQA Guidelines Section 15163), or an Addendum (CEQA Guidelines Section 15164) to the previously prepared EIR may be required.

*Comment LH2-6*

The comment incorrectly asserts that the Healthy Living Campus Master Plan has been constructed to that the entire CEQA process becomes measures a check-the-box exercise. As is common with various large scale capital improvement and infrastructure projects, the Healthy Living Campus Master Plan has been broken into phases for planning and implementation purposes. The process for assessing the environmental impacts in this scenario is clearly described in the CEQA Guidelines Section 15165:

> *"Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect."*

As described in As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

**Letter MB1**

May 26, 2021
M. Bursschinger

*Comment MB1-1*

The comment requests that the Beach Cities Health District (BCHD) not move forward with the proposed Project. The comment claims, without substantial evidence, that it would not be beneficial to the community, would be too expensive and detrimental to build, and the proposed Assisted Living units would not be affordable. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the need for the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for detailed discussion and response to comments pertaining to the financial characteristics and economic impacts of the proposed Project. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the affordability of the proposed senior residential care.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter MCG**

June 8, 2021
Marcia & Carl Gehrt
19935 Redbeam Avenue
Torrance, Ca 90503

*Comment MCG-1*

The comment states that implementation of the proposed Project is not consistent with the mission statement of the Beach Cities Health District (BCHD) and suggests the proposed Project is profit-motivated as evidenced including gym and workout classrooms under Phase 2, if funds are available. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need for the proposed Project. It should also be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

*Comment MCG-2*

The comment briefly summarizes the significant and unavoidable noise impact identified in Section 3.11, *Noise* under Impact NOI-1. The comment suggests that eliminating the removal of structures from the proposed Project would mitigate noise impacts to nearby residences. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives, which describe the underlying purpose for the removal of the existing Beach Cities Health Center, including escalating maintenance costs as well as potential seismic safety issues.

*Comment MCG-3*

The comment suggest removing demolition activities from the proposed Project would eliminate risk related to release of hazardous materials in proximity of sensitive receptors including Towers Elementary students. As described in Master Response 11 – Hazards and Hazardous Materials Analysis, with the implementation of the required mitigation measures, potential impacts associated with hazardous building materials during demolition would be less than significant and would not jeopardize the health of the surrounding community or nearby sensitive receptors.

*Comment MCG-4*

The comment describes that condominium and apartments in the Greater Los Angeles Area are implementing earthquake preventive measures and suggests such strategies be implemented at the Project site. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments regarding escalating maintenance costs and seismic safety. As described in the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible.

Nevertheless, it should be noted that the under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease

building space to fund community health and wellness programs and services, similar to existing conditions.

*Comment MCG-5*

The comment claims that the new gym included in the proposed Project could be enlarged and other programs that support aging in place could be expanded. It should be noted that Phase 2 of development would support space for a new CHF. Additionally, with regard to aging in place, it should be noted the campus currently provides in-home services for adults, volunteer support, care planning and consultation, and limited transportation assistance. Additionally, the proposed Program of All-Inclusive Care for the Elderly (PACE) program would support these existing services. As provided in Section 2.5.1 *Preliminary Site Development Pla*n, "*PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation."* As such, implementation of the proposed PACE program would support residents who wish to age in place. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need and anticipated benefit of the proposed Project.

The comment asserts the proposed Project is motivated by profit and must be stopped. However, as described in the response to Comment MCG-1, it should also be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities.

*Comment MCG-6*

The comment expresses general opposition to overdevelopment. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter MG1

March 24, 2021
Redondo Beach Resident

*Comment MG1-1*

The comment expresses opposition to the proposed Project and claims that neither the Beach Cities Health District (BCHD) Board of Directors nor BCHD management have not addressed the concerns of residents. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment MG1-2*

The comment states the Project site is owned by residents, presumably residents of the Beach Cities and intended for public use by the community. The comment further states the Project site is not intended to benefit the few of BCHD management. However, contrary to this comment, the campus is owned by BCHD, a public agency and is designated P (Public or Institutional) land use within the Redondo Beach General Plan. The P designation includes lands that are owned by public agencies, special use districts, and public utilities. Permitted uses under the P land use designation include governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (i.e., schools), cultural (e.g., libraries, museums, performing and visual arts, etc.), human health, human services, public utility easements, and other public uses. The proposed Project would expand existing human health, human services, and recreational facilities which are consistent with the P land use designation and would continue to serve the public. Please refer to Section 3.10*, Land Use and Planning* for detailed discussion of Project impacts on land use and consistency with applicable land use planning goals, policies, and regulations that govern the use and development of the Project site. Refer also to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need and anticipated benefit of the proposed Project.

*Comment MG1-3*

The comment asserts, without substantial evidence or expert opinion, that the proposed Project is not compatible with the surrounding neighborhood, noting the height of proposed development and the nearby residences. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis

for a detailed discussion and response to comments pertaining to building height and visual character. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings

*Comment MG1-4*

The comment expresses opposition to BCHD's role as the lead agency. The comment also questions choices between funding for Phase 1 and Phase 2. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to BCHD's role as lead agency. Refer also to Master Response 6 – Financial Feasibility/Assurance for detailed discussion and response to concerns regarding the financial characteristics and economic impacts of the proposed Project.

*Comment MG1-5*

The comment states the number of units included under the proposed Assisted Living program and Memory Care community were not included when the city's Regional Housing Needs Allocation (RHNA) was calculated. As described Section 3.12.1, *Environmental Setting*, the RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The Southern California Association of Governments (SCAG) determines the housing growth needs for municipalities within its jurisdiction, which includes the City of Redondo Beach and the City of Torrance. As required by State Housing Law, both cities are in the process of updating their General Plan Housing Elements to accommodate the allocated units and plan for future population growth. As a special district dedicated to public healthcare, BCHD is not subject to the RHNA and is not required by State Housing Element Law to plan for residential units on its campus. However, 10 percent of the proposed units are being considered at below-market rates, therefore, implementation of the proposed assisted living units may help the City of Redondo Beach meet RHNA for affordable housing.

*Comment MG1-6*

The comment requests the Draft EIR be opposed. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter MG2

June 10, 2021
Marcie Guillermo, Pharm.D.
Redondo Beach Resident

*Comment MG2-1*

The comment states, without substantial evidence, that the Environmental Impact Report (EIR) fails to provide a decent analysis of the six alternatives and requests analysis be prepared keeping in mind community concerns. However, the comment fails to provide specifics or clarifying details describing how alternatives analysis is insufficient.

*Comment MG2-2*

The comment questions why Alternative 1 – No Project Alternative (Demolish and Replace with Open Space) does not consider leaving the Project site in its current condition. As described under Section 5.5.5, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)*, under the No Project Alternative, the Beach Cities Health District (BCHD) would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is *"reasonably expected to occur in the foreseeable future"* clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

*Comment MG2-3*

The comment suggests regarding Alternative 6 – Reduced Height Alternative that heights of proposed structures be kept consistent with the surrounding neighborhood. The comment questions why the height of structures in the City of Redondo Beach would be different from an adult living

structure in City of Manhattan Beach. The comment further asserts that the proposed Project does not belong in a neighborhood characterized by residential homes and schools. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments on building height and visual character.

It should also be noted that the proposed development has been sized to provide adequate square footage to support the proposed uses and to meet the project objectives related to revenue generation. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. Nevertheless, as described in Redondo Beach Municipal Code (RBMC) Section 10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district are subject to Planning Commission Design Review. The comment cities RBMC Section 10-2.2502, which guides the Planning Commission Design Review. As described in Section 3.1, *Aesthetics and Visual Resources* and Section 3.10, *Land Use and Planning*, the Planning Commission Design Review could further revise the proposed Project (e.g., limit FAR, building height, setbacks, etc.); however, the EIR appropriately defines and analyzes the maximum disturbance envelope pursuant to the requirements of California Environmental Quality Act (CEQA).

*Comment MG2-4*

The comment states a healthy campus is needed for the *entire* community. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter MB2**

June 9, 2021
Maren Blyth

*Comment MB2-1*

The comment expresses general opposition to the proposed Project. The comment incorrectly states that the proposed Project would convert the Project site from a public to private enterprise. The existing campus is owned by the Beach Cities Health District (BCHD); this ownership would not be changed under implementation of the proposed Project. The existing campus is also

designated P (Public or Institutional) land use within the Redondo Beach General Plan. Permitted uses under the P land use designation include governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (i.e., schools), cultural (e.g., libraries, museums, performing and visual arts, etc.), human health, human services, public utility easements, and other public uses. The proposed Project would expand existing human health, human services, and recreational facilities which are consistent with the P land use designation and would continue to serve the public. Finally, it should also be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

*Comment MB2-2*

The comment expresses concern related to the funding of demolition and redevelopment of the health center building proposed under Phase 2 of the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to these issues. Contrary to the commenter's assertion, the Center for Health and Fitness (CHF) as well as the existing health and wellness programs and services would still be available during Phase 1 and Phase 2 of the proposed Project. In fact, the implementation of the proposed Project would address the existing maintenance costs that are beginning to outpace revenues, and would ensure that these health and wellness programs and services could continue on into the future.

*Comment MB2-3*

The comment states that the proposed Project should be dropped. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter MS

June 6, 2021
Maria Schneider

*Comment MS-1*

The comment expresses opposition to the proposed Project and concern for adverse health impacts on nearby residences and school students. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should also be noted that impacts to sensitive receptors are clearly described throughout the EIR, including a quantitative analysis of construction-related air quality, hazards and hazardous materials, and noise. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and hazardous Materials, and Master Response 12 – Noise Analysis.

*Comment MS-2*

The comment expresses general concerns, without substantial evidence or expert opinion, regarding health impacts related to air quality, water quality, pollutants, soil erosion, and traffic congestion. Each of these issues is addressed in detail within the EIR. For example, the air quality analysis presented in Section 3.2, *Air Quality* presents the results of the California Emissions Estimator Model (CalEEMod) and construction Health Risk Assessment (HRA) prepared for the proposed Project by the air quality experts at iLanco. The CalEEMod results and the conclusion of the construction HRA are the results of carefully made assumptions reading schedule, duration, construction equipment, and application of air emissions control measures as well as robust air quality modeling. The air quality analysis compares the results of these studies to the quantitative significance thresholds established by the South Coast Air Quality Management District (SCAQMD) and meets all of the requirements in the California Environmental Quality Act (CEQA) Guidelines. Beyond simple assertions that construction activities would result in health impacts on , the comments provided on this issue do not challenge the methodology, assumptions, or quantitative results of this extensive quantitative modeling effort.

*Comment MS-3*

The comment asserts, without substantial evidence or expert opinion, that there would be inconveniences of traffic and noise as well as impacts on air, water, and soil quality. These issues are thoroughly addressed in Section 3.2, *Air Quality*, Section 3.6, *Geology and Soils*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.9, *Hydrology and Water Quality*, Section 3.11,

*Noise*, and 3.14, *Transportation*. Potential impacts on sensitive receptors are also described therein, where appropriate.

**Letter MN1**

March 10, 2021
Mark Nelson

*Comment MN1-1*

The comment notes that Table ES-2 of the Draft Environmental Impact Report (EIR) does not include the impact comparison of Alternative 6. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

**Letter MN2**

March 22, 2021
Mark Nelson

*Comment MN2-1*

The comment objects to a previous response provided by the Beach Cities Health District's (BCHD's) public records request system. The comment further states that due to BCHD's indication that the proposed Project would not involve land acquisition, either this statement is true, no acquisition would occur under the proposed Project, or the EIR made a misrepresentation. As described in Section 2.2.1, *Project Location*, the Project sites contain two legal parcels: Assessor's Identification Number [AIN] 7502-017-903 and AIN 7502-017-902. The proposed Project would not expand beyond these properties or outside existing boundaries.

**Letter MN3**

March 22, 2021
Mark Nelson

*Comment MN3-1*

The comment states the revised 2020 Master Plan is taller and occupies a greater square footage than project designs proposed under the 2019 Master Plan. The comment notes previous petition regarding the size of the development proposed under the 2019 Master Plan. The comment incorrectly states the current version of the proposed Healthy Living Campus Master Plan removed 160,000 square feet of underground parking and relocated it to an 800-car parking structure. Refer

to Master Resources 9 – Aesthetics and Visual Resources for a summary of previous revisions to the proposed Healthy Living Campus Master Plan. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment MN3-2*

The comment expresses doubt regarding the number of comments received by BCHD, noting submitted petitions, comments on the Notice of Preparation (NOP), and comments provided on June 17, 2020 and suggests public comments have been discarded. All comments received during the review periods for the NOP and the Draft EIR are published on the BCHD website here: https://www.bchdcampus.org/eir. Since their publication, BCHD has not received communication that a comment has been omitted or discarded.

*Comment MN3-3*

The comment states BCHD increased the height and square footage of proposed development. Refer to Master Resources 9 – Aesthetics and Visual Resources for a summary of previous revisions to the proposed Healthy Living Campus Master Plan. The comment goes on to assert, without substantial evidence or expert opinion, that the community has suffered environmental and economic injustice impacts as well as siren, traffic, noise, air quality, nighttime lighting, and reduced property value impacts related to the former South Bay Hospital. Physical environmental impacts of the proposed Project are addressed in detail in the EIR and are supported by technical studies and exhaustive modeling efforts. The comment does not challenge as specific aspects of the thresholds, methodologies, or findings of this analysis. Property value loss and environmental justice impacts in and of themselves are not physical impacts on the environment that are required to be included in a CEQA analysis. Specifically, CEQA states that *"an economic or social change by itself shall not be considered a significant effect on the environment"* (CEQA Guidelines Section 15131 and 15382).

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**Letter MN4**

March 24, 2021
Mark Nelson

Comment MN4-1

The comment states that BCHD falsely claims that the most recent iteration of the proposed Project would decrease building square footage, compared to earlier project designs. The comment

provides an unsubstantiated claim that the proposed Project would move 160,000 square feet of subterranean parking to the surface buildings, thereby increasing overall surface buildings. The comment concludes BCHD must retract false information. As described in Section 2.5.2, Phase 2 Development Program, due to the programmatic nature of Phase 2, the ultimate location and size of the proposed parking structure has not yet been finalized. However, the proposed parking structure would not exceed 292,500 square feet of parking or 736 parking structures

The comment does not address information provided in the EIR, but points to the BCHD website as the subject of dissent. As provided in Table 1-2 of the EIR, the 2019 Master Plan included a total occupied building area of 592,700 square feet. However, as described in Section 1.0, Introduction, community response to the 2019 Master Plan expressed concern regarding the 2019 project's proposed density. In response, the 2020 and current proposed Project reduced total occupied building area to 484,900 square feet. This reduction in total building area was achieved through site redesign and reducing the size of the proposed RCFE Building by more than 219,000 square feet. Overall, the proposed Project would reduce total occupied building area would be than that proposed under the 2019 Master Plan.

**Letter MN5**

March 24, 2021
Mark Nelson

*Comment MN5-1*

The comment asserts that the Beach Cities Health District (BCHD) elected to be the lead agency so that it could self-certify the Final Environmental Impact Report. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response comments pertaining to this issue.

**Letter MN6**

March 24, 2021
Mark Nelson

*Comment MN6-1*

The comment provides a link to an article titled *John Wood Group reserves $46M to resolve bribery investigations.* The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

## Letter MN7

March 24, 2021
Mark Nelson

*Comment MN7-1*

The comment provides a link to an article prepared by Corporate Watch titled *Wreckers of the Earth: London Company Directory*. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

## Letter MN8

March 25, 2021
Mark Nelson

*Comment MN8-1*

The comment states that tetrachloroethylene (PCE) contamination must be remediated by excavation, citing it as the most effective decontamination method. As described in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-2, PCE-contaminated soils would be encountered during ground-disturbing activities, which include excavation of the subterranean levels of the Residential Care for the Elderly (RCFE) Building, proposed parking structure, and service levels. However, implementation of MM HAZ-2a through -2d would ensure contaminated soils are properly detected, removed, and handled during ground disturbing. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue.

## Letter MN9

March 25, 2021
Mark Nelson

*Comment MN9-1*

The comment claims BCHD failed to fulfil a public records request in a timely fashion, impeding public evaluation. The public records request in question requests information on the cost-effectiveness of seismic retrofit and demolition and reconstruction. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project.

It should be noted that CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

It should also be noted that Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space* explores a seismic retrofit – funded by a local bond measure.

**Letter MN10**

March 25, 2021
Mark Nelson

*Comment MN10-1*

The comment claims BCHD failed to fulfil a public records request. The public records request in question requests documentation of reduced open space between the 2019 Master Plan and the proposed Project. As demonstrated in Table 1-2, active opens space in the 2019 Master Plan was reduced from 3.6 acres to 2.45 acres under the proposed Project. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

**Letter MN11**

March 25, 2021
Mark Nelson

*Comment MN11-1*

The comment expresses general concerns regarding the Beach Cities Healthy Living Campus Master Plan. The comment asserts that the document fails to provide an accurate, stable, and finite Project Description, causing the public to spend excess time and money evaluating the draft. The comment claims that without a final product, the public is unable to engage in intelligent participation.

Regardless of the commenter's opinion of the Beach Cities Healthy Living Campus Master Plan, Section 2.0, *Project Description* meets the requirements of CEQA Guidelines Section 15124.

Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic description and programmatic analysis of the Phase 2 development program.

**Letter MN12**

March 26, 2021
Mark Nelson

*Comment MN12-1*

The comment requests information and documentation regarding seismic risk and other seismic-related effects of the Beach Cities Health Center. This public records request is not pertinent to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project.

As described in Section 2.1, *Introduction* and Section 2.4.2, *Project Background*, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the *Beach Cities Health District Seismic Assessment* and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible.

It should be noted that BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

**Letter MN13**

March 29, 2021
Mark Nelson

*Comment MN13-1*

The comment inquires if comments will be accepted for the Master Plan during the public comment period for the Draft Environmental Impact Report (EIR). The public review period, described in Section 1.4, *Public Review and Comments*, provides opportunity for interested parties to comment on the technical sufficiency of the Draft EIR. California Environmental Quality Act (CEQA) Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

**Letter MN14**

April 2, 2021
Mark Nelson

*Comment MN14-1*

The comment requests information on analyses regarding the downsizing of BCHD, expenses associated with 514 North Prospect Avenue (Beach Cities Health Center and attached Maintenance Building) and reason why such costs cannot be deferred. The comment claims BCHD has not responded to previous public records act requests and suggests the need for the proposed Project, including seismic retrofit or demolition is not valid. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project.

It should be noted that CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

## Letter MN15

April 4, 2021
Mark Nelson

*Comment MN15-1*

The comment provides the following excerpt from Section 3.1, *Aesthetics and Visual Resources* of the Environmental Impact Report (EIR): *"Impact VIS-1The proposed Residential Care for the Elderly Building included in Phase 1 preliminary development plan would interrupt public views of the Palos Verdes hills from the highpoint at 190th Street and Flagler Lane. However, a reduction in the height of the building would reduce this impact to less than significant with mitigation."* The comment claims that this is an inaccurate statement, because the elevation at 190th Street & Prospect Avenue is 6 feet higher than the elevation at 190th Street & Flagler Lane. With regard to maximum elevation views along 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along 190th Street that provide slightly elevated views – including the intersection of 190th Street & Prospect Avenue, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource.

The comment provides supporting visual images of a homemade Google Earth Pro model of the proposed Project from two vantage points and notes where the model allegedly interrupts skyline views of the Palos Verdes ridgeline. First the homemade Google Earth Pro model does not follow the same rigorous methodology for developing photorealistic and technically accurate images as the computer-generated photosimulation that was prepared for Representative View 6 by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts. As described in Section 3.1.1, *Methodology, "[e]ach representative view was photographed to establish the existing visual condition from the selected public location. Photosimulations of the Phase 1 preliminary site development plan 3D model were prepared from each representative view to provide a 'before and after' representation for analysis. The representative analysis focuses on changes from existing conditions as they would be experienced by motorists, bicyclists, and pedestrians from the public realm. The base photography and photosimulations at each representative viewing location were independently prepared by VIZf/x. VIZf/x used a Nikon d7100 camera with a 35-millimeter lens giving the closest approximation to the human eye. The source image is comprised of between 8 and 10 vertical renderings captured from a tripod and stitched together to create the source base image. Each*

*rendering is 25 percent of what the actual 35-millimeter lens captures, which minimizes any curvature to the architecture and reduces distortion.*

More importantly, the homemade Google Earth Pro model does not accurately depict topography, vegetation, and intervening structures. A simple Google Street view at the intersection of 190th Street & Prospect clearly show that the Beach Cities Health Center already interrupts the Palos Verdes ridgeline and is further obscured by power lines and street trees that line Prospect Avenue. While the development under the proposed Project would be visible and would still interrupt the Palos Verdes ridgeline, when viewed from this location this would not represent a new interruption like it would 190th Street & Flagler Lane.

It should further, it should be noted that CEQA Guidelines Section 15151 states that "*[a]n evaluation of environmental effects of a proposed project need not be exhaustive…"* This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide *"a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations"* (CEQA Guidelines Section 15151).

Refer to BCHD Master Response 9 – Aesthetics and Visual Resources Analysis for further discussion pertaining to impacts to scenic resources.

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**Letter MN16**

April 4, 2021
Mark Nelson

*Comment MN16-1*

The comment identifies financing rates and bond rates and suggests use of A-rated bonds, and non-profit management could create a more affordable Assisted Living Program. See Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments pertaining to this issue. However, again, it should be noted that the California Environmental Quality Act (CEQA) states that an Environmental Impact Report (EIR) should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental*

*impact"* (CEQA Guidelines Section 15124). Further, CEQA Guidelines Section 15204 states that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

**Letter MN17**

April 4, 2021
Mark Nelson

*Comment MN17-1*

The comment states 80 percent of residents of the proposed assisted living units will come from outside of the Beach Cities. The comment states that Redondo Beach will accrue economic and environmental justice impacts while receiving few benefits. As described in Market Response 5-Affordability of RCFE Assisted Living and Memory Care Units, the market study prepared for the proposed Project identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. The comment incorrectly claims Redondo Beach has born environmental justice impacts for 60 years related to the operation of the Project site. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

**Letter MN18**

April 5, 2021
Mark Nelson

*Comment MN18-1*

The comment asserts that the Beach Cities Health District (BCHD) is attempting to block intelligent public participation due to lack of response to California Public Records Act. California Environmental Quality Act (CEQA) Guidelines Section 15204 states that *"[i]n reviewing draft*

*EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

As described in response to this comment via email, BCHD has determined that the commenter's numerous requests for public documents imposes an excessive burden on BCHD's limited staff and resources, thereby disrupting its ability to provide due attention to its primary government functions as well as further delaying BCHD's responses. BCHD's public purpose is not well served by diverting its personnel from their normal duties of serving the public to the time-consuming task of searching for and reviewing potentially thousands of ill-defined documents on a disparate array of topics. BCHD is a small public agency with a relatively small staff and is operating under emergency protocols due to the COVID-19 crisis. Pursuant to Government Code Sections 6254(a), (c), and (k) (and possibly other subsections), Government Code Section 6255 and the case law in California that establishes that a public agency *"is only obliged to disclose public records that can be located with reasonable effort and cannot be subjected to a 'limitless' disclosure obligation."* Bertoli v. City of Sebastopol (2015) 233 Cal.App.4th 353, 372, quoting American Civil Liberties Union Foundation v. Deukmejian (1982) 32 Cal.3d 440, 447. Nevertheless, BCHD has, in its discretion and not as a legal obligation, endeavored to produce responsive non-exempt documents as they can be reasonably identified from these requests within the reasonable capabilities of BCHD staff. BCHD has been willing to work cooperatively to narrow the scope of the overly broad California Public Records Act requests so that the search can be focused on documents that are identifiable and can be produced with reasonable effort. The timing of BCHD to produce any more documents notwithstanding the undue burden imposed on BCHD inevitably took an extended period of time.

The comment also incorrectly states only three days of public review were allowed prior to approval. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

*Comment MN18-2*

The comment claims that BCHD has demonstrated lack of planning and risk management and that, like the South Bay Hospital District, BCHD is a poor fiduciary to the taxpayer-owners. This comment does not address the adequacy of the EIR with regard to the environmental impact

analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

**Letter MN19**

April 5, 2021
Mark Nelson

*Comment MN19-1*

The comment asserts, without substantial evidence or expert opinion, that the Environmental Impact Report (EIR) has not considered the effects of chronic stress impacts. The comment claims that the definition and quantification of negative impacts, including those relating to economic and environmental justice, must be reviewed, utilizing government sources. It should be noted that CEQA Guidelines 15131 specifically states *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

The comment goes on to make unsupported claims that the proposed Project like the operation of the existing campus, would have negative environmental justice impacts to the surrounding neighborhoods: related to:

- excess traffic-induced safety hazards,
- excess traffic-induced ground level tailpipe pollution,
- excess delivery vehicle diesel fuel emissions,
- excess emergency vehicle noise, excess window glare,
- excess shading caused by tall buildings on a 30 foot hill,
- excess heat islanding impacts,
- excess night lighting from parking lot lighting,
- excess night lighting from signage,
- excess noise from night time maintenance vehicles and operations,
- excess crime (construction periods are well understood to increase crime rates),
- excess crime (BCHD periodically has un-housed living on the Flagler side),

- excess crime (BCHD Flagler alley is frequented by the un-housed and transients),
- excess fugitive dust and emissions from construction,
- excess noise from construction,
- excess asbestos risk from construction,
- excess water runoff,
- reduced visual privacy,
- increased cardiovascular risk from noise,
- increased chronic stress (Bluezone's "silent killer"), and
- impaired cognitive function.

The EIR addresses the physical environmental impacts of the proposed Project as required by the CEQA Guidelines. Additionally, EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.) Each of the conclusions provided in the EIR – including the disclosure of the significant and unavoidable construction-related noise impacts – is supported by substantial evidence, technical studies, and/or exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge the thresholds, methodologies, or findings of this analysis. Additionally, the claim that the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

The comment then provides various citations to articles and studies relating to stress, noise, and nighttime lighting but none of the referenced citations conflict with or challenge any specific aspects of the EIR analysis. For example, none of the articles: *Maximize Health and Longevity Using These Stress Management Strategies*, *How Stress Makes Us Sick and Affects Immunity*, Inflammation, Digestion, nor *The Effects of Chronic Stress on Health: New Insights Into the Molecular Mechanisms of Brain-body Communication*, address or provide a clear relationship to construction or operation of the proposed Project.

**Letter MN20**

April 6, 2021
Mark Nelson

*Comment MN20-1*

The comment describes that the comments contained in the letter serve as a rebuttal to statements by the Beach Cities Health District (BCHD). These comments are addressed in the responses to Comment MN20-2 through MN20-6 below.

*Comment MN20-2*

The comment claims the proposed Project is larger and taller than previous design iterations. Refer to the response to Comment MN4-1 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

*CommentMN20-3*

The comment asserts that the Environmental Impact Report (EIR) lacks a stable, accurate, and finite project description and claims that the BCHD campus and the proposed Project would result in environmental impacts. As described in the response to Comment MN11-1, Section 2.0, *Project Description* meets the requirements of California Environmental Quality Act (CEQA) Guidelines Section 15124. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic description and programmatic analysis of the Phase 2 development program.

Additionally, the claim that the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

*Comment MN20-4*

The comment critiques BCHD's budgetary evaluation system. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

*Comment MN20-5*

The comment expresses grievance with BCHD's fulfillment of California Public Records Act requests and incorrectly states only 3 days of public review were allowed before Project approval. Refer to the response to Comment MN18-1. As described therein, contrary to the assertions in this comment, BCHD has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be

considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

*Comment MN20-6*

The comment claims, without substantial evidence or expert opinion, that the proposed Project ignores negative impacts to the surrounding community including chronic stress, noise, traffic, pollution, and sirens. The comment asserts that the surrounding communities have suffered environmental and economic justice impacts since the operation of the South Bay Hospital District and the existing Beach Cities Health District. Refer to the response to Comment MN19-1. Again, it should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

**Letter MN21**

April 6, 2021
Mark Nelson

*Comment MN21-1*

The comment expresses concern that the proposed Project would cause premature Alzheimer's disease in children and emit harmful emissions, specifically fine particulate matter ($PM_{2.5}$). The comment provides several citations to studies and news articles related to air pollution and adverse health effects on children. However, the references provided in this comment do not support a conclusion that construction or operational emissions of the proposed Project would result in health impacts. For example, as described in the response to Comment FL1-61, which cited the same study the study *The associated of early-life exposure to ambient $PM_{2.5}$ and later-childhood height-for-age in India: an observational study* describes that children in the sample were exposed to an average of 55 micrograms per cubic meter ($\mu g/m^3$) of $PM_{2.5}$ in their birth month. For reference, the construction health risk assessment (HRA) prepared for the proposed Project demonstrates that the maximum unmitigated concentration of $PM_{2.5}$ would be 0.41021 $\mu g/m^3$, whereas the maximum mitigated concentration would be 0.02373 $\mu g/m^3$. These emissions, which would occur temporarily during the Phase 1 construction activities, would represent the maximum $PM_{2.5}$ emissions that could be experienced during construction or operation of the proposed Project. Similarly, the study *Severe Urban Outdoor Air Pollution and Children's Structural and Functional Brain Development, From Evidence to Precautionary Strategic Action*, which was also reference in Comment FL1-61, cites a World Health Organization (WHO) safety cut off of <10 $\mu g/m^3$. Neither construction-related nor operational emissions of $PM_{2.5}$ would approach these values.

None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction HRA prepared for the proposed Project.

**Letter MN22**

*Comment MN22-1*

The comment provides links to the State of California Department of Justice website which provides brief descriptions of the California Environmental Quality Act (CEQA) and Environmental Justice. A link to a search bar on the State of California Department of Justice website for the term economic justice is also provided. A link to Environmental Justice at the Local and Regional Level Legal Background Factsheet and a link to a page on CalRecycle's website titled *Contents of an Environmental Impact Report* is also provided. The comment claims neighborhoods to the north of the Project site are younger, lower income and are being exploited by the Beach Cities Health District (BCHD) because as renters, they are less likely to be able to mount an effective opposition. The comment goes on to claim, without substantial evidence or expert opinion, that BCHD has weaponized environmental justice.

First, CEQA Guidelines 15131 specifically states *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

However, it should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

**Letter MN23**

April 6, 2021
Mark Nelson

*Comment MN23-1*

The comment expresses the commenter's opinion there is a lack of net positive benefits to override significant impacts from aesthetics, noise, and loss of recreation. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining the

benefits of the proposed Project. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. All other impacts identified in the Environmental Impact Report (EIR) were determined to be either less than significant or less than significant with mitigation.

*Comment MN23-2*

The comment presents written communication from Beach Cities Health District (BCHD) legal counsel and asserts, without substantial evidence, that BCHD misrepresents the benefits of the proposed Project given that the Draft EIR was ongoing and had not yet been published. It should be noted that the purposed of the EIR is to disclose the potential physical environmental impacts associated with the proposed Project to foster public participation and informed decision making. The identification of project benefits does not subvert the California Environmental Quality Act (CEQA) process. In fact, it is called for in CEQA Guidelines Section 15124, which states that *"[t]he statement of objectives should include the underlying purpose of the project and may discuss the project benefits."*

The comment continues by asserting that the City of Redondo Beach would experience 100 percent of the environmental justice impacts. As described in the response to MN17-1, the market study prepared for the proposed Project identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. It should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

*Comment MN23-3*

The comment claims that the MDS Market Study estimates are flawed and unsubstantiated. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

The comment goes on to assert that BCHD has displayed diffidence and defiance to providing responses to California Public Records Act requests. Refer to the response to Comment MN18-1 as well as Master Response 15 – Purpose of Public Review.

*Comment MN23-4*

The comment offers a description of the history of the formation of BCHD, which was originally formed as the South Bay Hospital District, a voter-approved public hospital district. The comment goes on to claim that neither BCHD's mission nor operations have been voter-approved by the three Beach Cities. Again, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment MN23-5*

The comment asserts that the Primary Market Area identified in the MDS Market Study far exceeds BCHD's service area. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. However, the analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

The comment then goes on to provide a series of fragmented quotes from the MDS Market Study and claims these represent an overview of missing information related to key claims by MDS. However, the comment fails to specify how these quotes represent flaws in the study.

*Comment MN23-6*

The comment asserts that the MDS Market Study implied environmental and economic justice impacts in the 90277 zip code. The comment first states that the MDS Research Company, Inc. study assumes less than 5 percent of the Assisted Living residents would be from south Redondo Beach area, which would experience 100 percent of the environmental justice impacts. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. As described in Comment Response MN23-5, the analysis identifies that a large majority (i.e., 70 percent) of the

proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the campus. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

The comment then describes that the south Redondo Beach area has experienced cumulative environmental justice impacts associated with the AES Redondo Beach Power Plant as well as the campus. The comment does not present a clear relationship or describe the nexus of the of impacts associated with the AES Redondo Beach Power Plant and the proposed Project. As previously described it should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. Additionally, it should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

With regard to the claim that BCHD's actions have resulted in economic justice impacts, it is important to note that CEQA requires that the environmental impact analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* CEQA Guidelines Section 15131, also specifically states *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment."*

*Comment MN23-7*

This comment summarizes statements made previously regarding the scope of the Primary Market Area used in the MDS Market Study and the accuracy of the report. The comment again asserts that BCHD has not provided responses to previous California Public Records Act requests. Refer to the response to Comment MN18-1 as well as Master Response 15 – Purpose of Public Review.

*Comment MN23-8*

The comment again asserts that the 90277 zip code would be forced to endure 100 percent of the environmental and economic justice impacts of the Project, while receiving less than 5 percent of

the benefits. Refer to the individual responses to Comment MN23-2, Comment MN23-5, and Comment MN23-6.

**Letter MN24**

*Comment MN24-1*

The comment questions when receipts for received comments will be received and if they will be posted as they are received. It should be noted that Beach Cities Health District (BCHD) established an automated reply to notify commenters that their comment has been received. Many commenters note having received such and automated reply in their comments. Additionally, all comments received during the review periods for the Notice of Preparation NOP and the Draft Environmental Impact Report (EIR) are published on the BCHD website here: https://www.bchdcampus.org/eir. Since their publication, BCHD has not received communication that a comment has been omitted or discarded.

**Letter MN25**

April 6, 2021
Mark Nelson

*Comment MN25-1*

The comment states the issues within the letter reflect areas of known controversy and environmental justice impacts, negative health impacts, and Beach Cities Health District's (BCHD's) communication with the public. The individual issues are addressed in Comment MN25-2 through MN25-36.

*Comment MN25-2*

The comment states that the issues contained within the letter have been submitted to the BCHD Board of Directors, Torrance and Redondo Beach City Councils as public comment for their next meetings, and Torrance and Redondo Beach Planning Commissions. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration.

*Comment MN25-3*

The comment states the submitted comments have been made before during Community Working Group (CWG) meetings. This comment has been received, incorporated into the Final EIR as a

part of the responses to comments, and will be advanced to decision makers for further consideration.

*Comment MN25-4*

The comment states the proposed Project must be described in detail, including project phases, timing, and linkage with other parts of the BCHD campus. The comment also incorrectly states that impacts cannot be determined without understanding of pricing and subsidy policies.

The EIR was prepared pursuant to the California Environmental Quality Act (CEQA) Guidelines and includes thorough, detailed analysis of the proposed Project and physical environmental impacts on various resources, including impacts on air quality, noise, land use compatibility, and hazards and hazardous materials. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion and response to comments regarding the level of detail and adequacy of the described Phase 2 development program.

For issues related to pricing Refer to Master Response 4 – Affordability of the RCFE Assisted Living and Memory Care Units as well as Master Response 6 – Financial feasibility/Assurance. However, it should be noted that while CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to do so if the information *"does not supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about environmental information, is reaffirmed by the courts (Sierra Club v. County of Napa (2004) 121 Cal.App.4th 1490, 1503).

*Comment MN25-5*

The comment states that alternatives to the proposed Project have been only briefly discussed during CWG meetings. The comment claims that the alternatives discussed during the CWG meetings involved land leases, but provides no clarifying details. The description and analysis of alternatives provided in Section 5.0, *Alternatives* meets all requirements set forth in CEQA Guidelines Section 15126.6, which describes:

> *"An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project*

*alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."*

*Comment MN25-6*

The comment states CWG meetings have had limited discussion of the No Project Alternative and requires significant explanation. Refer to the individual response to Comment MN25-6. The discussion and the analysis of the No Project Alternative meets all requirements set forth in CEQA Guidelines Section 15126.6(e).

*Comment MN25-7*

The comment notes that the proposed Project would involve some different uses and operations than currently provided and requests a discussion of purpose and need of the proposed Project be provided, including a discussion regarding revenue generation and affordability associated with the Assisted Living facility. Refer to BCHD Master Response 3 – Project Need and Benefit for analysis of the need and anticipated benefit of development of the proposed Project. As discussed in Master Response 4 – Project Objectives, the Project objectives directly reflect BCHD's primary mission to support community health and wellness by providing needed housing and long-term care to seniors as well as generating revenue to support BCHD's broader range of community health programs and services. Refer to BCHD Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to concerns pertaining to the affordability of Assisted Living and Memory Care units.

*Comment MN25-8*

The comment expresses concern regarding impacts to aesthetics and visual resources related to mass, height, setbacks, artificial lighting, sun reflection, and invasion of the visual privacy of the surrounding homeowners. The comment states simulations, elevations, illustrations, and models would be needed. The EIR provides photosimulations and six representative views in Section 3.1, *Aesthetics and Visual Resources*. The EIR also provides visual renderings of example site plans used to illustrated the Phase 2 development program. Both the photosimulations for Phase 1 as well as the visual renderings for Phase 2 were prepared by licensed architects. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Comment MN25-9*

The comment expresses general concerns, without substantial evidence or expert opinion, regarding operational emissions effects on nearby receptors and requests analysis of operational emissions. The comment also expresses general concerns, again without substantial evidence or expert opinion, for hazardous emissions associated with construction-related traffic and demolition (e.g., particulate matter and asbestos containing material, fugitive dust, etc.) and requests management strategies be implemented during construction. These issues are addressed in detail in Sections 3.2, *Air Quality* and Section 3.8, *Hazards and Hazardous Materials*. This analysis is supported by technical studies and exhaustive quantitative modeling, including the preparation of a construction Health Risk Assessment (HRA) as well as Phase I and Phase II Environmental Site Assessments (ESAs) and follow-up investigations. Refer to Master Response 9 – Air Quality Analysis and Master Response 11 - Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

Mitigation Measure (MM) AQ-1 would require that BCHD prepare and implement an Air Quality Management Plan during all construction-related activities MM HAZ-1 would require BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mold, including invasive physical testing within the buildings proposed for demolition activities. Additionally, the implementation of MM HAZ-2a through -2d would ensure that tetrachloroethylene (PCE) and the other identified volatile organic compounds (VOCs) are properly detected and managed during ground disturbing activities consistent with all applicable Federal and State regulations and guidelines provided by relevant regulatory agencies.

*Comment MN25-10*

The comment asserts the EIR must consider potential attack and disease from urban wildlife such as coyotes, raccoons, opossums, rats, mice, raptors, feral cats, nuisance animals and insects. Issues related to rodents are discussed in the EIR, which notes that *"due to the presence of the Silverado Memory Care Community and associated dining services on the campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus."* However, the comment provides no substantial evidence to suggest that the implementation of the proposed Project would credibly result in attack or disease by urban wildlife. Nevertheless, all on-site landscaping with the perceived potential to attract urban wildlife would be subject to review, input, and approval by the Redondo Beach Building & Safety Division as well as the Torrance Community Development Department for landscaping elements within the City of Torrance right-of-way.

*Comment MN25-11*

The comment expresses general concern regarding long-term energy generation and potential emission hazards or voltage fluctuations. The comment also expresses concern regarding diesel fuel used during construction. As assessed in Section 3.5, *Energy*, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Further, as described in Section 2.5.1.5, *Sustainability Features*, it should be noted that all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed Residential Care for the Elderly (RCFE) Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification. LEED is a national certification system developed by the U.S. Green Building Council (USGBC) to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. The program promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

Detailed discussion and analysis of potential impacts on air quality is presented in Section 3.2, A*ir Quality*. As presented therein, based on exhaustive modeling of construction and operational emissions following approved methodologies adopted by local air quality management agencies, the proposed Project, with implementation of identified mitigation measures, would not generate air quality emissions that would create or contribute to the violation of air quality standards, which are established by Federal and State agencies for protecting the quality of the air and the health of residents of the air basin. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to potential air quality impacts.

*Comment MN25-12*

The comment states that a standard analysis of geotechnical issues should suffice for the proposed Project. Existing geologic and soils hazards at the Project site, including but not limited to liquification, landslides, slope instability, subsidence, and differential settlement, were thoroughly assessed based on the Geotechnical Report prepared by Converse Consultants (2016) and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation, and

California Emergency Management Agency (Cal EMA). The issue of geologic hazards is discussed in detail in Section 3.6, *Geology and Soils* under Impact GEO-1.

*Comment MN25-13*

The comment claims, without substantial evidence or expert opinion, that there may be impacts created by alternative energy generation such as noise or impacts to wildlife from wind turbines or glare and heat islanding from solar panels. The comment requests that plans are disclosed for greenhouse gas (GHG) mitigations. The EIR includes adequate discussion of the construction and operational GHG emissions in Section 3.7, *Greenhouse Gas Emissions and Climate Change* under Impact GHG-1. As shown in Table 3.7-6 and 3.7-7 of the EIR, the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. As such, the proposed Project would not generate GHG emissions that may have a significant impact on the environment.

As described in Section 2.5.1.5, *Sustainability Features*, the proposed Project would incorporate the following sustainable design features:

- Photovoltaic solar panels occupying approximately 25-50 percent of the roof area;
- Solar hot water system to reduce energy use;
- Energy efficient heating, ventilation, and air conditioning (HVAC) systems;
- Operable windows for natural ventilation;
- High-performance building envelope – including thermal insulation;
- Controlled natural lighting and lighting systems designed with occupancy sensors and dimmers to minimize energy use;
- Water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.); and
- Interior materials with low VOC content;
- Plant palette comprised of species adapted to the climate of Southern California;
- High efficiency irrigation system; and
- Pervious paving to promote on-site stormwater infiltration.

Regarding effects from solar panels, the solar panels would be located atop of multi-story buildings and would largely be removed from view of the surrounding area. Additionally, any issues related

to glare would be considered during Planning Commission Design Review pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1806. With regard to potential heat island effects, the comment provides no substantial evidence or expert opinion to suggest that could result in a significant impact associated with the proposed Project. Nevertheless, it should be noted that the proposed Project would include a substantial increase in open space that would provide an overall increase in trees and landscaping onsite and would reduce any potential exiting heat island effects associated with the existing concrete and asphalt surfaces on the Project site.

*Comment MN25-14*

The comment requests disclosure of impacts related to hazards and hazardous materials. These issues are fully assessed in Section 3.8, *Hazards and Hazardous Materials*. Refer also to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment MN25-15*

The comment expresses concern regarding hydrology (e.g., water capture, runoff, and irrigation) impacts, particularly during construction and requests disclosure. These issues are sufficiently analyzed and discussed in Section 3.9, *Hydrology and Water Quality* with analysis supported by hydrology and drainage studies prepared by licensed civil engineers. The comment does not challenge any specific thresholds, methodologies, or findings of this analysis.

*Comment MN25-16*

The comment states a clear understanding of land use is need for the proposed Project as well as the alternatives to the proposed Project. The comment suggests a local vote for any changes in land use from previous use. Refer to the response to Comment MN25-5 and MN25-6 for issues regarding the description and analysis of alternatives provided in Section 5.0, *Alternatives*. Additionally, as described in Section 3.10, *Land Use and Planning*, the campus is designated P (Public or Institutional) land use within the Redondo Beach General Plan. The P designation includes lands that are owned by public agencies, special use districts, and public utilities. Permitted uses under the P land use designation include governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (i.e., schools), cultural (e.g., libraries, museums, performing and visual arts, etc.), human health, human services, public utility easements, and other public uses. The proposed Project would expand existing human health, human services, and recreational facilities which are consistent with the P land use designation and would continue to serve the public. Section 3.10, *Land Use and Planning* provides a detailed analysis of issues related to land use and an assessment of consistency with

applicable land use planning goals, policies, and regulations that govern the use and development of the Project site. Refer also to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

*Comment MN25-17*

The comment claims, without substantial evidence, that operational noise of the existing campus is substantial and expresses concern regarding construction and operation-related noises of the proposed Project. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to noise.

*Comment MN25-18*

The comment references an outdated number for beds under proposed Assisted Living units and requests an assessment of impact to traffic and ancillary services under the proposed Project. The EIR includes analysis under CEQA for community services and population and housing, including Section 3.12, *Population and Housing*, Section 3.13, *Public Services,* Section 3.15, *Utilities and Service Systems,* and Section 4.0, *Other CEQA Considerations*. Refer also to Section 3.14, *Transportation*.

*Comment MN25-19*

The comment requests a private security description be provided and analyzed by local police departments and the Redondo Beach Police Department (RBPD). The comment also requests analysis of impacts to public utility services.

With regard to security, the EIR includes a thorough assessment of potential for the proposed Project to affect law enforcement public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local police protection services. As described Section 3.13, *Public Services* under Impact PS-2, the increase in activity level at the Project site could generate the need for law enforcement services. However, the development under Phase 1 and Phase 2 of proposed Project would include the incorporation of security features such as access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas, and minimum dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of RBMC Section 10-5.1706(c)(10). These measures would be effective in deterring criminal activity at the Project site so any increase in crime would not be substantial. Analysis of public utilities is provided in Section 3.15, *Utilities and Service Systems*.

*Comment MN25-20*

The comment claims the former South Bay Hospital resulted in overflow parking conditions and claims, without substantial evidence, that the existing campus results in unsafe traffic conditions. The comment suggests the modification of the existing transportation system. Section 3.14, *Transportation* provides a thorough discussion of transportation hazards, supported by transportation studies prepared by Fehr & Peers. As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. The analysis did not identify any discernable pattern in collisions to suggests that operations at the BCHD cause unsafe traffic conditions. Additionally, Fehr & Peers did not identify any hazardous conditions associated with the circulation scheme included in the proposed Project.

*Comment MN25-21*

The comment expresses appreciation for the opportunity to participate in public review of the proposed Project. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers

*Comment MN25-22*

The comment expresses general opposition to the proposed Project, noting the height of the proposed development would be taller than structures of the surrounding neighborhood. The comment expresses concern that the height of the proposed development would block views and create privacy issues. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height, visual character, and privacy.

*Comment MN25-23*

The comment makes unsubstantiated claims that the former South Bay Hospital district imposed environmental and economic damages over a 6o-year period. The comment notes the former South Bay Hospital District was approved and funded by public vote and did not include assisted living or similar uses. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment MN25-24*

The comment makes unsubstantiated claims that the former South Bay Hospital district imposed environmental and economic damages over a 6o year period. The comment claims that is favor of economic and environmental justice, the proposed Project must not be operated. The comment further asserts BCHD must stop environmental and economic justice damages, including reduced property values, imposed on the surrounding neighborhoods. As described in Section 3.0, Environmental Impact Analysis and Mitigation Measures, CEQA requires and EIR analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines 15126.2[a] and Public Resources Code Section 21000[a]). CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potential *"physical"* adverse effects of a project. (14 CCR 15358[b]). Property value loss in and of itself is not a physical impact required to be included in a CEQA analysis. Further, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. See Master Response 16-Environmental Justice for further detail.

*Comment MN25-25*

The comment asserts there is no need for BCHD to provide the proposed Assisted Living program as other private entities will meet this demand. The comment asserts BCHD's motivation for providing assisted living facilities is to fund future BCHD programs with unknowns and speculative benefits. The comment states the proposed Project must comply with the Declaration of Helsinki principles of ethics and morality. Refer to Master Response 3 – Project Need and Benefit for analysis of the need and anticipated benefit of development of the proposed Project. Refer also to Master Response 4 – Project Objectives for a detailed discussion on the relationship of the project objectives with BCHD's primary mission to support community health and wellness by providing a broad range of community health programs and services. The Declaration of Helsinki is a statement of ethical principles for medical research involving human subjects, addressed primarily to physicians but encouraged by use for others involved in such research. The proposed Project would provide housing and care to seniors and would not involve medical research or experimentation with human subjects; therefore, the Declaration of Hesinki is not applicable, neither to the proposed Project, nor the CEQA-compliant analysis.

*Comment MN25-26*

The comments states, without substantial evidence, that the implementation of the proposed Project would inflict chronic stress, noise, traffic, particulate matter pollution environmental and economic justice damages on the surrounding neighborhoods. The comment asserts the proposed Project would be immoral according to the Declaration of Helsinki principles. The comment further asserts that the proposed Project must gain public consent before implementation.

Again, the comment fails to provide substantial evidence that would support the assertion that the proposed Project would inflict chronic stress impacts. The comment fails to acknowledge that each of these remaining issues raised in this are addressed in detail within the EIR, with analysis supported by technical studies and exhaustive quantitative modeling prepared by experts in their field. which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. it should be clarified that the EIR identifies one significant and unavoidable noise impact (refer to Impact NOI-1) that would occur for the duration of construction of both phases of the proposed Project, all other resource areas assessed in the EIR determined that impacts would either be less than significant or less than significant with mitigation measures.

As previously described, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue. Regarding Declaration of Helsinki principles, refer to the response to Comment MN25-25.

*Comment MN25-27*

The comment claims there is no need for BCHD to provide Assisted Living facilities as, other private entities will meet this demand. The comment further asserts the proposed Project would not create benefits and would have a negative environmental justice impact. These issues are addressed in the response to Comment MN25-25. As previously described, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to Master Response 16 –Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

*Comment MN25-28*

The comment asserts the existing campus creates imposes environmental and economic justice impacts on surrounding neighborhoods. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to Master Response

16 –Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN25-29

The comment states a facility of similar size to the Kensington Redondo Beach would be adequate to serve the Beach Cities. This comment reflects the commenter's opinion and is not supported by substantial evidence or expert opinion. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

*Comment MN25-30*

The comment states historic operation of the former South Bay Hospital District has created chronic stress impacts to surrounding residents for over 60 years, potentially leading to numerous adverse health effects. However, the comment fails to provide substantial evidence that clearly and directly demonstrates the operation of the former South Bay Hospital District has caused such adverse effects to surrounding neighborhoods. The comment further asserts demolition, construction, and operational activities under the proposed Project would create chronic stress from traffic, noise, pollutants, and psychological stress impacts. The comment's implication that BCHD and the proposed Project would result in chronic stress on the surrounding community during Project construction and operation is unreferenced and unfounded. The comment fails to provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR.

*Comment MN25-31*

The comment states the proposed Project would have severe traffic-related impacts. Refer to Master Response 13 – Transportation Analysis for additional discussion regarding the EIR's analysis of transportation impacts and mitigation measures proposed to reduce such impacts.

*Comment MN25-32*

The comment states vehicle emissions and fugitive dust associated with construction and operation of the proposed Project would create adverse health effects to children and residents, especially the chronically ill. See BCHD Master Response 10 – Air Quality Analysis for discussion on air quality impacts, including on sensitive receptors and mitigation measures that would reduce impacts to a level below significance.

*Comment MN25-33*

The comment states the proposed Project would have severe impacts related to construction and operational noise and vibration. Construction and operational noise is thoroughly discussed in Section 3.11, *Noise* under Impact NOI-1 and Impact NOI-3. This analysis is supported by an extensive quantitative modeling effort. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to this issue.

*Comment MN25-34*

The comment states the proposed Project would have severe impacts related to privacy invasion from the proposed RCFE Building. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to concerns regarding the aesthetic and visual impacts of the Project, including privacy concerns. As described therein, while residential areas would still be visible from some areas of the campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

*Comment MN25-35*

The comment states the proposed Project would have severe aesthetic impacts related to blocked views and outdoor lighting. These issues are analyzed in detail in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the aesthetic and visual impacts of the Project, including compatibility of the Project design and height with the visual character of the surrounding neighborhood, views of the Palos Verdes Hills, skyline views, and glare and lighting.

*Comment MN25-36*

The comment claims, again without substantial evidence, that the surrounding neighborhoods have endured environmental and economic justice impacts from operation of the former South Bay Hospital and existing campus The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue. The comment states implementation of the proposed

Project would substantially reduce the quality of life for surrounding residents. The comment further asserts because local neighborhoods were note provided the quid pro quo for informed consent the proposed Project is unethical according to the Declaration of Helsinki and expresses opposition towards the proposed Project. Refer to Comment MN25-25 for a discussion on non-applicability of the Declaration of Helsinki to the proposed Project and the CEQA process.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter MN26**

April 11, 2021
Mark Nelson

*Comment MN26-1*

The comment requests written evidence regarding seismic hazards of the Beach Cities Health Center. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

**Letter MN27**

April 13, 2021
Mark Nelson

*Comment MN27-1*

The comment references a sign in the Beach Cities Health Center that describes the number of votes for and against funding the South Bay Hospital District in 1956 and asserts that the Beach Cities Health District (BCHD) misinterprets the data in order to mislead the public. This comment does not address to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment MN27-2*

The comment asserts that there were 120 height-related comments and 73-construction duration-related comments on the Project (assuming during the public scoping period, although this is not specified in the comment). As described in detail in Master Response 9 – Aesthetics and Visual Resources, several community concerns were weighed when designing the Project site plan analyzed in the EIR, including building height, density of development, the proximity of the

proposed development to adjacent single- and multi-family residential land uses, views of the proposed buildings from the surrounding residential neighborhoods, and the duration of construction as well as potential impacts related to air quality, hazards and hazardous materials, noise, and construction vehicle traffic given the adjacency of the Residential Care for the Elderly (RCFE) Building to the single-family neighborhood to the east within the City of Torrance. The comment fails to acknowledge that while many public scoping comments did not directly specify the construction duration, BCHD') decision to shorten the construction duration substantially reduced associated construction-related impacts, including impacts to related to air quality, hazards and hazardous materials, noise, and construction vehicle traffic.

*Comment MN27-3*

The comment claims that the EIR does not assess a maximum elevation on West 190th Street. With regard to maximum elevation views along West 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190th Street that provide slightly elevated views – including the intersection of Prospect & West 190th Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource.

*Comment MN27-4*

The comment asserts that BCHD must develop noise barriers that are at least as tall as those for the Legado Redondo development although the comment does not specify the height of the referenced noise barriers. As described in detail under Impact NOI-1 in Section 3.11, *Noise*, the feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership. Noise barriers are most commonly developed to a height of between 10 and 30 feet. Mitigation Measure (MM) NOI-1 requires the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division and the Torrance Building & Safety Division for activities occurring within the City of Torrance right-of-way. The specific height of the noise barriers would be finalized in coordination with these entities.

*Comment MN27-5*

The comment asserts that no codes or ordinances require demolition of the Beach Cities Health Center. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill

(SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential public safety hazard for future building tenants, patients, and residents, the BCHD Board of Directors prioritized elimination of seismic-related hazard in concert with the proposed redevelopment of the Healthy Living Campus.

*Comment MN27-6*

The comment claims that only 0.3 percent of the Beach Cities Health Center is 75 feet tall, while the majority of the building is between 32 and 35 feet. The EIR accurately describes the varying heights of different portions of the building in Section 2.2.3, *Existing Project Site*. As discussed therein, *"[t]he north low rise portion of the building is 1 story tall, the north tower is 4 stories tall (plus the equivalent of a 2-story rooftop projection), and the south tower is 5 stories tall (plus the equivalent of a 1-story rooftop projection), with a parapet structure (i.e., elevator shaft) reaching up to a height of 76 feet above the campus ground level and 112.5 feet above the vacant Flagler Lot below."*

*Comment MN27-7*

The comment describes the height and square footage of various iterations of the Project site plans. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

*Comment MN27-8*

The comment claims that *"it is safe to conclude that comments during the business 3 days between June 12 and 17th did not include increasing the height and above ground sqft of the proposed campus - and - BCHDs outcome therefore ignores public input."* The BCHD Board of Directors has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

*Comment MN27-9*

The comment states that the MDS Research Company, Inc. study assumes less than 5 percent of the Assisted Living residents would be from the south Redondo Beach area, which the comment claims has suffered 60 years of negative impacts from the former South Bay Hospital District and BCHD operations. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed

Project. As described in Comment Response MN23-5, the analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the campus. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

*Comment MN27-10*

The comment asserts that residents of the City of Redondo Beach are expected to comprise 8 percent of the tenants of the proposed Assisted Living units and Memory Care units and that the net benefits are negative. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project.

*Comment MN27-11*

The comment suggests that there is no evidence that the benefits of the Project to the three Beach Cities outweighs the construction and operational impacts and that any benefits to residents of Manhattan Beach and Hermosa Beach are irrelevant to the issuance of a Conditional Use Permit by either the City of Redondo Beach or the City of Torrance. Refer to Master Response 3 – Project Need and Benefits, which provides a detailed discussion and response to comments pertaining to the proposed benefits of the Project.

*Comment MN27-12*

The comment claims that BCHD proposes a commercially developed and financed project with high-profit, market-based rents in order to avoid a public vote. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, Master Response 6 – Financial Feasibility/Assurance, and Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

*Comment MN27-13*

The comment asserts that the proposed Project is misrepresented and likely to fail given a lack of benefits compared to impacts. The comment again claims that the 90277 zip code area has experienced disproportionate impacts as compared to the benefits for both 90277 and all of Redondo Beach together. The comment continues by demanding a plan of restitution and an increase in local benefits to the neighborhoods surrounding the Project site as well as the entirety

of Redondo Beach. Refer to Master Response 3 – Project Need and Benefits, which provides a detailed discussion and response to comments pertaining to the proposed benefits of the Project.

**Letter MN28**

April 14, 2021
Mark Nelson

*Comment MN28-1*

This comment letter contains a link to a video that offers a series of alternative locations to be considered as representative view locations than the six representative view locations included in the EIR. Refer to Master Response 9 – Aesthetics and Visual Resources for a description of how and why the representative views were selected. As provided in California Environmental Quality Act (CEQA) Guidelines Section 15204, *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."*

**Letter MN29**

April 16, 2021
Mark Nelson

*Comment MN29-1*

This comment provides a link to a video of Beach Cities Health District (BCHD) Chief Executive Officer (CEO) Tom Bakaly explaining that BCHD has a moral obligation to eliminate seismic safety and other hazards of the former South Bay Hospital Building. The comment then goes on to list a series of hypothetical questions regarding BCHD's moral obligation to protect the people. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

As a matter of approach throughout the EIR and consistent with California Environmental Quality Act (CEQA) Guidelines 15064.7, the thresholds of significance discussion for each of the environmental issue areas first considered the questions presented in Appendix G of the CEQA Guidelines. Then any adopted or commonly used thresholds from the City of Redondo Beach and the City of Torrance were considered, given the role of these cities as responsible agencies. Finally, any relevant quantitative thresholds were considered including those published by relevant regulatory agencies, or those used by other local jurisdictions within the Greater Los Angeles Area.

## Letter MN30

April 17, 2021
Mark Nelson

*Comment MN30-1*

The comment references a civil settlement between Wood Environment & Infrastructure Solutions, Inc. and Scottish prosecutors. The comment does not address adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

*Comment MN30-2*

The comment claims the six project objectives lack a foundational basis. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to this issue.

*Comment MN30-3*

The comment claims that because there is no legal requirement for the demolition of the Beach Cities Health Center, the purpose and need of the proposed Project and No Project Alternative lack foundational basis. Contrary to the assertion in the comment, the discussion and the analysis of the No Project Alternative meets all requirements set forth in CEQA Guidelines Section 15126.6(e).

*Comment MN30-4*

The comment states that the proposed Project is taller and occupies a greater square footage than project designs of the 2019 Master Plan. The comment states the height of the proposed Residential Care for the Elderly (RCFE) Building would create significant aesthetic impacts and notes a previous Legando Redondo development was assessed using average height. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height. As described in the response to Oral Comment MN1-6, the comment claims that the City of Redondo Beach uses average height to determine aesthetics and visual impacts; however, the EIR for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 2013121065) as well as the EIR for The Waterfront (SCH No. 2014061071) review the maximum building height in the context of consistency with the Redondo Beach Municipal Code (RBMC). The analysis of visual character provided in Impact VIS-2 is consistent with this approach.

*Comment MN30-5*

The comment states the proposed increase in building height would create shading effects to surrounding neighborhoods, recreation areas, and roadways. Refer to Master Comment 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows.

*Comment MN30-6*

The comment states 85 dBA intermittent noise would have a significant negative impact to receptors at Towers Elementary School. The comment asserts average sound level is not the appropriate metric for analysis. Refer to Master Response 12 – Noise Analysis. It should be noted that as provided in Table 3.11-16 and Table 3.11-17, construction-related noise-levels experienced at Towers Elementary School would not exceed the Federal Transit Authority (FTA) thresholds..

**Letter MN31**

April 17, 2021
Mark Nelson

*Comment MN31-1*

The comment states *"Ms. Egan is correct that BCHD should not be electively demolishing the 514 building."* Refer to the individual response to Oral Comment BE-3.

**Letter MN32**

April 16, 2021
Mark Nelson

*Comment MN32-1*

The comment provides an excerpt from a Wall Street Journal Article titled *John Wood to Pay 9-million to Settle with Scottish Prosecutors.* The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

**Letter MN33**

April 26, 2021
Mark Nelson

*Comment MN33-1*

The comment claims that the market study prepared by MDS Research Company, Inc. and peer reviewed by Cain Brothers is biased due to financial incentives from Beach Cities Health District (BCHD). The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

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**Letter MN34**

April 26, 2021
Mark Nelson

*Comment MN34-1*

The comment claims that the Beach Cities Health District (BCHD) held secret negotiations with the City of Redondo Beach. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review. The comment also claims that BCHD approved their own Project. The BCHD Board of Directors has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

*Comment MN34-2*

The comment claims that the BCHD allowed only three business days of public review and comment prior to approval by the BCHD Board of Directors. Refer to the response to Comment MN34-1, the BCHD Board of Directors has not approved the proposed Project.

*Comment MN34-3*

The comment claims that the proposed Project has increased in size since the 2019 site plan was released to the public. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of previous revisions to the proposed Healthy Living Campus Master Plan.

*Comment MN34-4*

The comment again claims that BCHD negotiated in secret with the City of Redondo Beach, in order to change the land use designations and avoid a public hearing for a Conditional Use Permit

(CUP). It should be noted that the proposed Project does not involve any land use changes. The requirement for a CUP is clearly described in Redondo Beach Municipal Code (RBMC) Section 10- 2.1110. Additionally, the need for a CUP is listed under Section 1.5, *Required Approvals*.

*Comment MN34-5*

The comment expresses concern regarding the affordability of the assisted living units and claims that Redondo Beach residents would bear the brunt of environmental justice impacts. Refer to Master Response 3 – Project Need and Benefit, Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, and Section 16 – Environmental Justice.

*Comment MN34-6*

The comment claims that BCHD has acted unethically and requests that no zoning change be permitted for the proposed Project. Refer to the response to MN34-4 as well as Master Response 7 – Project Compatibility with P-CF Zoning Land Use Designation.

**Letter MN35**

April 28, 2018
Mark Nelson

*Comment MN35-1*

The comment raises concerns about exposure to noise and cites a study prepared by Willy Passchier-Vermeer and Wim F. Passchier regarding long-term noise exposure and associated health effects. Specifically, this study considered long-term exposure (i.e., for a period of over one or more years) to occupational and operational sources of noise. The term *"construction"* does not appear throughout the entire study, which is titled Noise Exposure and Public Health and is available here: https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123. As described in Section 3.11, *Noise*, while the proposed Project would result in significant and unavoidable impacts associated with construction noise levels at nearby residential receptors, operational noise associated with the Project would be less than significant with the implementation of Mitigation Measure (MM) NOI-2 and MM NOI-3a through -3b. The comment fails to identify the relationship between the proposed Project and the cited article.

**Letter MN36**

April 28, 2021
Mark Nelson

*Comment MN36-1*

The comment raises concerns about exposure to noise, particularly in children, and cites a study prepared by Maria Klatte, Kirstin Bergström, and Thomas Lachmann regarding long-term noise exposure and associated effects on cognitive performance in children. As described for the study cited in Letter MN35, this study considered long-term exposure (i.e., for a period of over one or more years) to occupational and operational sources of noise, such as aircraft noise. The term construction does not appear throughout the entire study, which is titled *Does noise affect learning?* A short review on noise effects on cognitive performance in children and is available here: ht https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/. As described in Section 3.11, *Noise*, operational noise associated with the proposed Project would be less than significant with the implementation of Mitigation Measure (MM) NOI-2 and MM NOI-3a through -3b. Further, while the proposed Project would result in significant and unavoidable impacts associated with construction noise levels at nearby residential receptors, construction noise levels would not exceed applicable FTA thresholds at Towers Elementary School (refer to Table 3.11-16 and Table 3.11-17). (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) The comment fails to identify the relationship between the proposed Project and the cited article.

**Letter MN37**

April 29, 2021
Mark Nelson

*Comment MN37-1*

The comment states a previous public information request to Beach Cities Health District (BCHD) regarding providing a specific citation for a statement on BCHD's website inhibits intelligent public participation. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

**Letter MN38**

April 29, 2021
Mark Nelson

*Comment MN38-1*

The comment states a previous public information request to BCHD regarding Blue Zone programming's relationship to community wellbeing failed to mention causality and therefore, inhibits intelligent public participation. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

**Letter MN39**

April 30, 2021
Mark Nelson

*Comment MN39-1*

The comment makes an inquiry regarding the most appropriate method of sending a large comment letter. These are note comments on the adequacy or technical sufficiency of the environmental impact analysis, mitigation measures, and/or alternatives presented in the Environmental Impact Report (EIR).

**Letter MN40**

*Comment MN40-1*

The comment incorrectly states that the Environmental Impact Report (EIR) is delinquent in its written standards in general for the evaluation of impacts. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation study, human health risk assessment, etc.). Comments regarding the environmental issues presented in the Draft EIR have been responded to in detail within these responses to comments. Text revisions to the Draft EIR have also been included in the Final EIR in response to comments.

Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to seismic safety.

**Letter MN41**

April 30, 2021
Mark Nelson

*Comment MN41-1*

The comment expresses concern regarding the safety impacts associated with the proposed Southern California Edison (SCE) substation. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for a detailed discussion and response to comments pertaining to this issue. The comment also cites a news article about a man whose car toppled a light pole and a fire hydrant resulting in electrocutions. However, it is not the responsibility of the Environmental Impact Report (EIR) to speculate on such unique and unpredictable accidents.

**Letter MN42**

May 3, 2021
Mark Nelson

*Comment MN42-1*

The comment makes a California Public Records Act Request to Beach Cities Health District (BCHD) concerning documents associated with a list and cost of renovation activities required to accommodate future tenants of the Beach Cities Health Center as well as documents describing the impacts resulting from the reduction of BCHD health and wellness programs. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

**Letter MN43**

May 4, 2021
Mark Nelson

*Comment MN43-1*

The comment makes a California Public Records Act Request to Beach Cities Health District (BCHD) regarding the passage in H&SC Section 32121 that authorizes BCHD to operate a Residential Care for the Elderly (RCFE) facility.

These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, for decades, BCHD has utilized

public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. As provided in H&SC Section 32121(j), under State law, healthcare districts are empowered *"[t]o establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services, including, but not limited to, outpatient programs, services, and facilities; retirement programs, services, and facilities; chemical dependency programs, services, and facilities; or other health care programs, services, and facilities and activities at any location within or without the district for the benefit of the district and the people served by the district."* It should also be noted that at least one other California Health District – the Salinas Valley Memorial Hospital District – also operates 72 assisted living beds (see the Salina Valley Memorial Hospital District website here: https://www.svmh.com/about-us/affiliates-partnerships/).

Additionally, all elements of the proposed Healthy Living Campus Master Plan would comply with local zoning regulations. Consistency with the City of Redondo Beach and City of Torrance General Plans is discussed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5.

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**Letter MN44**

May 4, 2021
Mark Nelson

*Comment MN44-1*

The comment includes a photosimulation excerpted from Section 3.1, *Aesthetics and Visual Resources*. The comment states that because foliage that either does not currently exist or will not be removed during construction is represented in the photosimulation, the photosimulation is deliberately misleading. The comment then requests that photosimulations containing the non-existent foliage be removed from the EIR and the EIR be recirculated.

The foliage represented in the photosimulations, like the buildings also represented in these photosimulations, do not currently exist because they are intended to represent what future development would look like after construction is complete. As described in Section 3.3, *Biological Resources* and Section 3.10 *Land Use and Planning*, future development at the Project site would include landscaping plans that would replace vegetation removed during construction

with new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal Code (RBMC) Section 10-5.1900. Additionally, the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent with the Torrance Street Tree Master Plan. As such, because new trees and landscaping would be included in the final development, it is more accurate for visual aids to include landscaping than to omit foliage entirely.

**Letter MN45**

May 6, 2021
Mark Nelson

*Comment MN45-1*

The comment states that Beach Cities Health District (BCHD) increased the height of the Project since the 2019 site plan and moved the below ground parking from the 2019 site plan to an above ground parking structure. Refer to Master Response 9 – Aesthetics and Visual Resources for a summary of previous revisions to the proposed Healthy Living Campus Master Plan.

**Letter MN46**

May 6, 2021
Mark Nelson

*Comment MN46-1*

The comment incorrectly claims that the petition of resident signatures has been ignored by Beach Cities Health District (BCHD) and that BCHD misstated the Areas of Known Controversy in the EIR. Under California Environmental Quality Act (CEQA) Section 15123(b)(2) an EIR shall identify *"[a]reas of controversy known to the Lead Agency, including issues raised by agencies and the public."* Section 1.8, *Areas of Known Controversy* provides a thorough discussion of the community concerns raised during extensive public scoping meetings for the proposed Project. This summary inclusion of areas of public controversy is intended to identify specific issues, including environmental physical environmental effects, that should be addressed in the EIR. It should be noted that the petition is incorporated as part of the public comments in the Final EIR (refer to Letter BW2).

**Letter MN47**

May 6, 2021
Mark Nelson

*Comment MN47-1*

The comment claims that only 0.3 percent of the Beach Cities Health Center is 75 feet tall, while the majority of the building is between 32 and 35 feet. Refer to the response to Comment MN-27 and Comment MN30-4.

**Letter MN48**

May 6, 2021
Mark Nelson

*Comment MN48-1*

The comment claims that the proposed Project would violate City of Redondo Beach Residential Design Guidelines for the Beryl Heights Neighborhood and would therefore, have an adverse impact to neighborhood character. The comment concludes the EIR must be revised and recirculated. The comment also includes an attachment of the excerpted Neighborhood Specific Guidelines for the Avenues and Beryl Heights Neighborhood from the Residential Design Guidelines. However, the neighborhood maps contained in the excerpt clearly show that the Project site is not located in either the Avenues or Beryl Heights Neighborhood. The Residential Design Guidelines, identify the Beryl Heights Neighborhood as the single-family neighborhood west of Prospect Avenue. The Project site contains two parcels zoned as P-CF and C-2 and is located east of Prospect Avenue.

**Letter MN49**

May 6, 2021
Mark Nelson

*Comment MN49-1*

The comment asserts that Beach Cities Health District (BCHD) misidentifies itself as a leading preventive health agency and its year of founding. The comment also critiques BHCD's apparent lack of financial analysis. The comment provides an excerpt from Section 1.2, *Lead Agency*, that describes BCHD services and the district's mission. The comment states the excerpt is deceptive and contains typos and grammatical errors but fails to identify specific typos, grammatical errors, or provide any clarifying detail on how or why the excerpt is deceptive. As provided at BCHD's website: *"Beach Cities Health District (BCHD) is a healthcare district focused on preventive health and serves the communities of Hermosa Beach, Manhattan Beach and Redondo Beach. Established in 1955 as a public agency, it offers an extensive range of dynamic health and wellness programs, with innovative services and facilities to promote health and prevent diseases across*

*the lifespan."* These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in State CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

**Letter MN50**

May 6, 2021
Mark Nelson

*Comment MN50-1*

The comment correctly identifies the City of Redondo Beach as a permitting authority for the required Conditional Use Permit (CUP), but states this fact discredits Table 3.1-1 which summarizes the heights of the tallest buildings in the Beach Cities and Torrance. The comment claims the only relevant heights that should be represented in this table are seven other P-CF (Community Facilities) zoned structures located in Redondo Beach and all other listed structures should be removed. The comment makes an unsubstantiated claim that buildings over 70 feet have been banned in Redondo Beach since 1980. Identifying buildings of comparative height in the area is relevant to the visual character of the region. The Redondo Beach Municipal Code (RBMC) does not specify building heights or floor area ratios (FARs) for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). Refer also to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

**Letter MN51**

May 6, 2021
Mark Nelson

*Comment MN51-1*

The comment claims that the proposed Project would have a significant impact on aesthetics resources including impacts on skyline views, glare, and neighborhood character. The comment disagrees with the finding that the implementation of the proposed Project would not substantially degrade the surrounding visual character from Representative View 1. However, contrary to the

commenter's assertion that this finding is not supported, the analysis of potential impacts to visual character from this location is substantiated by the photosimulation provided for Representative View 1, which shows that existing ornamental vegetation and rooflines of residences would largely obscure the proposed development and the vast majority of open sky views above the single-family residences would remain. Refer to Master Response 9 - Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to visual character. The comment also references neighborhood characteristics as defined by the Beryl Heights published design guidelines. However, as described in the response to Comments MN48-1, the Project site is not located within the Beryl Heights Neighborhood.

The comment also briefly claims, without substantial evidence or expert opinion, that the proposed Project would result in glare and noise reflection. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis and Master Response 12 – Noise Analysis for discussion on impacts of both construction and operation of the proposed Project.

**Letter MN52**

May 6, 2021
Mark Nelson

*Comment MN52-1*

The comment states the Environmental Impact Report (EIR) has not identified mitigation or management plan for second hand smoke and fails to identify it as a toxic air contaminant (TAC). As described in the response to Comment FL1-3, while second hand smoke may be locally regulated, it is not emitted in substantial quantities or for such a duration that that it would result in long-term health impacts to adjacent sensitive receptors. Nevertheless, the Beach Cities Health District (BCHD) is and would continue to be responsible for complying with Ordinance No. 0-3193-19. Noncompliance with this ordinance or any other local ordinance or regulations could be subject to enforcement action from the relevant regulatory agencies.

**Letter MN53**

May 6, 2021
Mark Nelson

*Comment MN53-1*

The comment provides an excerpt from an unknown origin regarding what is presumed to be community members agreeing that the proposed Project should focus on Safety First. The comment states the excerpt is inaccurate and there is no need to retrofit. This comment makes no

reference to the EIR and does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

**Letter MN54**

May 6, 2021
Mark Nelson

*Comment MN54-1*

The comment suggests demolition of buildings that do not meet current seismic requirements is unnecessary and attempts to discredit the Environmental Impact Report's (EIR's) finding that the South Bay Hospital presents a public safety hazard. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. Again, it should be noted that Beach Cities Health District (BCHD) has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

**Letter MN55**

May 6, 2021
Mark Nelson

*Comment MN55-1*

The comment claims that the project objectives are overly restrictive by requiring Beach Cities Health District (BCHD) operations to continue on a common campus, which precludes detailed analysis of the Development on an Alternative Site in Section 5.0, *Alternatives*. As described in the Environmental Impact Report (EIR), it should be noted that none of the potential alternate sites within the Beach Cities are under ownership or management of BCHD, and it would be

economically infeasible for BCHD to purchase a new site for the proposed development. As described in CEQA Guidelines Section 15126.6(f)(3), *"[a]n EIR need not consider an alternative…whose implementation is remote and speculative."* Refer to Master Response 4 – Project Objectives for a detailed discussion and a response to comments pertaining to the adequacy of the project objectives.

**Letter MN56**

May 6, 2021
Mark Nelson

*Comment MN56-1*

The comment again suggests Beach Cities Health District (BCHD) purchase a new site in another location for the proposed development and claims that BCHD intends to import tenants from outside of the 90277 zip code, while 90277 residents would receive less than 5 percent of benefits from the proposed Project. Three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach specifically identify that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. It should also be noted that revenue generated by the uses under Phase 1 – including the proposed Assisted Living program – would support BCHD's broader range of community health programs and services provided to the Beach Cities and the nearby South Bay communities. For a detailed discussion and response to comments pertaining to the benefits of the proposed Project refer to Master Response 3 – Project Need and Benefit.

**Letter MN57**

May 6, 2021
Mark Nelson

*Comment MN57-1*

The comment states the Draft Environmental Impact Report (EIR) is incomprehensible, including project alternatives due to material numbering and omission errors. It has been noted that Table ES-2 and Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in Tables ES-2 and 5.5-5. No other material number or omission errors occur with regard to the Project Alternatives in Section 5.0, *Alternatives*. It should also be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

## Letter MN58

May 6, 2021
Mark Nelson

*Comment MN58-1*

The comment states the Environmental Impact Report (EIR) is defective and Phase 2 is insufficiently described. The comment also states the Wellness Pavilion does not have an accurate, finite, and stable description. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, regarding the approach to the programmatic analysis of the Phase 2 development program. The EIR evaluates the potential physical environmental impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. The analysis of the proposed Phase 2 development program meets the requirements of CEQA Guidelines Section 15165.

## Letter MN59

May 6, 2021
Mark Nelson

*Comment MN59-1*

The comment states that the Environmental Impact Report (EIR) is defective and must be remediated and recirculated due to failure to disclose significant areas of public controversy. The comment also notes that topics of controversy and supporting citations are included in the following comments. Under California Environmental Quality Act (CEQA) Section 15123(b)(2) an EIR summary shall identify *"[a]reas of controversy known to the Lead Agency, including issues raised by agencies and the public."* Section 1.8, *Areas of Known Controversy* provides a thorough discussion of the community concerns raised during extensive public scoping meetings for the proposed Project. This summary inclusion of areas of public controversy is intended to identify specific issues, including environmental physical environmental effects, that should be addressed in the EIR.

*Comment MN59-2*

The comment reiterates claims that the EIR fails to sufficiently describe areas of known controversy. Refer to the response to Comment MN59-1.

*Comment MN59-3*

The comment notes that BCHD is currently not under legal obligation to retrofit the Beach Cities Health Center and asserts that BCHD must apply a moral obligation uniformly to protect surrounding neighborhoods. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to seismic safety.

*Comment MN59-4*

The comment states the EIR applies minimum CEQA standards, but provides no definition or further clarification of this assertion. The comment also incorrectly states the EIR ignores noise and vibration impacts to sensitive receptors at Towers Elementary School. This issue is clearly addressed in detail in Section 3.11, *Noise* under Impact NOI-1. The comment further asserts the EIR ignores chronic stress impacts related to traffic and emergency vehicles, however, as described in the response to Comment MN19-1, the comment fails to provide evidence or expert opinion that substantial chronic stress impacts would occur under the proposed Project.

*Comment MN59-5*

The comment claims the EIR has ignored concerns related to nighttime lighting and glare, elevation-amplifying visual impacts; impacts related to the relocation of structures; size and height of proposed structures. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, the proposed Healthy Living Campus Master Plan has gone through reiterations and redesigns in response to received community feedback. Refer to Master Response 9 – Aesthetics and Visual Resources. Further, the analysis provided in Section 3.1, *Aesthetics and Visual Resources* takes elevation differences into account when analyzing impacts. The comment includes citations to various articles describing links between nighttime lighting and cancer, depression, ecological damages, sleep deprivation and weight gain; glare with fatigue and death rays; and shade and shadow effects with but none of the referenced citations conflict with or challenge any specific findings of the EIR analysis. Many of these studies are also referenced specifically and responded to in detail in Letter TRAO and Letter FL1. For example, refer to the response to Comment TRAO-132 regarding glare.

The potential operational impacts on nighttime lighting are discussed in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3. Given that construction activities at the BCHD campus would occur between the hours of 7:30 a.m. and 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday, exterior construction lighting would generally not be required. If necessary, during the winter when the sun sets earlier or if otherwise necessary for security purposes, lighting would be shielded and directed into the interior of the Project site.

Security fencing and the noise barriers required under Mitigation Measure (MM) NOI-1 would screen light sources from view of nearby sensitive receptors (e.g., neighboring single- and multi-family residences) and other passersby. Thus, temporary lighting associated with construction activities would not adversely affect daytime or nighttime views in the area.

The proposed Project would increase lighting associated with interior building illumination and outdoor lighting for nighttime security and wayfinding around and through the campus. Interior lighting would be designed with occupancy sensors and dimmers, where feasible and appropriate. Additionally, during the evening hours, interior lighting associated with the Assisted Living and Memory Care units would be muted as a result of interior blinds, curtains, and other shades. Outdoor ground floor illumination would be limited to the entry plaza, outdoor seating areas, and pedestrian pathways. Lighting in these areas would be low lying and directed toward the ground. As such, outdoor ground lighting would generally be contained within interior spaces of the Project site. Exterior outdoor lighting would also be further muted by proposed landscaping along the perimeters of the Project site.

It should be noted that the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. During this review, the proposed lighting as well as the other reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare consistent with the requirements of the RBMC.

*Comment MN56-6*

The comment notes that the EIR addresses construction related air quality and noise impacts to on-site and adjacent sensitive receptors. However, the comment states numerous comments express concern regarding air quality impacts to receptors not immediately adjacent to the Project site, including surrounding schools. The comment also specifies concerns regarding air quality impacts related to operational emissions and traffic emissions. The EIR assesses the impacts associated with air pollutant emissions from construction and operation of the proposed Project within the broader Source Receptor Area (SRA) 3, which covers southwestern coastal Los Angeles County, as well as nearby sensitive receptors. Regional and localized air quality significance thresholds were designed as a screening tool to avoid air quality violations. As shown in Table 3.2-4 the EIR clearly considers adjacent recreational land uses and schools – including schools. Impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are

addressed in Impact AQ-3. With the implementation of MM AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to this issue.

The comment also includes citations to various studies, literature reviews, and article related to the association of particulate matter and general air pollution with health effects such as cardiovascular disease, Alzheimer's disease, and asthma. The references provided in this comment do not support a conclusion that construction or operational emissions would result in health impacts. For example, as also described in the response to Comment MN21-1 the study *The associated of early-life exposure to ambient $PM_{2.5}$ and later-childhood height-for-age in India: an observational study* describes that children in the sample were exposed to an average of 55 micrograms per cubic meter ($\mu g/m^3$) of $PM_{2.5}$ in their birth month. For reference, the construction Health Risk Assessment (HRA) demonstrates that the maximum unmitigated concentration of $PM_{2.5}$ would be 0.41021 $\mu g/m^3$, whereas the maximum mitigated concentration would be 0.02373 $\mu g/m^3$. These emissions, which would occur temporarily during the Phase 1 construction activities, would represent the maximum $PM_{2.5}$ emissions that could be experienced during construction or operation of the proposed Project. Similarly, the *study Severe Urban Outdoor Air Pollution and Children's Structural and Functional Brain Development, From Evidence to Precautionary Strategic Action* cite a World Health Organization (WHO) safety cut off of <10 $\mu g/m^3$. Neither construction-related nor operational emissions of $PM_{2.5}$ would approach these values. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment or the analysis provided in Section 3.2, *Air Quality*.

*Comment MN59-7*

The comment states the EIR does not address concerns related to displaced wildlife and vermin infesting nearby schools and homes following project construction. As descried in Comment FB1-7, issues related to rodents are discussed in the EIR, which notes that *"[d]ue to the presence of the Silverado Memory Care Community and associated dining services on the campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus."* In light of this ongoing program, assertions that the proposed Project would result in vermin infestations is unfounded and speculative.

*Comment MN59-8*

The comment states the EIR does not address concerns relating to nuclear and radioactive medical waste. As described in Section 3.8, Hazards and Hazardous Materials, and summarized in Master Response 11 – Hazards and Hazardous Materials Analysis, the prepared Phase I Environmental Site Assessment (ESA) identified potential sources of contamination. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Neither of these ESAs identified nuclear or radioactive wastes as occurring on the Project site. All hazardous materials used operationally on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. The proposed Project would be subject to all of the requirements set forth in Chapter 4 (Small Quantity Generator Requirements) of the H&SC Medical Waste Management Act. Adherence to medical waste regulations for small quantity generators would ensure that impacts related to the storage, transport, and disposal of medical waste would be less than significant.

*Comment MN59-9*

The comment states that the EIR has not addressed concern for harmful noise and vibration impacts affecting children at Towers Elementary School. The comment includes citation to various studies describing the relation between noise exposure and attention in the classroom and public health. It should be noted that not all of the provided links were functional, as some did not lead to a specific article but the search page of ResearchGate.net. None of the referenced citations conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise*. For example, results of the study The *Effect of Noise Exposure on Cognitive Performance and Brain Activity Patterns* found that mental workload and visual/auditory attention is significantly reduced when the participants are exposed to noise at 95 dBA level. The EIR discloses Occupational Safety and Health Administration (OSHA) and the California Division of Safety and Health identify the eight-hour 90 dBA limit for defining when impacts on human health would occur. The EIR also includes the Federal Transit Authority (FTA) has stated that an 8-hour $L_{eq}$ of 80 dBA and a 30-day average of 75 $L_{dn}$ is a reasonable criterion for assessment of construction activities on residential land use. The EIR includes adequate discussion of the potential impacts on sensitive receptors, including Towers Elementary School, and mitigation of construction-related noise and vibration both on- and off-site in Section 3.11, *Noise* under Impact NOI-1 and Impact NOI-2. As presented therein, the proposed construction activities during both Phase 1 and Phase 2 would have significant impacts to noise-sensitive receptors for the duration of the construction phases, because the projected $L_{eq}$ would exceed the Residential criteria (8-hour $L_{eq}$ of 80 dBA and 30-day average $L_{dn}$

of 75 dBA). To reduce the impacts of excessive construction noise on surrounding land uses, MM NOI-1 (preparation and implementation of a Construction Noise Management Plan) and MM NOI-2 (haul and delivery truck operations utilizing Lane 1 [the lane farthest from residences] along the given haul route) are identified. Haul trucks typically generate traffic noise levels of 85 dBA $L_{max}$ at 50 feet. However, revision of the haul routes as described in Master Comment Response 10 would further reduce noise impacts from heavy haul truck trips at Towers Elementary School.

*Comment MN59-10*

The comment incorrectly states the EIR mistakenly addresses public service demands, as a population and housing impacts. Section 3.12, *Population and Housing*, analyzes potential impacts to population, employment opportunities, and housing stock that could result from the implementation of the proposed Project. Section 3.13.4, *Project Impacts and Mitigation Measures – Fire Protection*, includes calculated analysis that implementation of the proposed Project would generate an estimated total of 244 emergency calls per year following the completion of the proposed development under Phase 1. The comment also provides citations to various articles on the subject of chronic stress, how stress can affect health, various environmental factors associated with insufficient sleep and sleep disorders. These citations are presumably, intended to be considered in relation to sirens associated with emergency response at the Project site. However, both the comment and the citations fail to articulate and clear or direct relation to the proposed Project. For example, The acute physiological stress response to an emergency alarm and mobilization during the day and at night addressed occupational hazards for firefighters related to emergency alarm and mobilization during daytime and the nighttime hours. None of the citations provide any substantial evidence that the estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in negative health impacts.

Further, the noise analysis presented in the EIR includes consideration of emergency vehicle noises which would be perceived by nearby noise-sensitive land uses. The analysis includes discussion of the typical noise impacts that increased medical response would generate when sirens are utilized (approximately 100 dBA at 100 feet, and between 91 and 100 dBA at receptors along North Prospect Avenue and Beryl Street). In such a case, associated noise impacts are not considered significant given the infrequent and short duration of siren utilization (duration of exposure to peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic).

*Comment MN59-11*

The comment incorrectly states the EIR does not address concerns related to an increased demand for emergency, police, or fire response. The EIR includes adequate assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local police and fire protection services. As described in Section 3.13.4, *Project Impacts and Mitigation Measures – Fire Protection* under Impact PS-1, implementation of the proposed Project would incrementally increase the demand for the Redondo Beach Fire Department fire protection and Emergency Medical Services (EMS) services as well as other non-emergency services. However, this increase would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, this impact would be less than significant.

As described in Section 3.13.8, *Project Impacts and Mitigation Measures – Law Enforcement* under Impact Description PS-2, following development of the proposed Project, the increase in activity level at the Project site could generate the need for law enforcement services. However, the development under Phase 1 and Phase 2 of proposed Project would include the incorporation of security features such as access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas, and minimum dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of Redondo Beach Municipal Code (RBMC) Section 10-5.1706(c)(10). These measures would be effective in deterring criminal activity at the Project site so any increase in crime would not be substantial.

*Comment MN59-12*

The comment incorrectly claims the EIR omitted recreational analysis and asserts shade and shadow effects of the proposed Project would decrease recreation at Towers Elementary School. the EIR does include consideration of impacts to recreation and recreational amenities in Section 4.0, Other CEQA Considerations. Pursuant to Appendix G of the CEQA Guidelines, impacts of a proposed project on recreational resources are characterized as:

a) A resulting increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and

b) The development of recreational facilities or the construction or expansion of recreational facilities which would result in adverse physical effects on the environment.

As described in Section 4.5, *Effects Found Not to Be Significant*, the proposed Project does not involve the development of recreational facilities and would not substantially increase demand on existing recreational facilities. As a result, the Project would not cause a significant impact on recreation or recreational amenities and additional analysis of the topic is not required. Potential impacts of shade and shadow effects are discussed in Section 3.1, *Aesthetics and Visual Resources* and supported by a shade and shadow model prepared by a licensed architect.

*Comment MN59-13*

The comment incorrectly claims that concerns relating to school drop-off/pickup traffic and general construction and operational traffic under the proposed Project have been unaddressed. Due to requests from the City of Torrance and Torrance Unified School District (TUSD), construction haul routes proposed in the EIR have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to schools. Refer to Master Response 13 – Transportation Analysis for further detail. TUSD also requested during the public comment period that MM NOI-1 be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School, in order to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts. This request will require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1$^{st}$ grade and 5$^{th}$ grade), and are not the same at the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

Construction and operational traffic under the proposed Project is described in Section 3.12, *Transportation* and summarized in Master Response 13 – Transportation Analysis. Implementation of the Construction Traffic and Access Management Plan under MM T-2 would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction

management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible.

Further, implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). After completion of Phase 2, the proposed Project would generate a net increase of 376 new daily trips as compared with existing conditions. While operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the campus (when the majority of cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods, with no measurable increase in cut-through traffic forecasted by the study. Therefore, the proposed Project would not contribute to peak period traffic.

**Letter MN60**

May 6, 2021
Mark Nelson

*Comment MN60-1*

The comment states a previous California Public Records Act request regarding reimbursement agreements related to vaccine services provided by BCHD was not fulfilled and therefore, public participation is being blocked. The comment then asserts need for future funding must be assumed to be reduced and BHCD services should be limited to the three Beach Cities. The comment further asserts BCHD is using funds outside the district and has not demonstrated a need for current or future funding. These comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. As provided in CEQA Guidelines Section 15204, *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."* Refer to Master Response 15 – Purpose of Public Review for further detail and discussion on effective public comment. Further, while

CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to do so if the information *"does not supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about environmental information, is reaffirmed by the courts (Sierra Club v. County of Napa (2004) 121 Cal.App.4th 1490, 1503).

**Letter MN61**

May 6, 2021
Mark Nelson

*Comment MN61-1*

The comment states a previous California Public Records Act request regarding reimbursement agreements related to vaccine services provided by the Beach Cities Health District (BCHD) was not fulfilled and therefore, public participation is being blocked. Refer to the response to Comment MN60-1.

**Letter MN62**

May 8, 2021
Mark Nelson

*Comment MN62-1*

The comment states the Beach Cities Health District (BCHD) board and public review board previously approved a design for a proposed Project that is not represented in the Environmental Impact Report (EIR) and therefore, the EIR is inaccurate. As stated in the opening sentence of Section 1.0, *Introduction*, *"[t]his Environmental Impact Report (EIR) evaluates the potential physical environmental impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project)."* The EIR assessment is limited to describing environmental effects of the proposed Project and is not obligated to assess the environmental impact analysis, mitigation measures, or alternatives of any previous designs.

**Letter MN63**

May 8, 2021
Mark Nelson

*Comment MN63-1*

The comment states a photosimulation provided in the EIR is misleading because it includes nonexistent foliage. The comment also requests diagrams without the foliage be provided. Refer to the response to Comment MN44-1.

**Letter MN64**

May 10, 2021
Mark Nelson

*Comment MN64-1*

The comment provides slides comparing previous design iterations of the proposed Project, particularly noting height increase and parking changes. The comment expresses general concerns related to aesthetic and visual resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining building height and visual character.

**Letter MN65**

May 11, 2021
Mark Nelson

*Comment MN65-1*

The comment states the proposed Residential Care for the Elderly (RCFE) Building is incompatible land use requirements but fails to specify any such requirements. The comment also states the proposed Project is not compatible with and the surrounding character, density, and intensity of adjacent residential land uses. The comment notes the Kensington Assisted Living Facility as a commercial property. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character. Refer also to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

**Letter MN66**

May 12, 2021
Mark Nelson

*Comment MN66-1*

The comment provides the same slides described in Comment MN64-1 which compare previous designs of the proposed Project to the current design. The comment states the project description is inaccurate and unstable but fails to provide specifications or further details regarding how or why the EIR analysis is insufficient in this regard or identify specific concerns. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, conceptual plans for the proposed Healthy Living Campus Master Plans have gone through revisions in response to community feedback. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

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**Letter MN67**

May 12, 2021
Mark Nelson

*Comment MN67-1*

The comment expresses general concerns that the location of the proposed Southern California Edison (SCE) substation would create health and traffic hazards and states the Draft EIR is deficient in its discussion of the substation. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

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**Letter MN68**

May 12, 2021
Mark Nelson

*Comment MN68-1*

The comment requests broad and unspecified information regarding Wood Environment & Infrastructure Solutions, Inc. These comments do not address to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives and does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* Refer to Master Response 15 – Purpose of Public Review.

## Letter MN69

May 14, 2021
Mark Nelson

*Comment MN69-1*

The comments describes a 1,200 signature petition in opposition of the proposed Project and expresses dissatisfaction with redesigns to the proposed Project. This comment along with the referenced petition (refer to Letter BW2) has been noted incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment MN69-2*

The comment expresses general concerns regarding aesthetic and visual impacts due to the height of the proposed Residential Care for the Elderly (RCFE) Building, including blocked views of the Palos Verdes hills and skyline, shade and shadow effects, privacy, and incompatibility with the surrounding neighborhood. The comment compares the height of the proposed Project with previous plan designs and notes Beryl Height Design Guidelines. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding the aesthetic and visual impacts of the Project, including compatibility of the Project design and height with the visual character of the surrounding neighborhood, views of the Palos Verdes Hills, skyline views, shade and shadow effects, privacy concerns, and further discussion on design revisions. As described in Comment MN48-1, the Project site is not located in the Beryl Heights neighborhood nor subject to City of Redondo Beach Residential Design Guidelines.

*Comment MN69-3*

The comment compares the proposed Project's size with other development in the region including the South Bay Galleria and the Staples Center. The states the proposed Project would occupy a greater above-ground square footage than previous designs and would not be compatible with the surrounding neighborhood. The comment asserts that implementation of the proposed Project would cause traffic back-ups along North Prospect Avenue but offers no evidence of this claim. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of revisions to the proposed Healthy Living Campus Master Plan. As described in Section 1.0, *Introduction*, community response to the 2019 Master Plan expressed concern regarding the 2019 project's proposed density. In response, the 2020 and current proposed Project reduced total

occupied building area to 484,900 square feet. This reduction in total building area was achieved through site redesign and reducing the size of the proposed RCFE Building by more than 219,000 square feet. Overall, the proposed Project would reduce total occupied building area would be than that proposed under the 2019 Master Plan. Implementation of the Construction Traffic and Access Management Plan under Mitigation Measure (MM) T-2 would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbook*. Construction management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible. Further, while not required under the California Environmental Quality Act (CEQA) and therefore not discussed in the Environmental Impact Report (EIR), the Non-CEQA Intersection Operational Evaluation included in Appendix J generally found that due to a minor reduction in peak hour trips, the proposed Project would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity. Refer to Master Response 13 – Transportation Analysis for additional discussion regarding the EIR's analysis of transportation impacts and mitigation measures proposed to reduce such impacts.

*Comment MN69-4*

The comment expresses concern that heavy haul trucks routes near schools and associated emissions would adversely impact students. The comment also claims traffic impacts would occur on Beryl Street. It should also be noted that BCHD has revised the proposed haul routes which Torrance Unified School District (TUSD) has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes. The comment also fails to note that the EIR acknowledges that construction-related activities could disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect

Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation. For additional discussion and a detailed response to comments pertaining to construction-related impacts, refer to Master Response 13 – Transportation Analysis.

Further, as described in Section 3.2, *Air Quality* and Section 3.8, *Hazards and Hazardous Materials*, the supporting technical studies and exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would not be significantly impacted by construction-related air emissions or release of hazardous material.

*Comment MN69-5*

The comment expresses concern that heavy-haul trucks near schools would cause disruption to nearby residences and Towers Elementary School. The comment also incorrectly asserts students at Towers Elementary would experience intermittent noise levels of 85 dBA. As provided in Table 3.11-16 and Table 3.11-17 construction-related noise-levels experienced at Towers Elementary School would not exceed Federal Transit Authority (FTA) thresholds It should also be noted that BCHD has revised the proposed haul routes which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for additional a detailed discussion pertaining to the revised construction haul routes. The comment also fails to acknowledge that noise impacts are addressed in detail within Section 3.11, *Noise* and the exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would not be significantly impacted by construction-related vibration.

*Comment MN69-6*

The comment claims the proposed assisted living units and memory care would be beneficial to residents outside of the Beach Cities while impacts would be experienced locally. The comment asserts the proposed facility does not need to be located within the Beach Cities. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care

community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

*Comment MN69-7*

The comment notes BCHD provides services to Beach Cities. The comment asserts following implementation of the proposed Project residents of Torrance would experience impacts related to: construction noise, traffic, emissions, particulate matter, shade and shadow effects, glare, night lighting, sirens and other damages. The comment fails to acknowledge that each of these issues is addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

*Comment MN69-8*

The comment claims noise from construction activities would disrupt the surrounding neighborhood including schools, homes, and businesses. Noise impacts are addressed in detail in Section 3.11, *Noise* and supported by detailed quantitative noise modeling. Temporary, but prolonged construction-related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. However, as described in Impact NOI-1, Towers Elementary School would not experience significant construction-related noise nor impacts (refer to Table 3.11-16 and Table 3.11-17). As described under Impact NOI-3, the operations at the campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC). Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure

substantially contribute to increases in noise pollution that could measurably result in health concerns.

*Comment MN69-9*

The comment notes that the EIR describes outdoor events would be permitted until 10:00 p.m. and suggests noise from such events would disrupt nearby residences. As described in Section 3.11, *Noise* under Impact NOI-3, events held at the Project site would meet the acceptable exterior noise criteria of 50 to 55 dBA consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2. Further, implementation of MM NOI-3b, would require preparation of an Event Management Plan which would establish procedures to limit noise generated by events held on the proposed Healthy Living Campus. Additionally, MM NOI-3c would require the proposed Aquatics Center to close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria, which would further reduce operational noise impacts. As such, noise impacts associated with events held at the Project site would be less than significant.

*Comment MN69-10*

The comment states the proposed assisted living facility is deliberately unaffordable to local residents. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to this issue. The comment also asserts, without substantial evidence or expert opinion, that surrounding neighborhoods have historically experienced noise, traffic, emission and construction-impacts from operation of the existing campus. The comment goes on to assert that BCHD must be funded through tax-free public bonds and operate as non-profit. These comments are not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives and does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.*" Refer to Master Response 15 – Purpose of Public Review. The comment also claim, again without substantial evidence, that nearby residences would suffer environmental injustice under implementation of the proposed Project. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to Master Response 16 – Environmental Justice.

*Comment MN69-11*

The comment claims implementation of the proposed Project would create noise, traffic, emissions, excessive nighttime security lighting, sirens, and other negative impacts and therefore would not qualify for a Conditional Use Permit (CUP). The comment fails to acknowledge that each of these issues is addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF (Community Facility) zoning and land use designation. The comment further states the proposed Project would be incompatible with the surrounding neighborhood due to the size of the proposed Project. Refer to BCHD Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Comment MN69-12*

The comment notes the proposed Project does not involve a public vote and then goes on to describe powers of taxpayers. These comments does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

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**Letter MN70**

May 15, 2021
Mark Nelson

*Comment MN70-1*

The comment states that the relocation of the proposed Residential Care for the Elderly (RCFE) Building to the northern perimeter, as compared to previous project designs, of the Project site maximizes visual impacts. This comment fails to recognize that the bulk and mass of the RCFE Building is focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and forms a step-down in building height to the single- and multi-family residential development along Beryl Street. The comment further asserts, without substantial evidence, that the former South Bay Hospital and current Beach Cities Health Center campus have created environmental and economic justice impacts. Refer to Master Response 16 – Environmental Justice.

*Comment MN70-2*

The comment clarifies that the comments contained within the letter address the project design released June 12, 2020 and approved by the BCHD Board on June 17, 2020. The commenter goes on to expresses their opinion disapproving of the changes contained within the published Healthy Living Campus Master Plan. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. Further, it should be clarified BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. The specific budget for the development of the Healthy Living Campus Master Plan is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment MN70-3*

The comment states, without substantial evidence, that the proposed demolition of the Beach Cities Health Center would create environmental damage. The comment goes on to summarize that BCHD is not currently legally required to provide seismic retrofits. The comment also claims that BCHD provides no professional opinion that the continued use of the Beach Cities Health Center without retrofit would create safety risks. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to concerns regarding seismic safety of the BCHD structures and need for seismic retrofit of facilities.

*Comment MN70-4*

The comment states the proposed Project has not conducted any environmental and economic justice analyses. The Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

*Comment MN70-5*

The comment states asserts, without substantiating calculations, that a 75-foot tall perimeter construction is the equivalent of 300-foot tall construction at the campus center. Analysis of impacts to aesthetic and visual resources is based on multiple visual reconnaissance surveys of the Project site and the surrounding vicinity, which included extensive photography and the development of detailed computer-generated photosimulations by a licensed architect. The

analysis addresses the relationship of the Project site to the surrounding community, and the existing local policy framework for protecting visual resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height.

*Comment MN70-6*

The comment claims that is that Beach Cities Health District (BCHD) is weaponizing economic and environmental injustice by proposing the development of the RCFE Buildings along the northern border of the Project site near young, economically disadvantaged renters with a larger minority fraction than the other Beach Cities that own and fund BCHD. Contrary to the commenter's assertion, the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

*Comment MN70-7*

The comment states the proposed Project parking structure would create environmental damages associated with light, air quality, and noise. The EIR includes adequate analysis under CEQA impacts that physical changes of the proposed Project may have on the surrounding community. These issue are each addressed in great detail in Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, and Section 3.11, *Noise*, with analysis supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis, Master Response 10 – Air Quality Analysis, Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment MN70-8*

The comment states that the current version of the proposed Healthy Living Campus Master Plan removed 160,000 square feet (sf) of underground parking and relocated it to an 800-car parking structure. Refer to Master Comment Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

*Comment MN70-9*

The comment asserts $PM_{2.5}$ pollution form construction and traffic creates a physical alteration in the brainstems of children and causes Alzheimer's Disease and delayed development. The comment provides reference to two studies, neither of which support a conclusion that construction or operational emissions of the proposed Project would result in health impacts. For example, the

study *Cerebrospinal Fluid Biomarkers in Highly Exposed $PM_{2.5}$ Urbanites: The Risk of Alzheimer's and Parkinson's Diseases in Young Mexico City Residents* describes findings that exposure to particulate matter ($PM_{2.5}$) and ozone ($O_3$) above U.S. Environmental Protection Agency (USEPA) standards is associated with Alzheimer's disease risk. The study goes on to describe cerebrospinal fluid biomarkers from a sample population of Mexico City Metropolitan Area children. Similarly, the study T*he emerging risk of exposure to air pollution on cognitive decline and Alzheimer's disease – Evidence from epidemiological and animal studies* describes emerging evidence which suggests exposure to polluted air is associated with impaired cognitive functions at all ages and increased risk of Alzheimer's Disease and other dementias in later life; particularly notable with traffic-related pollutants, noting association with individuals who living in proximity of major roadways. However, neither of these references conflict with or challenge the findings of the quantitative air quality assessment. The comment fails to acknowledge the extensive quantitative modeling provided under Impact AQ-3, which demonstrates that construction and operational criteria air pollutant emissions, would not exceed the South Coast Air Quality Management District's (SCAQMD's) localized significance thresholds (LST), which account for potential human health effects from criteria air pollutants.

*Comment MN70-10*

The comment claims the majority of residents of the proposed assisted living units and memory care units would come from outside 90277 and outside the Beach Cities while all economic an environmental justice impacts will be experienced by 90277 residents. As described in Market Response 5- Affordability of RCFE Assisted Living and Memory Care Units, the market study prepared for the proposed Project identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. It should also be noted, again, that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

*Comment MN70-11*

The comment compares voter approval for the former South Bay Hospital to the lack of voter approval and hospital services of the existing Beach Cities Health Center. The comment states BCHD is not required to be located at its current site. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. However, as described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities were considered. However, the Development on Alternate Site alternative was rejected due to very few sites existing within the Beach Cities that are large enough to accommodate the proposed uses, are not currently occupied by other essential facilities, are currently zoned for uses consistent with those proposed Project, or are not constrained in other ways that would result in a similar or less degree of environmental impact.

*Comment MN70-12*

The comment notes a 1,200 signature petition in opposition to the proposed Project. This comment along with the referenced petition (refer to Letter BW2) has been noted incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment MN70-13*

The comment suggests the organization of BCHD is inept and expresses doubt of the district's ability to provide care to PACE participants and residents of the assisted living and memory care units in relation to COVID-19. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* Refer to Master Response 15 – Purpose of Public Review.

*Comment MN70-14*

The comment provides a link to a Wood's website describing its involvement in oil and gas consulting, engineering, procurement and construction management, etc. Neither the comment nor these articles provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. Again, the comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible*

*impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."* Refer to Master Response 15 – Purpose of Public Review.

**Letter MN71**

May 15, 2021
Mark Nelson

*Comment MN71-1*

The comment states the Environmental Impact Report (EIR) is defective due to its failure to assess intermittent impacts of the proposed heavy haul routes on health, cognition, and learning capability of elementary students. The comment references and summarizes *Does noise affect learning? A short review on noise effects on cognitive performance in children*, an article providing an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies identified therein find acute exposure to noise create negative effects on speech perception and listening comprehension while chronic exposure to aircraft noise negatively affects reading comprehension.

Firstly, is should be noted that the construction haul routes have been revised to avoid hauling in proximity to Towers Elementary School and Magruder Middle School in response to requests from the City of Torrance and the Torrance Unified School District (TUSD) in their public comments. Further, nothing in the cited material references traffic-related noise from construction vehicle trips or suggests the findings are directly applicable to the proposed Project. The quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant.

**Letter MN72**

May 15, 2021
Mark Nelson

*Comment MN72-1*

The comment describes an intention to file a list of unanswered California Public Record Requests. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

**Letter MN73**

May 16, 2021
Mark Nelson

*Comment MN73-1*

The comment states operation of the proposed parking structure would generate increases in intermittent noise and therefore, using average noise levels as a metric for impact analysis is flawed. The comment also states, without substantial evidence or expert opinion, that intermittent noise associated with the proposed parking structure would disturb homeschooling, concentration, sleep, and quiet enjoyment of residential uses.

The comment asserts that Beach Cities Health District (BCHD) has a moral obligation to protect community health and therefore must recognize intermittent noise as a driver of stress, cardiovascular risk, classroom impairment, and general negative health impacts. The comment incorrectly asserts, without substantial evidence or expert opinion, that intermittent noise would impact children at Towers Elementary School and proceeds to claim intermittent noise would have greater impact on students with physical and learning abilities, and second-language learners that tend to be economically and socially disadvantaged. Again, the comment characterizes this as environmental justice issue. Refer to Master Response 12 – Noise Analysis as well as Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to these issues.

The comment provides citations to various studies and literature reviews related to noise, oxidative stress, and negative health impacts, including the aforementioned *Does noise affect learning? A short review on noise effects on cognitive performance in children*, previously discussed in the response to Comment MN71-1. However, beyond discussing the issue of noise, the referenced studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk* discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. *Noise and Quality of Life* describes the role of oxidative stress in noise induced hearing loss which can further cause deterioration in quality of life in that it disrupts sleep, causes cognitive impairment, and has many non-auditory deleterious health effects.

It should be noted that sporadic noises from parking operations are thoroughly addressed in Section 3.11, *Noise*. As described in Section 3.11, Noise, the exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would neither be significantly impacted by construction-related nor operational noise and vibration. Refer to Master

Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to the operational noise analysis.

**Letter MN74**

May 16, 2021
Mark Nelson

*Comment MN74-1*

The comment reiterates general concerns, without substantial evidence, that construction traffic along haul routes would create health hazards and intermittent noise with negative cardiovascular, cognitive, and other community health effects. The comment also asserts truck trips would create vibration impacts. The comment states that average noise is a flawed metric to assess construction-related noise impacts and again attempts claim noise impacts related to construction-trips would create an environmental justice impact. The comment provides citations to the same four studies addressed in the responses to Comment MN73-1.

Firstly, it should be noted that the construction haul routes have been revised to avoid hauling in proximity to Towers Elementary School and Magruder Middle School in response to requests from the City of Torrance and the Torrance Unified School District (TUSD). Refer to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Regarding vibration impacts related to truck trips, the EIR states *"[h]aul truck operations associated with Phase 1 and Phase 2 would not resulting in the doubling of events, would be temporary in nature, and would not exceed the existing vibration by 3 dB or more. Therefore, vibration levels from construction equipment and haul trips associated with BCHD development would not exceed criteria established by the FTA and impacts would be less than significant."*

Regarding noise metrics, it is important to note that the threshold of significance for noise impacts identified in the EIR is based on FTA Transit Noise and Vibration Impact Assessment Manual, which states that an $L_{eq}$ of 80 dBA and a 30-day average of 75 dBA $L_{dn}$ is a reasonable criterion for assessment of construction activities on residential land use. As described in the EIR, this unit of measurement is appropriate because $L_{eq}$ can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,

- Average noise over all phases of the construction.

Given the duration of construction activities associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program, the noise metric $L_{dn}$, averaged over 30-days, was also assessed.

It should also be noted, again, that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

**Letter MN75**

May 16, 2021
Mark Nelson

*Comment MN75-1*

The comment references the State of California Department of Justice's Environmental Justice at the Local and Regional Level Legal Background fact sheet and asserts that the Beach Cities Health District (BCHD) fails to apply these metrics. The EIR clearly addresses potential physical environmental impacts to aesthetics and visual resources, air quality, hydrology and water quality, noise, and the other referenced metrics. However, it should also be noted, again, that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

*Comment MN75-2*

The comment asserts noise and emissions associated with traffic along heavy haul routes would cause adverse health and learning effects to students within the City of Torrance, with particular effects on English as a Second Language students. However, the comment provides no substantial evidence or expert opinion. First, it should be noted the construction haul routes have been revised to avoid hauling in proximity to Towers Elementary School and Magruder Middle School in response to requests from the City of Torrance and the Torrance Unified School District (TUSD) in their public comments. Refer to Master Comment Response 13 – Transportation Analysis. Further, the exhaustive quantitative noise modeling provided in the EIR demonstrates that the addition of haul truck trips generating traffic noise levels of 85 dBA $L_{max}$ at 50 feet, would increase existing daytime traffic noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21) and would not create a significant noise impact. The comment fails to acknowledge impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. The proposed Project would be

consistent with the SCAQMD's 2016 Air Quality Management Plan (AQMP) as discussed under Impact AQ-1. Issues related to impacts to human health are still addressed in detail under Impact AQ-4 and supported by a construction HRA that evaluated individual lifetime cancer risks and non-cancerous chronic hazard index (HIc) associated with DPM emissions during construction activities associated with the Phase 1 preliminary site development plan and the Phase 2 development program and determined impacts would be less than significant with mitigation.

*Comment MN75-3*

The comment makes an unsubstantiated claim the former South Bay Hospital and existing BCHD campus have subjected surrounding neighborhoods to over 60 years of environmental justice impacts. Again, the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

**Letter MN76**

May 17, 2021
Mark Nelson

*Comment MN76-1*

The comment claims that the Beach Cities Health District (BCHD) intentionally proceeded with the proposed Project during the COVID-19 pandemic to avoid timely response to California Public Records Request Act requests. The comment further asserts BCHD must fulfill all outstanding California Public Record Act requests and incorporate them into the Environmental Impact Report (EIR) or delay the closing of the public comment period. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. In light of the COVID-19 pandemic, BCHD, as the lead agency, extended the requisite 45-day public review and comment period to 90 days, from March 10, 2021 through June 10, 2021. As such, adequate public comment period has been provided. In accordance with CEQA Guidelines Section 15088, BCHD, as the lead agency, has reviewed all of the comments received on the Draft EIR for the proposed Project, and provided written responses. As an inclusion of the Final EIR, all of these comments are released with the Final EIR.

**Letter MN77**

May 17, 2021
Mark Nelson

*Comment MN77-1*

The comment claims the EIR disregards short and long-term negative health impacts of the proposed Project and therefore ignores a moral obligation and must be recirculated. The comment provides citations to various studies and literature reviews related to chronic stress, chronic stress in children, and negative health impacts, including cancer development, cardiovascular damage, inflammation, pulmonary disease. However, the comment fails to identify any clear or direct relevance between the referenced studies and the proposed Project or the environmental impact analysis provided in the EIR. None of the cited materials provide any mention of construction activities, noise, or traffic or their potential relationship with stress. For example, the article *Psychological Stress and Cardio Vascular Disease* describes chronic stressors in terms of: job stress, marital unhappiness, the burden of caregiving, and acute stressors in terms of earthquake disasters.

**Letter MN78**

May 17, 2021
Mark Nelson

*Comment MN78-1*

The comment states the Environmental Impact Report (EIR) is flawed for not considering construction and traffic noise impacts relation to atrial fibrillation and provides a citation for a study that study investigated an association between noise annoyance and atrial fibrillation. Annoyance from road traffic, aircraft, railways, industrial/construction and neighborhood noise during daytime and sleep were collected in the study. The study found significant associations between annoyance and atrial fibrillation for aircraft noise annoyance, road traffic annoyances during sleep, and neighborhood annoyances during daytime and sleep, and railway noise annoyance during sleep. However, the study did not identify significant associations between annoyance and atrial fibrillation for temporary construction noise.

**Letter MN79**

May 17, 2021
Mark Nelson

*Comment MN79-1*

The comment provides a citation to a study on the damaging effects of excessive or prolonged stress on childhood development. The comment asserts that the proposed Project would create noise, vibration, traffic, and construction activities leading to the potential for toxic stress, and

therefore must mitigate such effects. However, neither the comment nor the cited study provides a clear relationship between the proposed Project or the environmental impact analysis provided in the EIR. The cited study makes no mention of noise, vibration, traffic, or construction activities as stressors. The EIR includes adequate analysis under California Environmental Quality (CEQA) impacts that physical changes of the Project may have on a community, including Section 3.2, *Air Quality,* Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise,* and Section 3.14, *Transportation*.

**Letter MN80**

May 17, 2021
Mark Nelson

*Comment MN80-1*

The comment states that the Beach Cities Health District (BCHD) has failed to fulfill previous California Public Records Act requests relating to costs by Resident vs. Non-Residents and asserts BCHD must partition benefits by residents versus non-residents as well as benefits to Redondo Beach residents versus benefits to residents of Hermosa Beach and Manhattan Beach. Refer to the response to Comment MN18-1. The comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures. As provided in California Environmental Quality Act (CEQA) Guidelines Section 15204, *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."*

**Letter MN81**

May 17, 2021
Mark Nelson

*Comment MN81-1*

The comment states that the proposed Residential Care for the Elderly (RCFE) Building would be visible from a significant viewshed and provides two attached Google Earth Pro images intended to represent areas where the proposed Project would be visible. Under the California Environmental Quality Act (CEQA), an impact to aesthetic and visual resources in an urban area is not considered significant simply because it is visible from a public location. Rather, an impact

is considered significant if it would substantially degrade the existing visual character or quality of public views of the site and its surroundings. The EIR found, based on detailed technical study including the generation of precise photosimulations, that while the proposed Project would alter the visual character of the Project site and surrounding areas, the proposed development would comply with the Redondo Beach and Torrance General Plans and municipal codes and would not degrade the surrounding visual character. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further discussion on impacts associated with aesthetics and visual resources from the proposed Project.

**Letter MN82**

May 20, 2021
Mark Nelson

*Comment MN82-1*

The comments summarizes placement and design revisions between the 2019 Master Plan and the current proposed Project and incorrectly states the proposed Project increased square feet from the 2019 design. The comment asserts the proposed Project would significantly increase aesthetic and visual, noise, traffic, and emission impacts to younger, renting, higher density area of people of color between Prospect and Flagler and Beryl and 190$^{th}$ and attempts to classify this an environmental justice impact. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan. However, it should be noted that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

**Letter MN83**

May 20, 2021
Mark Nelson

*Comment MN83-1*

The comment states, without substantial evidence or expert opinion, that the California Public Records Act response received for a previous comment regarding the foliage represented in the photosimulations was insufficient. The comment states a photosimulations provided in the Environmental Impact Report (EIR) are misleading because it includes nonexistent foliage. This previously submitted comment regarding foliage is addressed in Comment MN44-1.

**Letter MN84**

May 23, 2021
Mark Nelson

*Comment MN84-1*

The comment claims, without substantial evidence or expert opinion, the proposed Project would cause stress, anxiety, depression, sleep loss and other mental and physical damages to surrounding neighborhoods. The comment provides a citation to an article describing the linkage between mental and cardiovascular health. However, neither the comment nor the citation directly or clearly relates these findings to the proposed Project or supports the claim that implementation of the proposed Project would cause stress, anxiety, depression, sleep loss and other mental and physical damages to surrounding neighborhoods.

**Letter MN85**

May 24, 2021
Mark Nelson

*Comment MN85-1*

The comment critiques revisions from previous designs to the current proposed Project and states, without substantial evidence, that the size and height of the proposed Project would create significant impacts. Refer to Master Response 9 – Aesthetics and Visual Resources for a detailed discussion and response to commenters pertaining to building height and visual character. The comment further asserts the Draft Environmental Impact Report (EIR) is defective because the proposed Project fails to provide perimeter parking and the Bakaly Moral Obligation Standard. However, this comment is not germane to the analysis of physical environmental impacts pursuant to the requirements of the California Environmental Quality Act (CEQA).

**Letter MN86**

May 24, 2021
Mark Nelson

*Comment MN86-1*

This comment again restates the claim that the Beach Cities Health District (BCHD) selectively applies a moral obligation. Refer to the response to Comment MN85-1, this comment is not

germane to the analysis of physical environmental impacts pursuant to the requirements of the California Environmental Quality Act (CEQA).

*Comment MN86-2*

This comment is identical to Comment MN29-1. Refer to the response to Comment MN29-1.

*Comment MN86-3*

This comment is a letter to the Towers and Torrance Parent Teachers Associations and the Torrance Unified School District (TUSD) Board and Superintendent notifying them of the proposed Project.

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**Letter MN87**

May 25, 2021
Mark Nelson

*Comment MN87-1*

The comment expresses support for comments received from Torrance Redondo Against Overdevelopment (TRAO), particularly those relating to the size and design of the proposed Project and incorrectly suggests that the 1,2000 signature petition was ignored.

*Comment MN87-2*

The comment states, without substantial evidence or expert opinion, that the proposed Project is incompatible with surrounding neighborhoods due to its size and elevation difference. The comment expresses concern that the proposed Residential Care for the Elderly (RCFE) Building and parking structure would create blocked views, shade and shadowing effects, and privacy issues. Refer to Master Response 9 – Aesthetics and Visual Resource Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment MN87-3*

The comment notes construction noise would create temporary but prolonged increase identifies temporary, but prolonged, construction-related noise impacts to on- and off-site sensitive receptors. The comment correctly notes that temporary, but prolonged construction-related noise would exceed the identified Federal Transit Authority (FTA) thresholds for the following sensitive receptors:

- West Torrance residents adjacent to Flagler Alley;

- West Torrance residents adjacent to Flagler Lane;
- Redondo Beach residents along Beryl Street to the North; and
- Redondo Beach residents along North Prospect to the North.

Refer to Master Response 12 – Noise Analysis for detailed discussion and a response to comments pertaining to the quantitative noise modeling, assumptions, and results.

*Comment MN87-4*

The comment expresses concern that construction-related traffic under the proposed Project would overwhelm nearby neighborhoods streets, with particular focus on heavy haul truck routes bypassing Towers Elementary School. It should also be noted that Beach Cities Health District (BCHD) has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to the transportation analysis.

*Comment MN87-5*

The comment incorrectly states that construction of the proposed Project would expose nearby receptors, including neighboring residents and schools students, to hazardous materials. The comment summarizes that volatile organic compounds (VOCs) including tetrachloroethylene (PCE) were detected at the Project site. As described in Section 3.8, *Hazards and Hazardous Materials* and summarized in Master Response 11 – Hazards and Hazardous Materials Analysis, neither construction or operational activities associated with the proposed Project would result in the release hazardous materials. For detailed discussion and response to concerns regarding Project impacts on schools and sensitive receptors from construction-related hazards see Master Response 11 – Hazards and Hazardous Materials Analysis. The comment also expresses concerns regarding noise and vibration impacts. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding Project impacts on sensitive receptors from noise.

*Comment MN87-6*

The comment states the proposed Project would be incompatible with P-CF (Community Facilities) zoning and notes six other structures located on a P-CF zoned parcel are not as tall as than the proposed Project. The comment also incorrectly states that under the proposed Project, BCHD would gift public land to private developers. The RBMC does not specify building heights or floor area ratios (FARs) for development standards of P-CF zoned parcels. However, any

proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). The campus is owned by BCHD, a public agency, and designated P (Public or Institutional) land use within the Redondo Beach General Plan. Ownership and land use designation of the Project site would not change under Project implementation. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

*Comment MN87-7*

The comment criticizes BCHD's use of taxpayer funds and financial operations as a public entity and notes residents of the proposed Assisted Living units would not be exclusive to Redondo Beach. The comment further claims that the Redondo Beach Fire Department (RBFD) and paramedics would be excessively taxed by the proposed assisted living units and Program of All-Inclusive Care for the Elderly (PACE) program. The comment also states the former South Bay Hospital was voter approved and exclusively served the Beach Cities.

First, it should be noted that it is highly unlikely that the original South Bay Hospital only served the three Beach Cities. Hospitals (and health districts) generally do not provide benefits to a single zip code or neighborhood and instead provide these benefits to a wider community. Three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach specifically identify that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the campus, referred to in the study as the Primary Market Area. It should also be noted that revenue generated by the uses under Phase 1 – including the proposed Assisted Living program – would support BCHD's broader range of community health programs and services provided to the Beach Cities and the nearby South Bay communities. Refer to Master Response 6 – Financial Feasibility/Assurance. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

The EIR includes adequate assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service rations, response times, or other performance objectives of local fire protection services. As described in Section 3.13, *Public*

*Services* under Impact PS-1, implementation of the proposed Project would incrementally increase the demand for the Redondo Beach Fire Department fire protection and Emergency Medical Services (EMS) as well as other non-emergency services. However, this increase would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, this impact would be less than significant.

*Comment MN87-8*

The comment expresses concerns regarding BCHD acting as the lead agency and certifier of the EIR. Refer to BCHD Master Response 2 – BCHD as Lead Agency for detailed discussion and response to comments pertaining to this issue.

*Comment MN87-9*

The comment critiques BCHD for not utilizing a voter-approved bond for Project funding and expresses concern regarding funding for Phase 2 of the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for detailed discussion and response to comments pertaining to this issue.

*Comment MN87-10*

The comment notes that BCHD is currently not under legal obligation to retrofit the 514 building and suggests retrofitting and remodeling the structure is the responsible choice, presumably over demolition. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to this issue.

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**Letter MN88**

May 25, 2021
Mark Nelson

*Comment MN88-1*

The comment claims that the Beach Cities Health District (BCHD) is at fault for failure to fulfill California Public Records Act requests and has prevented intelligent participation. See response to Comment MN18-1. The comment is not germane to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures. In light of the COVID-19 pandemic, BCHD, as the lead agency, extended the requisite 45-day public review and comment period to 90 days, from March 10, 2021 through June 10, 2021. As such, adequate

public comment period has been provided. In accordance with CEQA Guidelines Section 15088, BCHD, as the lead agency, has reviewed all of the comments received on the Draft EIR for the proposed Project, and provided written responses. As an inclusion of the Final EIR, all of these comments are released with the Final EIR.

**Letter MN89**

May 27, 2021
Mark Nelson

*Comment MN89-1*

The comment correctly identifies Redondo Beach as a permitting authority for the required Conditional Use Permit (CUP) but states this fact discredits Table 3.1-1 which summarizes the heights of the tallest buildings in the Beach Cities and Torrance. The comment claims the only relevant heights are the 30-foot structures in proximity of the Project site. The comment states the proposed Project would be inconsistent with surrounding development and relevant zoning. The comment further states commercial use that would serve non-residents of Redondo Beach ca not be permitted. These issues are addressed in the response to Comment MN50-1.

**Letter MN90**

May 27, 2021
Mark Nelson

*Comment MN90-1*

The comment states BCHD has not fulfilled outstanding California Public Records Act requests and therefore has prevented intelligent public participation. The comment is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. Refer to Comment Response MN18-1 and Master Response 15 – Purpose of Public Review.

**Letter MN91**

*Comment MN91-1*

The claims that outdoor nighttime lighting has peer-reviewed negative impacts of surrounding residents. The comment provides a photo of the streetlights and traffic lights at the intersection of North Prospect Avenue with the main entrance to the Project site, as well as security lighting within the Beach Cities Health District (BCHD) campus parking lots at nighttime, facing east from the west side of North Prospect Avenue. The comment then cites a study by Maurice M. Ohayon, MD, DSc, PhD and Cristina Milesi, PhD titled *Artificial Outdoor Nighttime Lights Associate with*

*Altered Sleep Behavior in the American General Population*, which is available here: https://www.ncbi.nlm.nih.gov/ pmc/articles/PMC4863221/. The EIR thoroughly details the existing sources of nighttime lighting at and in the vicinity of the Project site in Section 3.1, *Aesthetics and Visual Resources*. As described therein, existing uses in the immediate vicinity of the Project site contribute to nighttime lighting that is characteristic of suburban environment, including interior building illumination, streetlights, exterior security lighting, and vehicle lights. Adjacent commercial and residential buildings include both indoor and outdoor illumination of façades, along with indoor illumination of windows, balconies, and exterior lighting fixtures. Outdoor lighting sources include exterior light fixtures, which range from small fixtures from nearby residences to illuminated signs for the Vons and Shell gas station north of the site. Streetlights illuminate the sidewalks along both sides of North Prospect Avenue, the south side of Beryl Street, the east side of Flagler Lane, and the raised center media on Diamond Street.

Sources of nighttime light on the Project site include the security lighting on-site located around the perimeter of the north and west surface parking lots as well as the above ground parking structure at 512 North Prospect Avenue. Direct light from vehicle headlights within the surface parking lots located on the Project site also create light sources at the Project site and surrounding uses. However, due to the Beach Cities Health Center's hours of operation (i.e., 9:00 a.m. to 5:00 p.m.) nighttime lighting from vehicles is limited at the Project site.

The potential Project operational impacts on nighttime lighting are discussed under Impact VIS-3 in Section 3.1, *Aesthetics and Visual Resources*. Given that construction activities at the BCHD campus would occur between the hours of 7:30 a.m. and 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday, exterior construction lighting would generally not be required. If necessary, during the winter when the sun sets earlier or if otherwise necessary for security purposes, lighting would be shielded and directed into the interior of the Project site. Security fencing and the noise barriers required under Mitigation Measure (MM) NOI-1 would screen light sources from view of nearby sensitive receptors (e.g., neighboring single- and multi-family residences) and other passersby. Thus, temporary lighting associated with construction activities would not adversely affect daytime or nighttime views in the area.

The proposed Project would increase lighting associated with interior building illumination and outdoor lighting for nighttime security and wayfinding around and through the campus. Interior lighting would be designed with occupancy sensors and dimmers, where feasible and appropriate. Additionally, during the evening hours, interior lighting associated with the Assisted Living units and Memory Care units would be muted as a result of interior blinds, curtains, and other shades. Outdoor ground floor illumination would be limited to the entry plaza, outdoor seating areas, and

pedestrian pathways. Lighting in these areas would be low lying and directed toward the ground. As such, outdoor ground lighting would generally be contained within interior spaces of the Project site. Exterior outdoor lighting would also be further muted by proposed landscaping along the perimeters of the Project site.

The comment also states that BCHD must conduct cost-benefit analyses as well as investigate economic injustice and property value impacts for the last 60 years. Refer to Master Response 3 – Project Need and Benefits. Consistent with the requirements of the California Environmental Quality Act (CEQA), this EIR is an informational document that assesses the potential physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. CEQA does not require an exhaustive quantification of the value that BCHD provides to the community within the EIR. Nevertheless, a quantitative analysis of BCHD's services can be found in the Community Health Report (https://www.bchd.org/healthreport) as well as the Priority-Based Annual Budgets (https://www.bchd.org/operating-budgets).

The comment goes on to assert that BCHD has no data to demonstrated local benefits compared to negative Environment Justice impacts. It should be noted that according to Office of Environmental Health Hazard Assessment (OEHHA) CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. This ranking is based on specific categories such as pollutant exposure, environmental effects, sensitive populations, and socioeconomic factors. While not specially a CEQA issue, the claim that BCHD operations have resulted in a disproportionate impact on an Environmental Justice community is unfounded.

**Letter MN92**

May 27, 2021
Mark Nelson

*Comment MN92-1*

The comment provides a graphic intended to indicate that south Redondo Beach would experience all economic and environmental justice impacts while only 5 percent of residents of the assisted living units would be from Redondo Beach. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living

program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. Claims of environmental justice impacts are not applicable to the Project site, see Master Response 16- Environmental Justice for further details and discussion.

**Letter MN93**

May 28, 2021
Mark Nelson

*Comment MN93-1*

The comment provides citations to various studies and literature reviews related to traffic, noise, sirens, traffic-related air pollution, chronic stress, and negative health impacts. However, beyond discussing the issue of traffic, noise, and air pollution, neither the comment, nor any of the referenced studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. Refer to responses to Comment FL1-68 through Comment FL1-72, which provide the same links to various studies and literature reviews.

**Letter MN94**

May 29, 2021
Mark Nelson

*Comment MN94-1*

The comment claims that the use of the $L_{eq}$ metric is inappropriate for evaluating noise. The comment goes on to claim that haul trucks, which typically generate traffic noise levels of 85 dBA $L_{max}$ at 50 feet, would create a distraction to students. Refer to Comment Response FL-63 and Master Response 12 – Noise Analysis for a detailed discussion regarding the use of the $L_{eq}$ metric in the analysis of construction-related noise impacts presented in 3.11, *Noise*.

**Letter MN95**

June 1, 2021
Mark Nelson

*Comment MN95-1*

The comment asserts that existing outdoor lighting at the Beach Cities Health District (BCHD) campus is in violation of the American Medical Association Guidelines. However, the comment fails to cite the specific guideline the comment is referring to and how BCHD is in violation. Further, the provided citation does not provide a clear connection between the environmental issue raised in the comment and the purported negative health impacts.

The comment goes on to claim that no health analysis of the negative impacts of lighting is presented in the Environmental Impact Report (EIR). The EIR thoroughly discloses and addresses the potential for impacts related to construction and operational lighting in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 and Impact VIS-3. As described therein, outdoor lighting would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with Redondo Beach Municipal Code (RBMC) Section 92.30.5 and these design guidelines. It should also be noted that the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. During this review, the proposed lighting as well as the other reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare consistent with the requirements of the RBMC.

**Letter MN96**

June 1, 2021
Mark Nelson

*Comment MN96-1*

The comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Under the proposed Project the proposed Assisted Living program and Memory Care community would continue to be operated in accordance with Federal, State, and local health guidelines in effect at the time. It should be noted that this continues to be the case for the Beach Cities Silverado Memory Care Community on the existing Beach Cities Health District (BCHD) campus.

**Letter MN97**

June 1, 2021
Mark Nelson

*Comment MN97-1*

The comment states the Environmental Impact Report (EIR) is defective and must be recirculated because it fails to identify the proposed Project is inconsistent with C-2 (Commercial) zoning. Refer to the response to Comment Letter WB regarding the revisions to the building footprint and floor area ratio (FAR). This minor revision does not meet any of the triggers for recirculation described under California Environmental Quality Act (CEQA) Guidelines 15088.5.

**Letter MN98**

June 1, 2021
Mark Nelson

*Comment MN98-1*

The comment states the proposed Project fails to meet a guiding principle to include perimeter parking. The comment includes a graphic of the referenced of the referenced guiding principles as provided during Community Working Group (CWG) meetings. It is important to note that the comment addresses early conceptual planning efforts and does not address the project objectives referenced as presented in Section 2.4, *Project Objectives*. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

**Letter MN99**

June 2, 2021
Mark Nelson

*Comment MN99-1*

The comment states that Beach Cities Health District (BCHD) has failed to fulfill over 80 California Public Records Act requests and by such, has prevented intelligent public participation. Refer to the response to Comment MN18-1. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

**Letter MN100**

June 4, 2021
Mark Nelson

*Comment MN100-1*

The comment provides a citation to an article that describes the production of concrete as a major emitter of carbon dioxide. The article identifies cement made from limestone as a central ingredient of concrete. The article describes *"[w]hen heated, the calcium carbonate in limestone breaks into calcium oxide and carbon dioxide, which is released into the air. The calcium oxide is ground with limestone and gypsum to make cement."* The comment then incorrectly asserts the Draft Environmental Impact Report's (EIR's) analysis of greenhouse gas (GHG) impacts is defective because the analysis does not account for concrete construction.

As clearly acknowledged in Section 3.7.1, *Environmental Setting*, *"[t]he natural production and absorption of $CO_2$ occurs through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, trees and wood products, and as a result of other chemical reactions, such as those required to manufacture cement."*

GHG emissions associated with the construction and operation of the proposed Project were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 and standard methodologies for modeling such emissions. CalEEMod was developed in collaboration with the air districts of California and is recommended by South Coast Air Quality Management District (SCAQMD). Regional data (e.g., emission factors, meteorology, source inventory, etc.) have been provided by the various California air districts and Southern California Association of Governments (SCAG) to account for local requirements and conditions. The model quantifies direct emissions from construction and operations – including vehicle use – as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. As such, the EIR provides adequate and sufficient analysis of GHG emissions associated with the proposed Project.

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**Letter MN101**

June 4, 2021
Mark Nelson

*Comment MN101-1*

The comment claims that analysis of representative views is insufficient. Please see Comment Response MN15-1 for discussion of the sufficiency of representative views analyzed in Section 3.1, *Aesthetics and Visual Resources*. To fully and accurately assess impacts associated with proposed development, the Environmental Impact Report (EIR) includes an assessment of computer-generated photosimulations independently prepared for the EIR by VIZf/x, licensed

architects and visual simulation specialists, for the Phase 1 preliminary site development plan. The EIR also includes representative views, prepared by Paul Murdoch Architects, in coordination with the CEQA Project Management Team, of possible development under the Phase 2 development program (i.e., Community Health and Wellness Center, a parking structure, an Aquatics Center, a Center for Health and Fitness [CHF], a medical office building) from public areas immediately adjacent to the Project site including North Prospect Avenue, North Prospect Avenue and Diamond Street, Flagler Lane and Tower Street. These photosimulations and representative views were reviewed in the context of the development standards under the Redondo Beach and Torrance General Plans and municipal codes. To evaluate potential changes to visual resources, a total of six representative views were identified with input from the City of Redondo Beach. Views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity.

These six representative views encircle the campus and provide west, southwest, south, and northeast facing views of the Project site. As described, these views were identified with input from the City of Redondo Beach and offer a range of public views from different areas of the surrounding neighborhoods and include views of various elements of the proposed Project, such as the proposed Residential Care for the Elderly (RCFE) building, ornamental landscaping, and the steep grade and retaining wall located on the Project site's eastern border.

For example, representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represents views of the Project site from the residential neighborhood within Torrance adjacent to the east of the Project site. Likewise, representative view 2 was selected because it represents the view of the steep grade, retaining walls, and landscaped vegetation along the eastern border of the Project site, which is visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street.

As such, the representative views and subsequent analysis included in the EIR are provide a sufficient depiction and assessment of how public views would be affected by proposed development. Refer to BCHD Master Response 9 – Aesthetics and Visual Resources for a detailed discussion and response to comments pertaining to this issue.

*Comment MN101-2*

The comment suggests that Project development would adversely affect property values of nearby homes. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, CEQA requires and EIR analysis *"identify and focus on the significant environmental effects of a proposed project"* (CEQA Guidelines 15126.2[a] and Public Resources Code Section 21000[a]).

CEQA Guidelines Section 15382 defines *"significant effect on the environment"* as *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment."* Accordingly, the EIR analyzes the potential *"physical"* adverse effects of a proposed Project. Property value loss in and of itself is not a physical impact required to be included in a CEQA analysis. The EIR includes adequate analysis under CEQA for community services and population and housing, including Section 3.12, *Population and Housing*, Section 3.13, *Public Services*, Section 3.15, *Utilities and Service Systems*, and Section 4.0, *Other CEQA Considerations*, as well as the impacts that physical changes of the Project may have on a community, including Section 3.1, *Aesthetics and Visual Resources,* Section 3.2, *Air Quality,* Section 3.8, *Hazards and Hazardous Materials*, Section 3.10, *Land Use and Planning,* Section 3.11, *Noise,* and Section 3.14, *Transportation*.

*Comment MN101-3*

The comment suggests that the Beach Cities Health District (BCHD) is not qualified to act as the lead agency for the proposed Project. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

*Comment MN101-4*

The comment implies that the EIR does not follow local standards and therefore does not meet CEQA requirements; however, it is not clear what standards are being referenced. The EIR includes consistency analysis of all applicable local policies and regulations. Each section of the EIR includes a regulatory setting that identifies local policies and regulations. The subsequent analysis includes proposed Project consistency with these local polices including the Redondo Beach General Plan, Torrance General Plan, Redondo Beach Design Guidelines Redondo Beach Municipal Code, and Torrance Municipal Code. While not required, the Aesthetics and Visual Resources section also analyzed consistency with the *City of Los Angeles CEQA Thresholds Guide (2006)* after public scoping efforts found there was general concern regarding shade and shadow impacts that might occur under the proposed Project. CEQA Guidelines do not require analysis of shade and shadow impacts or provide thresholds to measure such impacts. Neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. However, the EIR provides analysis of shade and shadow impacts based on thresholds set forth in the *City of Los Angeles CEQA Thresholds Guide (2006)*.

**Letter MN102**

June 5, 2021
Mark Nelson

*Comment MN102-1*

The comment incorrectly claims that the EIR does not include analysis of the health impacts associated with a variety of potential Project impacts and other topics, such as criteria pollutant and toxic air contaminant (TAC) emissions, light and glare, contaminated water, noise, and traffic safety. This comment fails to acknowledge the technical studies, including exhaustive modeling and sampling efforts provided the EIR. The comment does not challenge any specific aspects of the analyses provided in the EIR or provide any substantiating evidence to further support its assertions.

**Letter MN103**

June 5, 2021
Mark Nelson

*Comment MN103-1*

The comment references peer-reviewed research submitted in previous comments and states the Environmental Impact Report (EIR) is defective for failure to analyze impacts mental and physical health impacts that would occur under the proposed Project. The comment further asserts that the EIR includes no discussion of cardiovascular, pulmonary, mental health, particulate matter, and other health effects. However, as described in these comment responses, these claims are unsubstantiated and unfounded. The comment further cites the Sierra Club v. County of Fresno (2018) 6 Cal.5th 502 and the court's conclusions regarding the EIR's air quality analysis. The EIR was prepared pursuant to the CEQA Guidelines and includes thorough, detailed analysis of the potential impacts on various resources, including impacts on air quality and the associated potential effects of the proposed Project on human health. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

*Comment MN103-2*

The comment asserts the proposed Project would have negative impacts related to nighttime lighting, release of particulate matter emissions, and noise. These issues area addressed in Section 3.1, *Aesthetics and Visual Resources,* Section 3.2, *Air Quality,* and Section 3.11, *Noise*. The comment again references concerns brought up in previous comments. These comments have been reviewed and responded to and included in the Final EIR.

*Comment MN103-3*

The comment states the EIR must be remediated and recirculated and again references the court case Sierra Club v. County of Fresno (2018) 6 Cal.5th 502. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

**Letter MN104**

June 5, 2021
Mark Nelson

*Comment MN104-1*

The comment includes a California Public Records Act Request to Beach Cities Health District (BCHD) regarding studies correlating between health damages/environmental impacts and potential impacts of the proposed Project. This comment is not germane to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. The EIR thoroughly discloses and addresses the potential health and environmental impacts associated with construction-related air emissions, shade/shadow, light and glare, noise, and hazardous materials and wastes on-site as well as other potential Project impacts. Refer to the response to Comment MN102-1.

**Letter MN105**

June 6, 2021
Mark Nelson

*Comment MN105-1*

The comment claims, without substantial evidence, that the traffic analysis in the Environmental Impact Report (EIR) is defective and fails to meet the City of Redondo's request. However, contrary to this assertion, the scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and vehicle miles traveled (VMT) analysis. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to this issue.

## Letter MN106

June 6, 2021
Mark Nelson

*Comment MN106-1*

The comment contests a statement provided on the Beach Cities Health District (BCHD) website, claiming that BCHD has not harmed the surrounding community for 60 years. This comment is does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment proceeds to identify the comments contained in MN106-2 through MN106-20 as concerning BCHD's moral obligation to protect the surrounding community and expresses desire that they be recorded in the EIR. These comments have been noted and incorporated into the Final EIR as a part of the responses to comment.

*Comment MN106-2*

The comment claims for over 60 years, construction and operational activities of the existing BCHD and former South Bay Hospital damaged surrounding neighborhoods through *"excavation and hauling; construction traffic, worker commuting, and heavy trucking; 510 and 520 medical office building construction; room additions to the 514 building; excess traffic and related safety hazards; excess tailpipe exhaust, including carbon monoxide, nitrogen oxides, ozone, tetraethyl lead, and long chain hydrocarbons; excess $PM_{2.5}$ and $PM_{10}$ particulates; excess site noise; excess emergency vehicle traffic with lights and sirens; excess outdoor nighttime lighting from signage and parking lots lights; daytime shadows; restricted sunlight; reflections; localized heat islanding; neighborhood privacy invasion; neighborhood chronic stress (Bluezones "silent killer"); environmental injustice; economic injustice; reduced housing prices; negative externalities; and a host of other negative impacts."* This comment makes no reference to activities associated with the proposed Project and does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Further, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

*Comment MN106-3*

The comment claims the BCHD Chief Executive Officer (CEO) was directed include public comments received on the Draft EIR into the Final EIR. All public comments were posted after

the close of the public comment period. Consistent with CEQA Guidelines Section 15088 of the State, all of the comments received on the Draft EIR, including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on March 24, 2021, April 13, 2021, and April 17, 2021, were reviewed and responded to, as appropriate.

*Comment MN106-4*

The comment summarizes a statement communicated between BCHD and the Redondo Beach City Attorney regarding the benefit of the proposed Project. Refer to the response to Comment MN23-2.

*Comment MN106-5*

The comment incorrectly states the former South Bay Hospital and existing Beach Cities Health District campus have caused environmental and economic justice impacts to surrounding neighborhoods, including the Beryl Heights Neighborhood and Towers Elementary School, for over 60 years. Refer to the response to Comment MN106-2. Again, it should be noted that the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

The comment goes on to state that the existing BCHD campus has historically, and the proposed Project would create excess traffic-induced safety hazards. However, the comment does not specify any such hazard and fails to acknowledge that traffic safety hazards are already addressed in EIR. Section 3.14, *Transportation* under Impact T-3 describes impacts on traffic and roadway and pedestrian safety. Implementation of Mitigation Measure (MM) T-2 would require the preparation of Construction a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety avoid construction-related safety. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues. The comment provides citations to various studies and articles related to traffic and pedestrian safety and nocturnal road traffic noise. However, beyond discussion the issue of traffic, neither the comment, nor any of the referenced material provide a clear relationship to the proposed Project or the environmental analysis provided in the EIR. For example, the study *Road Traffic Safety: An analysis of the cross-effects of economic road and population factors* describes data collected on traffic accidents in 31 provinces and cities in China from 2004 to 2016 and concludes the increase of gross domestic product and traffic investment can significantly reduce the number of road traffic

casualties in China. This study was also cited in Comment FL2-12. The remaining studies regarding pedestrian safety largely provide quantitative analysis of demographics of pedestrian injury and mortality rates. None of the referenced studies or articles conflict with the EIR's analysis or suggest an element of the proposed Project has not been sufficiently reviewed. Regarding nocturnal traffic noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would constitute a less than significant impact.

*Comment MN106-6*

The comment provides citations to various studies and articles related to vehicular emissions or more general air pollution. These articles go on to describe the relation between pollutants and negative health effects related to cardiovascular health, child development, cancers and respiratory disease. However, none of the referenced studies or literature reviews conflict with the analysis. As described in Master Response 10 – Air Quality Analysis, an exhaustive air quality modeling effort was conducted to evaluate construction and operational air emissions associated with the proposed Project. Construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts, including mobile source emissions associated with vehicle trips to and from the Project site, are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District's (SCAQMD's) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD mass daily significance thresholds for operation. which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

*Comment MN106-7*

The comment provides citations to various studies and articles related to noise pollution and public health, emergency alarms and stress, and traffic noise. Additionally, *Experimental Chronic Noise Is Related to Elevated Fecal Corticosteroid Metabolites in Lekking Male Greater Sage-Grouse (Centrocercus urophasianus)* and *Effects of traffic noise exposure on corticosterone, glutathione and tonic immobility in chicks of a precocial bird describes how noise can affect the habitat patterns and stress response of two bird species (greater sage-grouse and Japanese quail [Coturnix japonica] respectively)*.

However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* including the detailed quantitative noise modeling effort. Further, regarding nocturnal traffic noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would constitute a less than significant impact.

*Comment MN106-8*

The comment provides citations to various studies related to glare or the reflectivity of buildings. Neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of Project impacts with nighttime lighting and glare issues in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to glare issues. Neither the comment nor the citations provide any detail that would suggest the EIR analysis is insufficient.

*Comment MN106-9*

The comment provides citations to various articles and literature reviews regarding health benefits of sunlight and natural lighting with one article (*Place value: place quality and its impact on health, social, economic and environmental outcomes*) describing the more general link between place quality and link to health, social, economic, and environment effects. Neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of Project impacts to shade and shadow effects in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues. Neither the comment nor the citations provide any clear detail that would suggest the EIR analysis is insufficient.

*Comment MN106-10*

The comment provides citations to various studies and articles related to nighttime lighting. The cited studies address a range of topics including nighttime or artificial lighting's relationship to bats, circadian rhythm, teen sleep and mood, light pollution, and attraction of disease-carrying pests. However, neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of potential impacts associated with nighttime lighting and glare issues in Section 3.1,

*Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and a response to comments pertaining to glare issues.

*Comment MN106-11*

The comment provides citations to various studies and articles related to noise, sleep, and health. However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* which is supported by an exhaustive quantitative noise modeling effort. Further, regarding nocturnal traffic noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would constitute a less than significant impact.

*Comment MN106-12*

The comment provides citations to two news articles related to rising crime rates among homeless populations of Los Angeles, one of which was specific to the year 2018, and a guide on homeless encampments provided by Arizona State University. There is no clear connection between the materials cited and the proposed Project. None of the material provides any mention of Redondo Beach, Torrance, construction activities, redevelopment, or operation of a similar campus-type facilities.

*Comment MN106-13*

The comment provides citations to various studies and referential material related to fugitive dust, particulate matter (PM), and adverse respiratory health effects. However, the findings of these reviews do not conflict with or challenge any specific aspects of the analysis provided in Section 3.2, *Air Quality*. As described therein, impacts associated with temporary, but prolonged construction-related impacts are addressed under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction health risk assessment (HRA).

*Comment MN106-14*

The comment provides citations to various studies and articles related to noise, sleep disturbance, traffic noise and health including *Environmental noise and sleep disturbances: a threat to health, A Multilevel Analysis of Perceived Noise Pollution, Auditory and non-auditory effects of noise on health, Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality* included in Comment MN106-11 and *Environmental Stressors: The Mental Health Impacts of Living Near Industrial Activity* included in Comment MN106-19. Refer to these individual response to these comments for a detailed discussion and response to comments.

*Comment MN106-15*

The comment includes citations to articles and studies related to asbestos-containing material (ACM). However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.8, *Hazards and Hazardous Materials*. For example, *Asbestos Exposure among Construction Workers During Demolition of Old Houses in Tehran, Iran* evaluates asbestos exposure specifically among construction workers in Tehran, Iran. This article is also cited in Comment FL2-22. The article *Can Buildings Be Demolished Safely Without Asbestos Abatement* explores the possibility that structures in Detroit, Michigan may be able to be safely demolished without the additional cost of asbestos abatement. This article is also cited in Comment FL2-22. The comment also cites the U.S. Environmental Protection Agency's (USEPA's) *Scope of Risk Evaluation for Asbestos and Guidelines for Enhanced Management of Asbestos in Water at Ordered Demolition* but makes no indication that the proposed activities or mitigation measures is insufficient with referenced standards. *Estimating the Additional Greenhouse Gas Emissions in Korea: Focused on Demolition of Asbestos Containing Materials in Building* describes greenhouse gas (GHG) emissions occur during removal of ACM due to operation of construction equipment and truck trips. However, construction GHG emissions modeling described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, already describes GHG emissions associated with planned construction activities, including those that would occur with building demolition and asbestos abatement.

As described in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-1, prior to demolition of existing structures with the potential to contain hazardous materials surveys would be conducted by a licensed contractor(s). If hazardous material is found, all applicable Federal, State, and local codes and regulations and best management practices related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds would be followed to ensure public safety, such as sealing off an area and filtering effected air. Adherence to these regulations and best management practices (BMPs) would ensure that impacts associated with the proposed Project

would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment MN106-16*

The comment provides citations to various studies related to hazardous material and stormwater drainage. However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.8, *Hazards and Hazardous Materials* or Section 3.9, *Hydrology and Water Quality*. For example, *Storm water contamination and its effect on the quality of urban surface waters* describe stormwater drainage and surface water pollutants within the sewage system of a city in Poland. The aim of the analyses was to explain to what extent pollutants found in storm water runoff from the studied catchments affected the quality of surface waters and whether it threatened the aquatic organisms. This study was also cited in Comment FL2-24.

The comment also fails to acknowledge that the EIR includes analysis of stormwater runoff in Section 3.9, *Hydrology and Water Quality* and potential hazards and hazardous materials in Section 3.8, *Hazards and Hazardous Materials*. As described therein and summarized in Master Response 11 – Hazards and Hazardous Materials Analysis, the prepared Phase I Environmental Site Assessment (ESA) identified potential sources of contamination. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of these ESAs, the EIR describes compliance with applicable regulations and standards, BMPs, and required mitigation measures to address these conditions and ensure that impacts associated with the proposed Project would be less than significant. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment MN106-17*

The comment provides citations for two articles with no clear connection to the proposed Project or the EIR analysis. *Designing for invisible injuries: An exploration of healing environments for posttraumatic stress* describes architecture and design strategies for creating empathetic spaces for veterans with post-traumatic stress disorder. *Trauma Informed Community Building* describes a Trauma Informed Community Building approach in community development. The comment includes the clause *"reduced visual privacy"* but this issues is not elaborated on further in the article.

*Comment MN106-18*

The comment also provides citations to various studies related to health effects of traffic noise, nighttime noise, and general noise exposure, including cardiovascular responses in young adults. However, beyond discussing the issue of noise, the referenced studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk* discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. The comment fails to acknowledge that noise impacts are addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. This study is also reference in Comment FL1-69, Comment FL2-9, Comment FL2-26, and Comment MN73-1.

*Comment MN106-19*

The comment provides citations to various studies and literature reviews related to stress management/avoidance strategies, traffic noise, traffic-related air pollution and stress. However, beyond discussing the issues of traffic, noise, and air quality neither the comment, nor any of these studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR.

For example, *Traffic-Related Air Pollution and Stress: Effects on Asthma* provides very specific clarifications on another study *Chronic Traffic-Related Air Pollution and Stress Interact to Predict Biologic and Clinical Outcomes in Asthma*. This latter study determined that physical and social environments interacted in predicting, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress. Importantly, this study did not measure any increases in stress in children as a result of traffic. Additionally, the study acknowledges limitations including small sample size, varying time frame for measures, and pollution estimates using land using models that are best suited for long-term exposure. This study is also reference in Comment FL1-70 and Comment FL2-10.

As Master Response 14 – Transportation Analysis, the EIR provided a detailed trip generation analysis and an exhaustive quantitative modeling effort. Implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). This is in part because Phase 1 of the proposed Project would replace high trip generating land uses (e.g., medical office) with lower trip generating land uses (e.g., Assisted Living units). This reduction in daily vehicle trips as a result of Phase 1 is also attributed to the demolition of most of the existing

uses within the Beach Cities Health Center and the construction of only a small portion of the proposed Healthy Living Campus Master Plan. After completion of Phase 2, however, the proposed Project is expected to generate a total of 3,360 daily vehicle trips, including 271 AM peak period trips and 195 PM peak period trips (refer to Table 3.14-7). After accounting for existing trips being removed from the roadway network, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate a net increase of 376 new daily trips as compared with existing conditions.

None of the referenced studies suggest that this level of operational traffic would result in traffic-related stress, noise, or air quality impacts. With regard to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. With regard to transportation-related air quality impacts, the quantitative analysis demonstrates that criteria air pollutant emissions and TACs would be less than SCAQMD's thresholds.

*Comment MN106-20*

The comment reiterates previous claims that the existing campus and the former South Bay Hospital have damaged the surrounding environment and inaccurately claims these facilities created economic and environmental justice impacts. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

The comment states BCHD was never voter approved. The comment states that if the issues described in Comment MN106-2 through MN106-19 are not addressed, or the proposed Project's request for a Conditional Use Permit (CUP) must be rejected and a public vote enacted. However, the legal requirement for this suggested public vote is unfounded.

**Letter MN107**

June 8, 2021
Mark Nelson

*Comment MN107-1*

The comment summarizes a California Supreme Court ruling that describes an Environmental Impact Report (EIR) must provide sufficient detail to enable readers to understand and to consider meaningfully the issues that the proposed Project raises, and make a reasonable effort to substantially connect the proposed Project's significant air quality impacts to likely health

consequences. The comment further states the EIR has failed to substantially connect the impacts under the proposed Project, particularly air quality impacts, to health consequences. Contrary to this commenter's assertion, air quality impacts and health consequences are clearly described in the EIR and supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

*Comment MN107-2*

The comment notes that the Beach Cities Health District (BCHD) is a California Health District and recognizes its goals to enhance community health and eliminate the existing seismic risk. The comment claims, without substantial evidence, that BCHD has failed to evaluate cost-effectiveness of provided services and programs. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to BCHD Master Response 6 – Financial Feasibility/Assurance.

*Comment MN107-3*

The comment claims the EIR is defective due to failure to examine environmental and health damages associated with the proposed Project but fails to specify details what these damages the EIR has not sufficiently assessed. The comment contests BCHD's role as a lead agency and validity of benefits under the proposed Project. The EIR was prepared pursuant to the CEQA Guidelines and includes thorough, detailed analysis of Project impacts on various resources, including impacts on air quality, noise, land use compatibility, and hazards and hazardous materials, which takes into consideration and assesses the Project's potential effects on human health with regard to each of these resources. Refer to Master Response 2 – BCHD as Lead Agency for detailed discussion and a response to comments pertaining to BCHD's role as the Lead Agency.

*Comment MN107-4*

The comment states it is incumbent on the City of Redondo Beach, City of Torrance, Redondo Beach Unified School District, and Torrance Unified School District to provide comments to BCHD and ensure compliance with California Supreme Court ruling which held that an EIR must (1) include sufficient detail to enable readers to understand and to consider meaningfully the issues that the proposed project raises; and, (2) make a reasonable effort to substantively connect the Project's significant air quality impacts to likely health consequences. The comment again asserts, without substantial evidence, that the EIR has failed to sufficiently analyze health impacts associated with the proposed Project. Contrary to this commenter's assertion, air quality impacts

and health consequences are clearly described in the EIR and supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

*Comment MN107-5*

The comment claims that the reduction of sky views and sunlight, and shade and shadow impacts correlate to physical and mental health impacts. The comment fails to provide any further detail or evidence clearly describing how the proposed Project would contribute to such health effects. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining potential impacts to aesthetics and visual resources.

*Comment MN107-6*

The comment claims significant intermittent noise correlate to physical and mental health effects, American Disability Act and 504 plan violations, but fails to provide any evidence to support these claims or describe how such effects would relate to the proposed Project. Refer to Master Response 12 – Noise Analysis for additional detail regarding the noise analysis, which is supported by an exhaustive quantitative modeling effort.

*Comment MN107-7*

The comment claims incremental air emissions is correlated with physical and mental health effects especially to children, elderly and the disabled, but fails to provide any evidence to support these claims or describe how such effects would relate to the proposed Project. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments regarding construction and operational impacts on air quality, including impacts to sensitive receptors.

*Comment MN107-8*

The comment claims, without substantial evidence or expert opinion, that reduced recreation at Towers Elementary School would correlate with physical and mental health impacts but again fails to provide any substantial evidence to support these claims or describe how such effects would relate to the proposed Project.

## Letter MN108

June 8, 2021
Mark Nelson

*Comment 108-1*

The comment identifies and describes seven parcels within the City of Redondo Beach that have a P-CF (Community Facility) zoning and land use designation. Refer to the response to Comment FL1-20 as well as Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

*Comment MN108-2*

The comment states BCHD has a moral obligation to protect the community standard and claims the operation of the former South Bay Hospital District and BCHD campus have created environmental and economic justice impacts. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

*Comment MN108-3*

The comment states average height should be the metric considered for future redevelopment requiring a Conditional Use Permit (CUP) on a P-CF zoned site. Refer to the response to Comment MN30-4.

*Comment MN108-4*

The comment includes an excerpt from Redondo Beach Municipal Code (RBMC) 10-2.2506 which has to do with CUPs. The comment asserts that neither existing or proposed development at the Project site conform with criteria for a CUP due to the size and height of the structures. The comment further asserts the proposed Project would be not comply with CUP criteria based on height, noise, invasions of privacy, and excess generated traffic. The comment further asserts the proposed Project is inconsistent with Residential Design Guidelines for the Beryl Heights neighborhood. Again, it should be noted that the Project site is not located in the Beryl Heights Neighborhood and the Residential Design Guidelines do not apply to the Project site. Refer to the response to Comment MN48-1.

See Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and issuance of a CUP. Further, aesthetic impacts related to height and privacy concerns, noise impacts, and traffic impacts are addressed in detail in Section 3.1, *Aesthetic and Visual Resources*, Section 3.11, *Noise*, and Section 3.14, *Transportation*

respectively. These analyses are supported by technical studies and exhaustive modeling efforts prepared by experts in their fields.

**Letter MN109**

June 9, 2021
Mark Nelson

*Comment MN109-1*

The comment states Phase 2 of proposed Project is ill-defined and the Master Plan is not part of the Draft Environmental Impact Report (EIR). The comment concludes, without substantial evidence, that the Draft EIR is defective and must be remediated and recirculated. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion regarding the more general and programmatic nature of Phase 2 of the proposed Project. no substantial evidence has been provided to suggest that any of the triggers for recirculation described under California Environmental Quality Act (CEQA) Guidelines 15088.5 have been met.

**Letter MN110**

June 9, 2021
Mark Nelson

*Comment MN110-1*

The comment states the Environmental Impact Report (EIR) is defective and must be recirculated because the EIR does not include an alternative that would involve development on the vacant Flagler Lot that conforms with Redondo Beach guidelines for C-2 zoning. Refer to the response to Comment MN97-1.

**Letter MN111**

June 9, 2021
Mark Nelson

*Comment MN111-1*

The comment states the Environmental Impact Report (EIR) must be amended for Phase 2 of the proposed Project. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion regarding the more general and programmatic nature of Phase 2 of the proposed Project.

**Letter MN112**

June 10, 2021
Mark Nelson

*Comment MN112-1*

The comment states, without substantial evidence, that the environmental Impact Report (EIR) is defective and should be revised and recirculated. The comment fails to provide specifications or further details regarding how or why the EIR analysis is insufficient in this regard.

*Comment MN112-2*

The comment claims the Draft EIR does not provide sufficient detail of negative health and environmental impacts associated with incremental emissions, denial of sunlight to residential and recreational uses, noise, vibration, glare, excess nighttime lighting. However, the comment fails to specify any such health impacts and remains speculative. The comment states the EIR is flawed for not considering impacts to recreational resources, including shade and shadow impacts to recreation fields of Towers Elementary School. However, the EIR does include consideration of impacts to recreation and recreational amenities in Section 4.0, *Other CEQA Considerations*. Pursuant to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, impacts of a proposed project on recreational resources are characterized as:

a) A resulting increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and

b) The development of recreational facilities or the construction or expansion of recreational facilities which would result in adverse physical effects on the environment.

As described in Section 4.5, *Effects Found Not to Be Significant*, the proposed Project does not involve the development of recreational facilities and would not substantially increase demand on existing recreational facilities. As a result, the proposed Project would not cause a significant impact on recreation or recreational amenities and additional analysis of the topic is not required. Potential impacts of construction air quality, noise and vibration, transportation, glare, nighttime lighting, and shadow effects are discussed in relevant sections of the EIR, including Section 3.2, *Air Quality*, Section 3.11, *Noise*, Section 3.14, *Transportation*, and Section 3.1, *Aesthetics and Visual Resources*, respectively.

**Letter MN113**

June 10, 2021
Mark Nelson

*Comment MN113-1*

The comment states that the Beach Cities Health District (BCHD) has outstanding California Public Records requests and claims BCHD is actively thwarting intelligent public participation. Refer to the response to Comment MN18-1 as well as Master Response 15 – Purpose of Public Review.

**Letter MN114**

June 10, 2021
Mark Nelson

*Comment MN114-1*

The comment incorrectly states that Environmental Impact Report (EIR) does not sufficiently analyze health impacts on children in relation to air quality impacts and therefore must be remediated and recirculated. Contrary to this commenter's assertion, air quality impacts and health consequences are clearly described in the EIR and supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

**Letter MN115**

June 10, 2021
Mark Nelson

*Comment MN115-1*

The comment asserts that the Draft Environmental Impact Report (EIR) insufficiently assess existing traffic conditions and suggests the proposed parking structure would result in significant adverse traffic impacts. The comment goes on to provide anecdotal photographs including incidents of vehicles parking the wrong way along roadway frontages and asserts congestion at the BCHD entrance is the cause. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues. However, contrary to the commenter's assertion, Section 3.14, *Transportation* also provides a detailed analysis of potential operational design hazards and accident potential. As described more fully in Section 3.14.1,

*Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project.

*Comment MN115-2*

The comment inaccurately claims the historic operation of the South Bay Hospital District and existing BCHD campus have subjected surrounding neighborhoods to environmental justice impacts including chronic stress for over 60 years. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

*Comment MN115-3*

The comment claims BCHD deliberately minimized public participation and provides an image of an editorial piece written by local Bob Pinzler critiquing BCHD's progression of the proposed Project during the COVID-19 pandemic. It should be noted that every effort has been made to increase public participation. For example, five scoping meetings, an unusually high number, were held for the proposed Project. While CEQA Guidelines Section 15105 requires a 45-day comment public review period for a Draft EIR, BCHD, as the lead agency, extended the requisite 45-day public review and comment period to 90 days, from March 10, 2021 through June 10, 2021. BCHD also hosted three public meetings for the Draft EIR. As such, adequate opportunity for public comment has been provided above and beyond the requirements of CEQA.

*Comment MN115-4*

The comment again claims, with no substantial evidence, that the historic operation of the South Bay Hospital District and existing campus have subjected surrounding neighborhoods to environmental justice impacts including light and sirens for over 60 years. T The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue. Further, it should also be noted that the EIR does include a robust discussion potential noise impacts related to emergency medical response. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to this issue.

**Letter MN116**

June 10, 2021
Mark Nelson

*Comment MN116-1*

The comment expresses opposition to BCHD acting as the lead agency. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

**Letter MN117**

June 10, 2021
Mark Nelson

*Comment MN117-1*

The comment expresses opposition to BCHD acting as the lead agency. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

*Comment MN117-2*

The comment states that all of the previous held scoping meetings were required. As described in Comment MN115-3 adequate opportunity for public comment has been provided above and beyond the requirements of CEQA.

*Comment MN117-3*

The comment again expresses opposition to BCHD acting as the lead agency. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

**Letter MN118**

June 10, 2021
Mark Nelson

*Comment MN118-1*

The comment claims operation of the former South Bay Hospital and existing Beach Cities Health District (BCHD) campus has created impacts related to *"operation with significant excavation, initial construction, 510 and 520 building construction, excess traffic and hazards, excess tailpipe*

*exhaust and particulate matter (PM), excess noise, excess sirens, excess outdoor nighttime lighting from both signage and parking lots, shadows, reflections, heat islanding, privacy invasion, chronic stress (Bluezones 'silent killer'), environmental injustice, economic injustice, and a host of other negative impacts."* The comment includes various citations including the BCHD Frequently Asked Questions (FAQ) webpage and articles on stress but makes no clear connection between the cited material and the proposed Project. The comment focuses on perceived grievances from past or current operations but does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, the EIR includes adequate analysis of impacts for community services and population and housing, including Section 3.12, *Population and Housing*, Section 3.13, *Public Services*, Section 3.15, *Utilities and Service Systems*, and Section 4.0, *Other CEQA Considerations*, as well as the impacts that physical changes of the Project may have on a community, including Section 3.1, *Aesthetics and Visual Resources* (e.g., lighting, glare, shading, privacy), Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.9, *Hydrology and Water Quality,* Section 3.10, *Land Use and Planning,* Section 3.11, *Noise*, and Section 3.14, *Transportation*.

The comment also contests that the proposed Project would benefit the community and critiques BCHD's lack of investigation of environmental justice impacts. Purpose and need for the proposed Project is discussed further in BCHD Master Response 3 – Project Need and Benefit. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. See Master Response 16- Environmental Justice for further detail.

*Comment MN118-2*

The comment states the EIR is required to assess negative health effects of $PM_{2.5}$ emissions, particularly to children attending nearby schools. As shown in Table 3.2-4 the EIR clearly considers adjacent recreational land uses and schools – including Towers Elementary School located at a distance of 350 feet from the edge of the BCHD campus. Impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. With the implementation of MM AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments

pertaining to these issues. The comment also provides a citation to the study *Cardiovascular Effects of Environmental Noise Exposure* which is addressed in Comment MN118-4.

*Comment MN118-3*

The comment incorrectly states that the EIR is obligated to address environmental and economic justice impacts. However, contrary to the commenter's asserting, CEQA Guidelines Section 15131, also specifically states *"[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."*

*Comment MN118-4*

The comment summarizes *Cardiovascular Effects of Environmental Noise Exposure*, which considers the health effects of disrupted sleep from traffic noise, and asserts operation of the existing campus currently and implementation of the proposed Project would disrupt sleep and cause adverse health effects related to excess noise such as traffic and siren noise. However, described under Impact NOI-3, the operations at the campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC). Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure substantially contribute to increases in noise pollution that could measurably result in health concerns. With regard to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant.

**Letter MN119**

June 10, 2021
Mark Nelson

*Comment MN119-1*

The comment provides a link to a video file. In the video excerpt, Dan Witters of Gallup National Health and Well-Being Index states that the purpose of the administered Well-Being Index survey is to demonstrate that engagement with Bluezone services provides a positive impact on wellbeing of participants. Witters clarifies that the purpose of the survey is not to quantify impacts of individual programs provided through Bluezone. The comment then states that project objectives are invalid because Beach Cities Health District (BCHD) does not provide statistical analysis of programs. Per California Environmental Quality Act (CEQA) Guidelines Section 15124(b), the purpose of project objectives are to help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision makers in preparing findings or a statement of overriding considerations. This EIR includes Project Objective 2: *"Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services"* and Project Objective 6: *"Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs."* In part, these objectives describe an underlying purpose of the proposed Project. Analysis of quantified impacts of BCHD provided programs is not a prerequisite to the development of project objectives. Refer to Master Response 4 – Project Objectives.

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**Letter MN120**

June 10, 2021
Mark Nelson

*Comment MN120-1*

The comment states that the Environmental Impact Report (EIR) is deficient because it does not reference the Healthy Living Campus Master Plan. As stated in the opening sentence of Section 1.0, *Introduction*, *"[t]his Environmental Impact Report (EIR) evaluates the potential physical environmental impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project)."* The *"proposed Project"* referenced throughout the EIR is an abbreviation for the Beach Cities Health District Healthy Living Campus Master Plan.

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**Letter MN121**

June 10, 2021
Mark Nelson

*Comment MN121-1*

The comment asserts that the primary motivation for the proposed Project is financial and expresses doubt regarding the need for assisted living units or senior care in the area. The comment states there is not substantial evidence regarding whether the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) and the Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) could create a finical benefit through leasing. The comment asserts the Cities Health Center (514 North Prospect Avenue), is not obligated to seismic retrofit or demolition. The comment states their opinion that the No Project Alternative would have a lesser environmental impact that the proposed Project. The comment then suggests the 510 and 520 North Prospect buildings be leased for revenue.

Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to seismic safety. Refer to Master Response 4 – Project Objectives for detailed discussion and a response to comments pertaining to BCHD's intent for implementing the proposed Project.

As described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these three buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD programs.

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**Letter MN122**

June 10, 2021
Mark Nelson

*Comment MN122-1*

The comment contests the finding that the proposed Project would not result in significant impacts to aesthetic and visual resources, specifically impacts regarding skyline views and shade and shadow effects. The comment letter includes Google Earth Pro images intended to represent surrounding areas from which the proposed development would be visible. It should be noted that the EIR's actual finding was that impacts to scenic vistas (i.e., public views of Palos Verdes ridgeline) would be less than significant with mitigation. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to potential impacts aesthetic and visual resources, including sky views and shade and shadow effects.

**Letter MN123**

June 10, 2021
Mark Nelson

*Comment MN123-1*

The comment states the Environmental Impact Report (EIR) analyzes too few representative views and therefore analysis is insufficient and provides Google Earth images of the Project site with a homemade model of the proposed Project from various vantage points. The comment asserts impacts to the surrounding neighborhood character would be adverse and significant. Refer to the response to Comment MN101-1 regarding sufficiency of representative views. Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue.

**Letter MN124**

June 10, 2021
Mark Nelson

*Comment MN124-1*

The comment claims the EIR is insufficient and defective. The comment provides visual images of a homemade Google Earth Pro model of the proposed Project from various vantage points and notes where the model allegedly interrupts skyline views. The images appear to be similar to those provided in the video link included in Comment MN26-1. The comment claims the images demonstrate the proposed Project would have significant impacts to visual character of the surrounding area. Refer to the response to Comment MN101-1 regarding sufficiency of representative views provided in the EIR. Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue.

The attached visuals also claim the proposed Project would create significant shade and shadow impacts. The EIR includes analysis on proposed Project impacts on the existing visual character and quality of public views of the Project site and its surroundings. The EIR also includes analysis of proposed Project shading effects on nearby shadow-sensitive land uses based off criteria set forth in the *City of Los Angeles CEQA Thresholds Guide (2006)*, which state a project would normally be considered to have a significant shade and shadow impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late

October). Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues.

**Letter MN125**

June 10, 2021
Mark Nelson

*Comment MN125-1*

The comment states the proposed Project increased the height and the square footage of the proposed Project despite public comment and therefore, is inaccurately claims to have revised project design based on public input. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

**Letter MN126**

June 10, 2021
Mark Nelson

Comment MN126-1

The comment requests an inventory of received public comments be provided. As described in the response to Comment MN106-3, all public comments were posted after the close of the public comment period. Consistent with CEQA Guidelines Section 15088 of the State, all of the comments received on the Draft EIR, including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on March 24, 2021, April 13, 2021, and April 17, 2021, were reviewed and responded to, as appropriate.

**Letter MN127**

*Comment MN127-1*

The comment asserts that the Beach Cities Health District (BCHD) has predetermined the outcome of the proposed Project by only considering options for development of a Residential Care for the Elderly Building (RCFE). It should be noted that alternative uses were addressed in Section 5.0, *Alternatives* (i.e., hospital and medical office building) but were ultimately discarded because they did not meet the project objectives or because they would result in more severe environmental impacts (e.g., additional trips associated with medical office buildings).

## Letter MR

March 24, 2021
Mark Razavi

*Comment MR-1*

The comment expresses general opposition to the scale of the proposed Project, any substantial evidence. The comment also expresses general concerns, again without substantial evidence or expert opinion, regarding potential adverse effects of demolition and construction in proximity to residences and schools. These issues are addressed in Section 3.1, *Aesthetics and Visual Resources* and throughout the construction impact analysis provided in the Environmental Impact Report (EIR), including Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter MLE

June 8, 2021
Mary L. Eninger
5609 Andrus Avenue
Torrance, CA 90503

*Comment MLE-1*

The comment expresses opposition for the proposed Project, citing impacts to traffic, noise, and air quality, and tree removal as reasons for opposition. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation impacts. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comment pertaining to construction-related and operational noise impacts associated with the proposed Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to air pollutant emissions. The EIR includes adequate discussion of the potential biological impacts and mitigation proposed Project, including compliance with to policies relating to tree preservation. While the proposed Project would require removal of mature trees, all necessary permits would be obtained prior to tree removal. Further, the proposed landscaping plan would include large, landscaped trees to replace

removed vegetation. The landscaping plan would meet landscaping regulations provided in the Redondo Beach Municipal Code (RBMC) and be consistent the Torrance Street Tree Master Plan. Therefore, impacts would be less than significant.

**Letter ME**

June 10, 2021
Mary R.Ewell, M.F.T.
Redondo Beach, District 2

*Comment ME-1*

The comment expresses a historic opposition to the proposed Project and asserts, without substantial evidence, that students would be negatively impacted by air pollution. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to concerns regarding construction impacts on air quality, particularly on nearby sensitive receptors including schools and single-family residences. As described therein, impacts to sensitive receptors would be less than significant with the implementation of Mitigation Measure (MM) AQ-1. This analysis is supported by exhaustive quantitative modeling prepared by prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. The comment does not challenge the thresholds, methodologies, or findings of this analysis.

*Comment ME-2*

The comment challenges the need for the proposed Assisted Living program and Memory Care facility. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need for proposed Project.

Comment ME-3

The comment claims the costs of residence in the proposed Assisted Living program and Memory Care community would be unaffordable for median income Beach Cities residents and would contribute to the wealth divide. The comment also states the implementation of the proposed Assisted Living program and Memory Care community would defy the California governor's mandate for implementing 2,500 affordable housing units in Redondo Beach and suggests the proposed Project is exclusively motivated by profit. For further discussion on the affordability of the proposed senior housing, refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for detailed discussion and response to comments regarding

underlying purpose for the proposed Project. Regarding affordable housing concerns, it should be noted that 10-percent of the proposed units are being considered at below-market rates; therefore, contrary to this comment, implementation of the proposed Assisted Living units may help the City of Redondo Beach meet Regional Housing Needs Allocation (RHNA) for affordable housing.

*Comment ME-4*

The comment states implementation of the proposed Project would be inconsistent with the P-CF (Community Facility) zoning and suggests BCHD instead augment funds towards community services including services that would provide senior care at home. As described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue the existing model to reinvest revenue into community services such as senior care and health programs. As described in Section 3.10.2, Regulatory Setting, under Redondo Beach Municipal Code (RBMC) Section 10- 2.1110, residential care facilities are clearly allowed in areas zoned as P-CF with a conditional use permit (CUP). It should also be noted that the proposed Project would include establishment of Programs of All-Inclusive Care for the Elderly (PACE), a Medicare and Medicaid program that would help people meet their health care needs while remaining in their home/community instead of moving into a nursing home or other care facility.

*Comment ME-5* through *Comment ME-14*

The individual comments provided in this letter are substantially similar to and responded to in Letter AW.

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**Letter MG3**

April 18, 2021
Mary Gaye

*Comment MG3-1*

The comment states the proposed Project and related air quality, noise, and traffic impacts during the duration of the construction period is not wanted by the community. These construction-related impacts are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received,

incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment also asserts, without substantial evidence or expert opinion, that the Assisted Living program. is not needed. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need and benefits of the proposed Project.

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**Letter MG4**

June 9, 2021
Mary Gaye

*Comment MG4-1*

The comment states that the residents of Redondo Beach and Torrance have vocalized opposition to the proposed Project. The comment asserts the proposed Project be stopped, citing there is not a need for an expensive assisted living facility. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to these issues. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

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**Letter MW1**

May 1, 2021
Mary Watkins
401 N. Lucia Ave.
Redondo Beach CA 90277

*Comment MW1-1*

The comment expresses opposition to the proposed redevelopment at the Beach Cities Health District (BCHD) campus. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment MW1-2*

The comment states that the parcel is designated as public land and no additional commercial enterprises should be allowed there. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

*Comment MW1-3*

The comment states, without substantial evidence or expert opinion, that construction of the proposed Project would create traffic impacts which would in turn generate additional air pollution and noise impacts in proximity to residential neighborhoods and schools. These construction-related impacts are addressed in detail in Section 3.14, *Transportation* as well as Section 3.2, *Air Quality*, and Section 3.11, *Noise*. This analysis is supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

*Comment MW1-4*

The comment states that because the proposed Project would involve a change in land use and because of the magnitude of construction required under the proposed Project, the proposed Project should require the approval of a majority of Beach Cities voters. Contrary to the commenter's assertion, the proposed Project would not require a change in land use. Refer to the response to Comment TRAO-4 as well as Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter MLW

June 8, 2021
Mike & Laura Woolsey
Tomlee Avenue Residents

*Comment MLW-1*

The comment expresses general opposition for the proposed Project and requests that it be stopped. The comment states that the proposed Project is too large for the neighborhood and would create negative effects to the community. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter MJ**

March 23, 2021
Mike Jamgochian
Redondo Beach

*Comment MJ-1*

The comment expresses general concerns regarding the duration of construction-related noise impacts. As described in Section 3.11, *Noise* under Impact NOI-1, construction noise levels would result in significant and unavoidable noise impacts to sensitive receptors. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction-related noise impacts.

*Comment MJ-2*

The comment expresses general concerns, without substantial evidence, that the height and scale of the proposed Project would be inconsistent with the surrounding neighborhood character and create a negative impact on aesthetics and visual resources. The comment asserts that these impacts would be exacerbated by the proposed location of the Residential Care for the Elderly (RCFE) Building on northeast corner of the Project site. The comment also states, without substantial evidence, photographs, or other details, that the proposed RCFE Building would be visible from over a mile from the Project site and suggests the Redondo Beach Planning Commission should impose building height and size restrictions. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to building height and visual character. As described therein, development of the proposed RCFE Building would

substantially alter existing views of and across the Project site from representative views surrounding the site. However, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

Master Response 9 – Aesthetics and Visual Resources Analysis also provides a detailed summary of the revisions to the proposed Healthy Living Campus Master Plan intended to reduce the building frontage along the eastern boundary of the campus. In response to the community's concerns described above, BCHD revised the footprint of the RCFE Building was further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east.

*Comment MJ-3*

The comment states that public-private joint venture would create a conflict of interest resulting in a profit-motivated project. The comment suggests that there are financial alternatives to the proposed Project including reducing BCHD operating expenses, selling parts of the property, or proposing a bond. First, as described in Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation. It should also be noted that the No Project Alternative and Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus explore each of the alternatives suggested in this comment.

*Comment MJ-4*

The comment expresses a preference for the No Project Alternative over the proposed Project. The comment also supports the dissolution of BCHD and the disbursement of BCHD assets between the Beach Cities. Although these comment does not address the adequacy of the EIR, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be

advanced to decision makers for further consideration during deliberations on the proposed Project.

**Letter MP**

April 5, 2021
Mike Patel
South Redondo Beach Resident

*Comment MP-1*

The comment expresses support for the proposed Project under the condition that the proposed Project size is reduced by 30 percent. Although these comments do not address the adequacy of the Environmental Impact Report (EIR), they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Comment MP-2*

The comment asserts, without substantial evidence or expert opinion, that the proposed Project would have a tremendous impact on noise and traffic. The comment further states that the residents and the three schools in the area would be impacted. Construction-related impacts to noise and traffic are discussed in detail in Section 3.11, *Noise* and Section 3.14, *Transportation*. These impact analyses are supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or conclusions of these technical studies. Refer to Master Response 12 – Noise Analysis and Master Response 13 – Transportation Analysis for a detailed discussion and response to comments regarding these issues.

It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. It should also be noted that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17).

Again, although these comment do not address the adequacy of the Environmental Impact Report (EIR), the support for a reduction in the size of the proposed Project by 30 percent will be advanced to decision makers for further consideration during deliberations on the proposed Project.

**Letter MW2**

May 26, 2021
Mike Woosley

*Comment MW2-1*

The comment expresses general opposition to the proposed Project, stating it is not in the best interest of the community. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan..

**Letter MW3**

June 3, 2021
Mike Woosley

*Comment MW3-1*

The comment expresses opposition to the proposed Project, stating that the proposed Project would not fit with the scale of the surrounding neighborhood and block skyline views. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter MT1**

May 11, 2021
Mirna Trujillo

*Comment MT1-1*

The comment expresses opposition to the proposed Project due to concerns that Project implementation would distract students the nearby Towers Elementary School and create traffic and dust impacts. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments pertaining to air quality. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation. It should also be noted that the Beach Cities Health District (BCHD) has revised the proposed haul routes (refer to the response to Comment KB-3), which Torrance Unified School District (TUSD) has acknowledged would reduce potential impacts at Towers Elementary School.

**Letter MT2**

May 11, 2021
Mirna Trujillo

*Comment MT2-1*

The comment demands the proposed Project be stopped. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter NO**

April 4, 2021
Naomi Onizuka
Redondo Beach Resident

*Comment NO-1*

The comment expresses general opposition to the proposed Project and denies the need for the proposed Assisted Living units. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For issues related to the purpose and need for the proposed Project refer to Master Response 3 – Project Need and Benefit. Accounting for existing and planned senior housing communities in the vicinity of the Project site, the 2019 Market Feasibility Study prepared by MDS Research Company, Inc. concludes that the proposed senior Assisted Living and Memory Care units are needed and would be filled following the completion of the proposed Residential Care for the Elderly (RCFE) Building described for the Phase 1 preliminary site development plan.

The comment also contends the proposed Project would bring unwanted noise and construction; however, the comment does not challenge any of the comprehensive and detailed analysis of construction-related impacts provided in the EIR, including the significant and unavoidable impacts identified for noise under Impact NOI-1. Further detail on the EIR's noise analysis is provided in Master Response 12 – Noise Analysis.

**Letter PA**

June 10, 2021
Pam Absher

*Comment PA-1*

The comment expresses general opposition to the proposed Project, contesting project benefit and generally citing size, traffic, and costs to tax payers as reasons for opposition. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project.

The commenter states that none of my friends or family use the facility as evidence to suggest that there is no need for the proposed Project. However, there is a clear service population within the Beach Cities and the South Bay. Based on sign in records that were incorporated into the comprehensive trip generation analysis, hundreds of people per day use the Center for Health and Fitness (CHF) alone. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a discussion of the demonstrated need and anticipated benefit of development of the proposed Project, each of which are also discussed at length in Section 2.0, *Project Description*.

Finally, the comment asserts that the EIR is defective but fails to provide substantiating evidence or other identify specific issues with the EIR or impact analysis, mitigation measures, and alternatives that may not have been sufficiently assessed.

**Letter PB**

June 5, 2021
Patricia L. Brown

*Comment PB-1*

The comment expresses general opposition to the proposed Project, stating the proposed Assisted Living units would be unaffordable. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to

the affordability of the proposed senior housing. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment PB-2*

The comment expresses concern regarding construction-related impacts air quality and pollution, noise, and traffic. These issues are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

It should also be clarified that while Phase 1 and Phase 2 would combine for a total construction period of 5 years; however, the comment fails to acknowledge that the implementation of Phase 1 would occur over a period 29 months followed by a substantial gap prior to the implementation of Phase 2 over a period of 28 months.

*Comment PB-3*

The comment expresses general concerns, without substantial evidence or expert opinion, that implementation of the proposed Project would expose sensitive receptors including children and students at Towers Elementary School to harmful emissions. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to concerns regarding construction impacts on air quality, particularly on nearby sensitive receptors including schools and single-family residences. As described therein, impacts to sensitive receptors would be less than significant with the implementation of Mitigation Measure (MM) AQ-1. This analysis is supported by exhaustive quantitative modeling prepared by prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. The comment does not challenge the thresholds, methodologies, or findings of this analysis.

*Comment PB-4*

The comment suggests the primary purpose of the proposed Project is to generate revenue. The comment also suggests the existing Silverado Beach Cities Memory Care Community is sufficient to continue meeting the community's need for assisted living facilities and reiterates opposition. Refer to Master Response 3 – Project Need as well as Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments regarding the underlying purpose of the proposed Project.

**Letter PW**

*Comment PW-1*

The comment expresses concern that the proposed Project would fail financially. The comment expresses doubt that the proposed Project would benefit the community beyond private investors. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and a response to comments pertaining to these issues. Refer to Master Response 3 – Project Need as well as Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments regarding the underlying purpose of the proposed Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter PS**

June 10, 2021
Paul Schlichting
South Broadway
Redondo Beach, CA

*Comment PS-1*

The comment expresses opposition to the proposed *Project, asserting that* Assisted Living *program would be bad for the* community. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will

be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment PS-2*

The comment asserts, without substantial evidence, that the size of the proposed Project would not fit with the surrounding neighborhood. The comment also suggests the existing facilities are adequate to meet current needs. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis a detailed discussion and response to comments pertaining to building height and visual character. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and a response to comments pertaining to the  regarding the need for the Project pertaining to the underlying purpose of the proposed Project. As described therein, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings.

*Comment PS-3*

The comment compares the proposed Project with the recent Kensington Assisted Living Facility. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in California Environmental Quality Act (CEQA) Guidelines Section 15204, which states, that *"[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."*

*Comment PS-4*

The comment expresses concern regarding potential impacts to traffic and public utilities, including sewer, water, and energy facilities. The EIR includes adequate analysis of potential adverse physical effects the proposed Project may have on the community, including Section 3.1*, Aesthetics and Visual Resources;* Section 3.2*, Air Quality;* Section 3.8*, Hazards and Hazardous Materials;* Section 3.10, *Land Use and Planning*; Section 3.11*, Noise; and* Section 3.14, *Transportation*. The EIR also analyzes for effects on community services and population and housing, including Section 3.5, *Energy*; Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*.

*Comment PS-5*

The comment asserts, with no substantiating evidence or clarifying details, that the EIR has many flaws in its reporting and that many have expressed great concern regarding its contents. However, the comment does not identify specific issues, impacts, or mitigations that may not have been sufficiently assessed.

*Comment PS-6*

The comment states community objections should be addressed before the proposed Project is accepted. The comment suggests the Redondo Beach's Community Development Department has not historically considered community objections when considering the approval of projects. In accordance with Section 15088 of the CEQA Guidelines, BCHD, as the lead agency, has reviewed all of the comments received on the Draft EIR for the proposed Project, including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on March 24, 2021, April 13, 2021, and April 17, 2021. All of these comments are included in the Final EIR and are provided written responses. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment PS-7*

The comment suggests the primary motivation of the proposed Project is to generate revenue and again suggests the adverse effects and benefits of the proposed Project have not sufficiently been assessed. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for detailed discussion and response to comments pertaining to these issues. It should be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

The comment also restates concerns that the proposed Assisted Living program would not be affordable to local residents. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments regarding affordability of Assisted Living program and Memory Care community. As described therein, the market

studies prepared by MDS Research Company, Inc. identify that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the campus, referred to in the study as the Primary Market Area. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. Cain Brothers also compared the pricing levels in the MDS market study with the actual monthly fees at the existing Silverado Memory Care Facility on the campus and the Sunrise Assisted Living Facility in Hermosa Beach and verified the reasonableness of the proposed pricing level.

*Comment PS-8*

The comment expresses concern, without substantial evidence or expert opinion, that the level of disturbance over the construction period is incalculable and potentially underestimated. However, this comment fails to acknowledge the technical studies and exhaustive quantitative modeling efforts prepared by experts in their fields. The comment does not challenge any of the thresholds, methodologies, or conclusions of these technical studies.

*Comment PS-9*

The comment suggests the proposed Project gain community acceptance before proceeding. Although these comments do not address the adequacy of the EIR, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

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**Letter PBK1**

March 24, 2021
Phil & Barbara Kiyokane

*Comment PBK1-1*

The comment expresses general opposition to the proposed Project, citing incompatibility with the existing neighborhood character. Refer Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated

into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment PBK1-2*

The comment states, without substantial evidence or expert opinion, that the proposed Project would increase traffic. Transportation impacts have been addressed in detail in Section 3.14, *Transportation.* This analysis is supported by various transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. The comment does not challenge the thresholds, methodologies, or findings of this analysis. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation issues.

**Letter PBK2**

June 3, 2021
Phil & Barbara Kiyokane

*Comment PBK2-1*

The comment expresses general opposition to the proposed Project due to perceived concerns regarding impacts to the neighborhood character, traffic, and privacy issues. Refer to BCHD Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height, visual character, and privacy. Refer to Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation issues. The comment provides no substantial evidence and does not challenge the thresholds, methodologies, or findings of the technical studies and exhaustive quantitative modeling supporting the analysis of these issues. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment PBK2-2*

The comments offers a summary of the existing transportation network along Flagler Lane and Beryl Street, noting queuing and back-ups related to Towers Elementary School. The comment incorrectly identifies an addition of over 400 residences under the proposed Project and expresses concern that the increase in residences and employment would worsen traffic conditions. As

discussed in detail in Section 3.14.2, *Regulatory Setting*, it should be noted that changes in State law now require that California Environmental Quality Act (CEQA) analysis be based on vehicle miles traveled (VMT) by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing level of service (LOS) by measuring intersection congestion and roadway capacity.

Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation (see Appendix J) to help the cities and intersted residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

*Comment PBK2-3*

The comment expresses general concern, without substantiating evidence or expert opinion that construction-related air quality, noise, and impacts could cause adverse health effects to nearby residences and school students. The EIR includes adequate analysis under CEQA for the impacts that physical changes of the Project may have on a community, including Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. Refer to Master Response 10 – Air Quality, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed response to comments pertaining to these issues. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. However, construction schedule would be consistent with Redondo Beach Municipal Code (RBMC) Section 4-24.503 and Torrance Municipal Code (TMC) Section 6-46.3.1. The comment provides no substantial evidence that provides a clear connection between the construction noise levels quantified in the EIR (refer to Table 3.11-16 and Table 3.11-17) and stress or lack of sleep.

*Comment PBK2-4*

The comment suggests the proposed Project be relocated to a location more accessible from major thoroughfares. As described in Section 5.4, *Alternatives Considered but Rejected from Further*

*Analysis*, such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. As described in CEQA Guidelines Section 15126.6(f)(3), *"[a]n EIR need not consider an alternative…whose implementation is remote and speculative."*

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**Letter PDW-1**

June 4, 2021
Philip de Wolff
1408 Diamond Street
Redondo Beach, CA 90277

*Comment PDW-1*

The comment states residences along Diamond Street were not identified in the initial Healthy Living Campus Master Plan and suggests that the concerns for the surrounding neighborhoods voiced by the Beach Cities Health District (BCHD) Board of Directors was disingenuous. These comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. The environmental impact analysis – including the quantitative analysis of air quality and noise – clearly identify the surrounding sensitive receptors (e.g., adjacent residences) and address potential impacts. Refer to the response to Comment PDW1-4 for additional detailed discussions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment PDW-2*

The comment notes the proposed Project would involve construction of the Residential Care for the Elderly (RCFE) Building, which the comment asserts, without substantial evidence or expert opinion, would create shading effects, alter green zones, and noise and air quality impacts. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to the shade and shadow analysis provided in the EIR. It should be noted that the comment does not challenge the thresholds, methodologies, or findings of the shade and shadow modeling, which was prepared by a licensed architect. Open space under current conditions at the Project site is generally limited to landscaping bordering buildings and the hillside along the eastern edge of the campus. However, under the proposed Project, open space would be expanded to include approximately 2.45 acres of programmable open space within the interior of the Project site. Further, the landscaping plan under the proposed Project would include perimeter landscaping along the western and eastern border (Flagler Alley, Flagler Lane, Diamond Street) of the BCHD campus, which would include with intermittent large shade canopy trees and smaller shade trees. Therefore, greenspace and perimeter landscaping would be maintained and enhanced under the proposed Project. Further discussion on construction and operational noise impacts resulting from the proposed Project is provided in Master Response 12 – Noise Analysis. Further discussion regarding construction impacts on air quality, particularly on nearby sensitive receptors including schools and single-family residences is provided in Master Response 10 – Air Quality Analysis.

*Comment PDW1-3*

The comment expresses general concern regarding potential adverse health effects from the proposed Southern California Edison (SCE) substation. The comment states, without substantial evidence or expert opinion, that high voltage causes cancer, but provides no clear connection between the 16 kilovolt (kV) or 4.16 kV lines along North Prospect Avenue that would be brought to the proposed substation. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

*Comment PDW1-4*

The comment claims that the EIR fails to identify the nearby Diamond Street residences and asserts that the EIR omits discussion of impacts that would be experienced by these residences under the proposed Project. However, contrary to this comment, the EIR clearly acknowledges and depicts the single- and multiple-family residences border the campus to the south, east, and west. In response to concerns that the Diamond Street residences are not addressed in the EIR, Section

2.2.2, *Surrounding Land Uses*, of the Final EIR has been revised to specifically *"Single-family residences zoned R-1 by the City of Redondo Beach face the Project site from the southeast along Diamond Street."* However, it remains that the residences nearest to the Project site are located approximately 80 feet from the developed edge of the campus. The EIR conservatively considers this proximity and resulting impacts whenever relevant in resource area analysis (e.g., air quality, noise, etc.). Therefore, the EIR and impact analysis remain adequate and technically sufficient.

*Comment PDW1-5*

The comment incorrectly asserts the EIR does not account for existing hazardous material on the Project site, soil contamination from the former dry cleaners, or acknowledge runoff or construction-related fugitive dust emissions. As described in Section 3.8, *Hazards and Hazardous Materials* the Phase I Environmental Site Assessment (ESA) identified potential sources of contamination including the former dry cleaner located within the Redondo Village Shopping Center. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of the Phase I and Phase II ESAs, the EIR describes compliance with applicable regulations and standards, best management practices, and required mitigation measures to address these conditions during construction. The potential for stormwater runoff is discussed in detail Section 3.9, *Hydrology and Water Quality*. As described in Section 3.2, *Air Quality* the analysis of construction of the proposed Project considers the impacts of $PM_{10}$ and $PM_{2.5}$ (fugitive dust) emissions. Refer to Master Response 11 – Hazards and Hazardous Materials as well as Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment PDW1-6*

The comment predicts, without provided substantiating evidence, that the implementation of the proposed Project would create light pollution. The EIR includes detailed consideration and analysis of impacts with nighttime lighting and glare issues in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment PDW1-7*

The comment states that the sidewalk along the Diamond Street cul de sac adjacent to BCHD should not be included as BCHD property. As described in Section 2.2.1, *Project Location*, the Project sites contain two legal parcels: Assessor's Identification Number [AIN] 7502-017-903 and AIN 7502-017-902. The proposed Project would not expand beyond these properties or outside existing boundaries.

## Letter RPQ

June 8, 2021
Randy & Pamela Quan
Torrance

*Comment RPQ-1*

The comment expresses general opposition to the proposed Project, citing that the proposed development would be too large for the surrounding neighborhood. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For issues related to building height and visual character, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

## Letter RF

March 24, 2021
Reid Fujinaga

*Comment RF-1*

The comment expresses general opposition to the proposed due to concerns regarding hazardous material and air pollutant exposure to school children at Towers Elementary School and claims that the Beach Cities Health District (BCHD) should focus on health rather than real estate development. The Environmental Impact Report (EIR) thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). Exposure to tetrachloroethylene (PCE) in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). Therefore, as discussed further in Section 3.8, *Hazards and Hazardous Materials*, this disturbance of existing soils during construction activities on the BCHD campus has no potential to affect school children at Towers Elementary School. Additionally, the air quality analysis provided in the EIR is supported by a Health Risk Assessment (HRA), which determined that with the implementation of the mitigation measures identified in the EIR (i.e., MM AQ-1, which includes a requirement for U.S. Environmental Protection Agency [USEPA] Tier 4 engines), cancer risk and non-cancer health effects would remain below the thresholds established by the South Coast Air Quality Management District (SCAQMD) (refer to Section 3.2, *Air Quality* and Appendix B). Refer to Master Response 10 – Air Quality Analysis and Master Response 11 – Hazards and Hazardous Materials for further discussion and response to these issues.

**Letter RL**

April 13, 2021
Robert Levy
19314 Tomlee Avenue
Torrance, ca 90503

*Comment RL-1*

The comment states the proposed Project should be rejected due to its size, height, impacts, to noise, and cost. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding building height and visual character. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to construction and operational noise associated with the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to concerns regarding financial feasibility of the proposed Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter *RTGG1***

April 6, 2021

Rosann Taylor
1408 Diamond St.
Redondo Beach, CA 90277

Geoff Gilbert
1406 Diamond St.
Redondo Beach, CA 90277

*Comment RTGG1-1*

The comment request all documentation associated with the proposed electrical Southern California Edison (SCE) substation and analysis of cancer-causing effects of electromagnetic fields (EMFs) associated with the substation. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard a detailed discussion and response to comments pertaining to these issues. It should be noted that the comment does not provide any substantial evidence or expert opinion regarding the assertions that the proposed substation would result in cancer-causing effects. Consistent with California Environmental Quality Act (CEQA)

Guidelines Section 15204(b), *"if persons…believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant."*

Nationally and internationally recognized scientific organizations and independent regulatory advisory groups have been organized to conduct scientific reviews of the EMF research and peer reviewed publications. Their ability to assemble experts from a variety of disciplines to review the full body of research on this complex issue gives their reports credibility. Without exception, these major reviews have reported that the body of data, as large as it is, does not demonstrate that exposure to power-frequency magnetic fields causes cancer or poses other health risks, although the possibility cannot be dismissed. Because of the uncertainty, most reviews recommend further research, and, appropriately, research is ongoing worldwide. The weakness of the reported epidemiological associations, the lack of consistency among studies, and the severe limitations in exposure assessment in the epidemiological studies, together with the lack of support from laboratory research, were key considerations in the findings of the scientific reviews. Additional information is provided in *Understanding electric and magnetic fields*, which can be found here: https://www.sdge.com/sites/default/files/final_emf_s1510006_eng.pdf.

Pursuant to CEQA Guidelines Section 15151, *"[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts."*

## Letter RTGG2

April 6, 2021
Rosann Taylor
Geoff Gilbert

*Comment RTGG2-1*

The comment restates the request for information concerning the 4 kilovolt (kV) electrical substation. Refer to the response to Comment RTGG1-1.

## Letter RT

June 10, 2021
Rosann Taylor

*Comment RT-1*

The comment requests the EIR include an analysis of cancer-causing effects of electric magnetic fields. The comment requests the proposed electrical yard be relocated. Refer to the response to Comment RTGG1 as well as Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for a detailed discussion and response to comments pertaining to this issue.

**Letter RV**

April 13, 2021
Rose Valeriano
Beryl Heights Resident

*Comment RV-1*

The comment expresses general opposition to the proposed Project and states a desire to protect against perceived noise, pollution, and traffic. Refer to Master Response 10 – Air Quality Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for detailed discussion and response to commenters pertaining to these issues. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment RV-2*

The comment expresses a general desire to maintain existing character. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to visual character.

**Letter SY**

June 10, 2021
Susan Yano
Torrance

*Comment SY-1*

The comment requests a glossary for words and phrases used in the Environmental Impact Report (EIR). Consistent with the requirements of the California Environmental Quality Act (CEQA) Guidelines Section 15123 the Executive Summary of the EIR provides a brief summary of the

proposed actions and it consequence with language *"as clear and as simple as reasonably practicable."* In addition, the EIR provides a simplified Reader's Guide to further assist reviewers in understanding the EIR. A glossary is not necessary or required by the CEQA Guidelines.

*Comment SY-2*

The comment questions the need for the Residential Care for the Elderly (RCFE) Building and requests a list of Beach Cities Health District (BCHD) programs and services as well as the cost of these services. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to these issues.

It should be noted that, for decades, BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. For a complete list of school and youth programs, health programs, healthy living programs and other resources provided by BCHD, see the BCHD website here: https://www.bchd.org/.

*Comment SY-3*

The comment implies that the EIR cannot evaluate the construction or operation of the development under Phase 2, without additional detail about the development program. Due to uncertainties in future health and wellness programming, trade-offs associated with site planning and design, and financing considerations, Phase 2 can only be programmatically described at this time. It is anticipated that final selection of a detailed site development plan for Phase 2 would be based on the considerations discussed in Section 2.5.2.2, *Physical Design Considerations and Priority-based Budgeting*, but would not occur until after the completion of Phase 1.

This is clearly in keeping with the requirements of CEQA Guidelines Section 15165, which states:

> *"Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of*

> *several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect."*

As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan.

As described further in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a *"tiered"* CEQA analysis of the proposed Phase 2 improvements, which would involve *"narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report"* (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment SY-4*

The comment expresses general concerns regarding the financing associated with Phase 1 and Phase 2 of the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to this issue. As described therein, BCHD has very clearly and consistently demonstrated that the funding necessary to implement the proposed Phase 1 preliminary site development plan, which is anticipated to cost $235 million, is secured. These funds consist of revenue generated by property assessments, BCHD's health and fitness facilities, and tenant space within the Beach Cities Health Center, as well as leases, partnerships, grants. While funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the RCFE Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory

Care community as well as the Program of All-Inclusive Care for the Elderly (PACE) within the RCFE Building. In addition, BCHD would continue to be able to seek and secure appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

*Comment SY-5*

The comment asserts that as a local Torrance street, BCHD should receive permission from the City of Torrance for the proposed site access along Flagler Lane, and asks whether a new EIR would be required for a new design precluding access from Flagler Lane. Table 3.10-6 in Section 3.10, Land Use and Planning acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

*Comment SY-6*

The comment claims that the proposed Project does not support the project pillars and project objectives. Additionally, the comment questions the affordability of the proposed Assisted Living units. Refer to Master Response 4 – Project Objectives and Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and responses pertaining to these issues. It should be noted that the market feasibility study prepared by MDS Research Company, Inc. found that approximately 70 percent of residents of the proposed senior housing units would come from the Primary Market Area within a 5-mile radius of the Project site. It should be noted that the proposed PACE services would permit seniors to safely remain in their own homes while receiving support to do so.

*Comment SY-7*

The comment lists a series of questions pertaining to the seismic safety of the existing Beach Cities Health Center. Refer to Master Response 3 – Project Need and Benefits as well as Master Response 4 – Project Objectives for a detailed discussion regarding the seismic safety of the Beach Cities Health Center and Beach Cities Advanced Imaging Center. It should be noted that BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public

safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

*Comment SY-8*

The comment requests specific examples of mission-derived services and the amount of revenue needed to replace lost revenues from the vacation and demolition of the Beach Cities Health Center. Mission-derived services include services related to community health and wellness. For example, the existing Beach Cities Silverado Memory Care Community as well as the various outpatient medical office uses on the campus are mission-derived services that generate revenue for BCHD allowing for reinvestment a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission.

It should be noted that CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

*Comment SY-9*

The comment provides a series of questions regarding the proposed open space included in the proposed Project, such as the footprint of the open space during Phase 1 and Phase 2 of the Project, programs and allowable uses planned for this space, noise restrictions, events management, and security. As described in Section 2.5.1.1, *Proposed Uses* the proposed Project would substantially expand open space on the existing campus, including 114,830 square feet (sf) of programmable open space within the interior of the Project site. The development of the proposed Aquatics Center, CHF, and Wellness Pavilion in Phase 2 of the Project would not encroach on or otherwise limit the use of this open space. The central lawn would be sized to accommodate a variety of outdoor community events such as movie nights or group fitness activities. With regard to

community events within the publicly accessible open space, all applicable permits would be obtained from the City of Redondo Beach, as necessary. Additionally, consistent with Mitigation Measure (MM) NOI-3b an Events Management Plan would be prepared and implemented to ensure consistency with the Redondo Beach and Torrance noise ordinances.

The open space would not be privately owned or cordoned off for security purposes; however, as described in Section 2.0, *Project Description*, security features would be limited to access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas. The design of the proposed development would also minimize dead space to eliminate areas of concealment that might attract homeless persons or crime. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of Redondo Beach Municipal Code (RBMC) Section 10-5.1706(c)(10).

*Comment SY-10*

The comment challenges the need for the Assisted Living program. As described in Master Response 6 – Financial Feasibility/Assurance, BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. Field work and analysis were originally completed in April 2016 and updated in August 2018 and May 2019 to reflect the changed number of proposed housing units. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 updated market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards and if the conclusions and demand estimates were reasonable. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology, reasonable assumptions and the conclusions are supported by the analysis, research and data presented in the study. The assertion that there is not a demand for Assisted Living in the Beach Cities is unfounded.

Additionally, the comment suggests that BCHD consider the implementation of a Minnesota Approach, where patients receive care services at home and in community-based settings such as adult care centers. It should be noted that the proposed Project would provide a PACE. As described in Section 2.5.1.1, *Proposed Uses*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services older adults (i.e., age 55 and older with an average age of 76). PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation

therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. For most participants, PACE services would enable them to remain in the community rather than receive care in a nursing home or other elder care facility.

*Comment SY-11*

The comment asserts that the Assisted Living units would not be available to the public, particularly the residents of the three Beach Cities, due to the price of the units. Refer to Master Response 4 – Project Objectives as well as Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and responses pertaining to these issues.

The comment also incorrectly states that the RCFE Building would accommodate 160 residents. It should be clarified, as described in Section 3.12, *Population and Housing*, the proposed Memory Care facility would include 60 double occupancy units that would continue to provide housing for up to 120 people and the proposed Assisted Living facility would support 157 new Assisted Living units that would provide for approximately 177 new residents on the campus.

*Comment SY-12*

This comment again questions the need for the Project and the future community health needs as well as the financial details associated with the RCFE Building included as part of Phase 1 of the proposed Project. Refer to Master Response 3 – Project Need and Benefit, Master Response 4 – Project Objectives, and Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to these issues.

*Comment SY-13*

The comment provides a series of questions regarding the construction noise associated with the Project, particularly the construction schedule and impacts to the sensitive receptors, including residents and school students, in the Project vicinity. The construction hours and duration are detailed in Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*. As described therein, construction associated with Phase 1 would occur over approximately 29 months and construction associated with Phase 2, which would occur over approximately 28 months, would not begin until 2029, approximately 5 years after the completion of Phase 1. BCHD has

proposed the following construction hours for the proposed Project, consistent with RBMC Section 4-24.503 and Torrance Municipal Code (TMC) Section 6-46.3.1:

- 7:30 a.m. to 6:00 p.m. Monday through Friday; and
- 9:00 a.m. to 5:00 p.m. Saturday.

Pursuant to the RBMC and TMC, construction outside of those hours is not allowed, unless permitted by the Building Officer in the case of an emergency or if the Building Officer should determine that the peace, comfort, and tranquility of the occupants of residential property will not be impaired because of the location or nature of the construction activity.

As described in detail under Impact NOI-1 in Section 3.11, *Noise*, with implementation of the proposed noise barriers and Construction Noise Management Plan under MM NOI-1, construction activities associated with the proposed Project would result in noise levels that exceed applicable Federal Transit Authority (FTA) thresholds at sensitive residential receptors in West Torrance adjacent to Flagler Lane and Flagler Alley as well as residences in the City of Redondo Beach along Beryl Street to the north of the Project site. Construction noise levels would not exceed FTA thresholds at Towers Elementary School.

Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to this issue.

*Comment SY-14*

The comment questions what determines the feasibility of the construction of noise barriers to mitigate construction noise levels at the Project site. As described in Section 3.11, *Noise* under Impact NOI-1, the feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership. Again, as discussed under Impact NOI-1, for these reasons noise barriers are most commonly developed to a height of between 10 and 30 feet.

With regard to the question of who will determine feasibility, MM NOI-1 requires that BCHD prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions, in accordance with TMC Section 46.3.1. Therefore, BCHD and the Redondo Beach and Torrance Building & Safety Division will determine specific dimensions of the noise barriers and develop other noise reduction measures in coordination with one another.

The comment asks about the height of the proposed RCFE Building. As described in Section 2.5.1.2, Project Architecture and Design, proposed RCFE Building would have a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet

above the vacant Flagler Lot below. With implementation of a 30-foot noise barrier, sensitive receptors would not be directly impacted by construction noise until development reached a height that exceeded the noise barrier (refer to Table 3.11-19 and Table 3.11-20).

The comment also asks whether construction activities would stop or be prohibited if they result in noise above the FTA criteria. The purpose of the EIR is to disclose potential environmental impacts that could result from the implementation of the proposed Project. As described in Impact NOI-1, implementation of the proposed Project would result in noise levels that would exceed the FTA thresholds. Therefore, the EIR has determined that there would be a temporary, but prolonged significant and unavoidable noise impact related to construction noise. If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall *"state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record"* (CEQA Guidelines Section 15093[b]).

*Comment SY-15*

The comment asks about the number of auger rigs that would be used during construction and the noise level associated with this equipment, as well as the duration of its use on-site. As described in Section 2.5.1.6, *Construction Activities*, one track-mounted auger rig would be used for tiebacks. An auger would be used during excavation and shoring activities during construction of Phase 1 and Phase 2 of the proposed Project. The Construction Noise Handbook prepared by the U.S. Department of Transportation, auger rigs can result in noise levels of 84 dBA $L_{max}$ at 50 feet. However, it should be noted that this piece of equipment would be used along with other construction equipment on the Project site. A detailed list of heavy construction equipment was developed by CBRE as a part of the Construction Management Plan and was included in the construction noise model included in Appendix I. The construction noise model prepared for the proposed Project models the cumulative noise impact of the equipment that would be operating on-site. The construction noise model also takes into account the duration of time that it would take to complete the construction activity, rather than the specific number of times it would be used. It should also be noted that the construction noise model conservatively assumes this equipment would be used over the full duration of excavation activities (3 months), while shoring would realistically only occur over a couple weeks, as described in the Construction Management Plan. Together with the other equipment that would be used during the excavation and shoring phase, construction noise levels would be up to 85 dBA $L_{eq}$ at the nearest sensitive noise receptors, the West Torrance residents adjacent to Flagler Lane and Flagler Alley (refer to Table 3.11-16 and

Table 3.11-17). These noise levels would be further reduced with the implementation of noise barriers as required by MM NOI-1 (refer to Table 3.11-19 and Table 3.11-20).

*Comment SY-16*

The comment questions the duration of asphalt demolition, what tools or equipment would be used for asphalt demolition, and the noise levels associated with these tools. As described in detail in Section 2.5.1.6, *Construction Activities*, Phase 1 asphalt demolition, excavation, grading, and utility work would occur over a 2-month period. The types of equipment that would be used for these activities are also listed in this section. Refer also to Table 3.11-15 for a summary of typical ranges of $L_{max}$ noise levels at 50 feet for typical heavy construction equipment.

*Comment SY-17*

The comment questions what tools or equipment would be used for excavation activities as well as the noise level associated with this equipment. The comment also requests the noise levels associated with Project-related construction haul traffic. Refer to Section 2.5.1.6, *Construction Activities* for a list of the types of construction equipment that would be used during excavation activities. Refer also to Table 3.11-15 for a summary of typical ranges of $L_{max}$ noise levels at 50 feet for typical construction equipment that would be used during construction. The estimated peak period construction traffic noise levels at sensitive receptors are presented in Table 3.11-21 in Section 3.11, *Noise*. Haul trucks typically generate traffic noise levels of 85 dBA $L_{max}$ at 50 feet (FHWA 2008). As detailed under Impact NOI-1 in Section 3.11, *Noise*, temporary construction-related trips would increase daytime noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). The greatest increase in noise levels from construction-related trips would be an increase of 1 dBA on North Prospect Avenue to 70.8 dBA $L_{eq}$ during Phase 1 construction. Other roadways along the haul route would experience a similar increase in noise levels. Noise contributions from these haul truck trips would be imperceptible (i.e., less than 3 dBA). In addition, the Construction Traffic and Access Management Plan under MM T-2, would require that construction haul trucks avoid residential neighborhoods. Therefore, noise impacts from construction-related vehicle trips would be less than significant.

*Comment SY-18*

The comment states that Beryl Street is a 2-lane road and therefore heavy haul trucks would not be able to operate along the inner lane during construction hauling near Towers Elementary School. As described in Master Response 13 – Transportation Analysis and Comment Response KB-3, in response to comments from TUSD and the City of Torrance, the proposed haul routes have been revised in the Final EIR as follows:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from Flagler Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards I-405.
- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesiea Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.
- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

BCHD has incorporated these suggested revisions in keeping with MM T-2, which requires that the proposed haul routes are "*consistent with the Redondo Beach and Torrance General Plan designations.*"

The comment requests the difference in noise levels associated with haul trucks driving along the outer lane and inner lane of 190th Street or Del Amo Boulevard and who will enforce this mitigation. As previously described, according to the Federal Highway Administration (FHWA), haul trucks typically generate traffic noise levels of 85 dBA $L_{max}$ at 50 feet.

The comment also questions who is a sensitive receptor. Refer to Table 3.11-5 for a list of noise sensitive land uses within 1,000 feet of the Project site.

*Comment SY-19*

The comment questions how notice of construction activities to the residents and businesses within 0.25-mile of the Project site prior to construction activities would mitigate construction noise. This measure would be implemented as part of the Construction Noise Management Plan for the proposed Project. Among the other measures included as part of the plan, this measure would ensure residents and businesses in the vicinity of the Project are notified of the start of construction and understand what to expect in terms of activity schedules. Further, BCHD would be required provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise.

*Comment SY-20*

The comment questions the enforceability MM NOI-1, particularly the telephone line that would be provided by BCHD. As described in MM NOI-1, during construction, BCHD would be required to monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Construction Noise Management Plan. Further, BCHD would be required provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD would be required keep a log of complaints and address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions would have the authority require modification to the conditions of the Construction Noise Management Plan for construction-related activities within their respective jurisdictions, to address non-performance issues. CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* An MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

*Comment SY-21*

The comment makes unreferenced claims that the use of jackhammers would produce noise levels of 130 dBA. As described in Table 3.11-15, the U.S. Department of Transportation reports that the operation of jackhammers (without the use of noise control devices or other noise-reducing design features) produce noise levels of 81 to 89 dBA $L_{max}$ at 50 feet from the source.

As previously described, a list of typical construction equipment that would be used for construction of the proposed Project is included in Section 2.5.1.6, *Construction Activities* and a more detailed list of heavy construction equipment developed by CBRE as a part of the Construction Management Plan is included in Appendix I.

The comment goes on to ask a series of questions regarding the proposed use and associated noise levels of chainsaws during Project construction. The comment also makes unreferenced claims that the use of chainsaws would produce noise levels of 120 dBA. As described in Table 3.11-15, the U.S. Department of Transportation reports that the operation of chainsaws (without the use of noise control devices or other noise-reducing design features) produce noise levels of 72 to 82 dBA $L_{max}$ at 50 feet from the source. As previously noted, the construction noise model conservatively models the cumulative noise impact of all equipment that would be used onsite at

the same time. As described in Table 3.11-16, the nearest noise sensitive receptors to the proposed Phase 1 construction activities are the West Torrance residences located approximately 80 feet away. Therefore, unmitigated construction noise levels are projected to be up to As described in Table 3.11-17, the nearest noise sensitive receptors to the proposed Phase 2 construction activities would be the on-site RCFE Building Assisted Living and Memory Care residents.

Comment SY-22

The comment provides a series of questions related the construction-related noise, the students at Towers Elementary School, and the number of residents in the Project vicinity that have lung-related and other terminal diseases. As previously stated, BCHD has revised the proposed haul routes (refer to the response to comment KB-3 as well as Master Response 13 – Transportation Analysis and Comment Response), which TUSD has acknowledged would reduce potential off-site construction noise impacts at Towers Elementary School. Further, on-site construction noise levels would not exceed FTA thresholds at Towers Elementary School (refer to Table 3.11-16 and Table 3.11-17).

Regarding the number of residents in the vicinity of the Project site that have lung-related and other terminal diseases, this comment is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment SY-23*

The comment expresses concern regarding the use of Flagler Lane for trash hauling and questions the frequency of trash hauling. The comment again questions whether the City of Torrance has approved the use of Flagler Lane, a local Torrance street, for the proposed Project. As described under Impact NOI-3 in Section 3.11, *Noise*, trash hauling would occur over an average of 3 days per week, although frequency could increase in summer and immediately following community events on the central lawn or private events at the proposed Aquatics Center. Regarding the site access along Flagler Lane, refer to Comment Response SY-5.

*Comment SY-24*

The comment claims that the use of heavy construction vehicles, equipment, haul trucks, and trash hauling trucks would damage the local streets surrounding the Project site. The construction vehicles, equipment, haul trucks, and trash hauling trucks that would be used for construction and operation of the proposed Project would be typical of common construction equipment and trash trucks currently operating in the vicinity of the Project site. For example, the construction equipment and trucks that would be used for the proposed Project would be similar to those used

for construction of the Kensington Assisted Living Facility in Redondo Beach. Further, trash haul trucks used at the Project site would be consistent with existing trash activities occurring both on-site and in the vicinity. Existing businesses located within the Redondo Village Shopping Center already receive deliveries and trash pick-up via Beryl Street. Additionally, garbage collection also occurs for existing residences within Torrance.

*Comment SY-25*

The comment describes the measures for decontamination and washing of equipment that comes into contact with potential contaminated soil or water and questions how BCHD will collect and dispose of contaminated water to prevent contaminated stormwater runoff. The EIR thoroughly discloses and addresses the potential for water quality impacts due to contaminated soil and water runoff during construction under Impact HYD-1 in Section 3.9, *Hydrology and Water Quality*. As discussed therein, due to the substantial amount of proposed excavation and the potential for extended periods of exposed soils, soil erosion could result in the creation of on-site rills and gullies, clogs in the existing drainage system, and transport of suspended sediments into down-gradient areas of the Project site. This stormwater runoff could also contain eroded construction and demolition debris and associated hazardous materials that would potentially further degrade surface water quality in the vicinity of the Project site. However, potential adverse effects on water quality associated with construction activities would be reduced through compliance with the requirements of the Construction General Permit (State Water Resources Control Board [SWRCB] Order No. 2009-0006-Data Quality Assessment). Prior to beginning any demolition, grading, or construction activities, BCHD must obtain coverage under the General Construction Permit by preparing and submitting a NOI and SWPPP for review and approval by the Los Angeles Regional Water Quality Control Board (RWQCB). In accordance with the Stormwater Management and Discharge Control Ordinance, the BMPs developed for the proposed Project would also be incorporated into a Storm Water Mitigation Plan (SUSMP) to be approved by the Redondo Beach DPW Engineering Services Division and Torrance Public Works prior to the initiation of construction-related activities. The SUSMP would require that BMPs minimize pollutants and reduce stormwater runoff to levels that comply with applicable water quality standards (refer to Impact HYD-1 for detailed discussion of the BMPs that would be required under the SUSMP). Implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of the proposed Project. Therefore, construction-related impacts to water quality would be less than significant.

## Letter SK1

June 10, 2021
Sabrina Kerch

*Comment SK1-1*

The comment claims that the bulk, scale, and height of the development under the proposed Healthy Living Campus Master Plan would block sunlight, blue sky views, and sunsets. Further the comment asserts that it is irresponsible to suggest that residual impacts are less than significant, based on long-range view of the Palos Verdes ridgeline.

First, the comment conflates impacts to scenic views, impacts to the visual character of the Project site and surrounding areas, and impacts to shade and shadows. The EIR does not make any findings to neighbor character based on long-range views from the intersection of Flagler Lane & 190th Street. Impacts to neighborhood character are addressed under Impact VIS-2. These findings are substantiated by photosimulations from five different locations located immediately adjacent to or in close proximity to the campus (refer to Figure 3.1-1) as well as a policy consistency analysis (refer to Table 3.1-2). As described for Representative View 2, Representative View 3, and Representative View 4, would noticeably alter the existing views of the Project site from these locations and would reduce blue sky views as the comment suggests; however, the development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from these locations. In fact, the proposed Project includes many attributes that would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the BCHD campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to issues related to building height and visual character.

Impacts associated with access to sunlight (i.e., shade and shadows) are thoroughly addressed under Impact VIS-4, which is supported by a Shade and Shadow Study (see Appendix M). The shade and shadow study prepared for the proposed Project demonstrate that the adjacent residential structures in Torrance, including on Towers Street, Tomlee Avenue, Mildred Avenue, and Redbeam Avenue would be shaded beyond existing shadows, particularly during the Fall and Winter evenings during Phase 1 and Phase 2 (see Appendix M). However, the vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the campus and the Torrance residences below. During the Fall and Winter, the proposed RCFE Building would also cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). The latest dismissal time for Towers Elementary School students is at 3:12 p.m. for 4$^{th}$ and 5$^{th}$ graders; however, and Towers Elementary School closes at 4:00 p.m. Therefore, shadows cast by the proposed RCFE Building would not have a significant adverse effect on Towers Elementary School. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to issues related to shade and shadows.

The comment also asserts that the proposed Project would block ocean breeze, but does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore wind patterns.

## Letter SK2

June 3, 2021
Sang Kim

*Comment SK2-1*

The comment expresses opposition for the proposed Project, and asserts, without substantial evidence, that the size of the proposed Project being incompatible with the surrounding neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Comment SK2-2*

The comment states that the Draft EIR does not adequately consider alternatives to mitigate impacts, such as positioning development on the western edge of the Project site or incorporating

more subterranean levels. Refer to the response to Comment AW-15 and AW-31 regarding the site planning constraints associated with the existing Beach Cities Health Center. These comments summarize the rational for the development of the building footprint and the revisions to the proposed Healthy Living Campus Master Plan aimed at minimizing the building frontage along the eastern boundary of the campus.

*Comment SK2-3*

The comment states, without substantial evidence or expert opinion, that construction-related dust, noise, and heavy haul trips would disturb the surrounding neighborhood. These issues are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

*Comment SK2-4*

The comment states, without substantial evidence or expert opinion, that a project of the proposed scale does not belong in the neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

**Letter SL1**

April 2, 2021
Sheila W. Lamb

*Comment SL1-1*

The comment summarizes one of the six project objective and requests analyses of forecasted future community health needs, forecasted cost of future health needs, forecasted revenue requirements for future community health needs, and existing and future demand for meeting spaces and interactive education for Beach Cities residents. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a detailed discussion pertaining to the underlying drivers for the proposed Project. As described in Master Response 6 – Financial Feasibility/Assurance the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a *"general description of the project's technical,*

*economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

**Letter SL2**

April 2, 2021
Sheila W. Lamb

*Comment SL2-1*

The comment requests the names of Beach Cities residents who received services from the Beach Cities Health District Campus (BCHD) campus in 2020 and the types of services received. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. However, it should be noted that existing residents, patients, visitors, and staff were estimated for the quantitative study using driveway counts, pedestrian surveys, Center for Health and Fitness (CHF) membership scans, etc. This information was collected by Fehr & Peers and used to inform the development of the existing trip generation associated with the BCH campus.

**Letter SL3**

April 13, 2021
Sheila W. Lamb

*Comment SL3-1*

The comment incorrectly states the EIR omits the Redondo Beach's zoning definition of P-CF and permitted land uses under this definition. The comment also states P-CF zoning is not intended for commercial enterprises. As provided in Section 3.10.2, Regulatory Setting, *"[a]reas zoned as P-CF (Community Facilities) provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community (RBMC Section 10-2.1110). Under RBMC Section 10- 2.1110, residential care facilities are allowed in areas zoned as P-CF with a conditional use permit (CUP)."* Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land- Use Designation for a detailed discussion and response to comments pertaining to this issue.

*Comment SL3-2*

The comment claims the EIR mischaracterizes the scope and reach of BCHD programs and services. The comment also asserts BCHD cannot prove it provides services to 123,000 residents. As described in the response to Comment SL2-1, this comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

*Comment SL3-3*

The comment states, without substantial evidence, that due to the height and size of proposed structures, the proposed development would be visually incompatible with the surrounding neighborhood, block views of the Palos Verdes hills, block skyline views, create shadow effects, and create privacy issues. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to these issues. The comment provides no substantial evidence or expert opinion that challenges the impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*, which is supported by photographs, computer-generated photosimulations, and a shade and shadow analysis, prepared by licensed architects.

*Comment SL3-4*

The comment claims that that less than 20 percent of tenants of the proposed facilities will be from the Beach Cities while the surrounding neighborhoods will be adversely impacted by construction and operation of the proposed Project. First it should be noted that the market feasibility study prepared by MDS Research Company, Inc. and peer reviewed by Cain Brothers identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. It should also be noted that BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services.

Finally, the EIR includes adequate analysis of potential adverse physical effects the proposed Project may have on the community, including Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*. The EIR also analyzes for effects on community services and population and housing, including Section 3.12, *Population*

*and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*. The comment does not challenge the thresholds, methodologies, or findings of this extensive analysis, which is supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

**Letter SL4**

June 9, 2021
Sheila Lamb

*Comment SL4-1*

This comment restates the project pillars and project objectives identified in the Executive summary and Section 2.4.3, *Project Objectives*. The comment claims that the Beach Cities Health District (BCHD) has not satisfactorily demonstrated that the proposed development would generate sufficient revenue, that there are existing or future community health needs that BCHD has identified, or that there is a need for the proposed Assisted Living program. For a detailed discussion and response to comments pertaining to these issues refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives.

*Comment SL4-2*

The comment claims that the alternatives do not show evidence of ability to execute the purpose and objectives of the proposed Project. The comment goes on to claim that two of the alternatives focus on maximizing revenues. It should be noted that this comment appears to be based on the alternatives discussion presented in the Executive Summary. Section 5.0, *Alternatives* provides a detailed discussion of each of the six alternatives that we considered. Each of these analyses provides a detailed discussion on the achievement of each project objective described in Section 2.4.3, *Project Objectives*. The assertion that two of the alternatives focus solely on revenue generation is unfounded, particularly given that revenue generated by the proposed Project or any of its alternatives would be invested into community health and wellness programs and services. The comment also notes that Alternative 6 was not identified in Table ES-2 and Table 5.5-5. This inadvertent omission has been corrected in the Final EIR; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

*Comment SL4-3*

The comment notes that Alternative 6 was not identified in Table ES-2 and Table 5.5-5. This inadvertent omission has been corrected in the Final EIR; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

*Comment SL4-4*

The comment cites Section 2.2.5, *Existing Land Use Designations and Zoning* and incorrect states that there is no language stating human health in the P section of the Land Use Element. The definition of the P land use is taken directly from Policy 1.46.1, which states:

> *"1.46.1 Accommodate governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (schools), cultural (libraries, museums, performing and visual arts, etc.), human health, human services, public utility and infrastructure (transmission corridors, etc.), public and private secondary uses, and other public uses in areas designated as 'P' (I1.1)."*

*Comment SL4-5*

The comment asserts that the proposed Project would alter the visual character of the Project site and surrounding areas in Redondo Beach. It should be noted that under the California Environmental Quality Act (CEQA), aesthetic impacts are qualitative in nature, and generally occur where physical changes would conflict with adopted development standards and would substantially degrade the visual character or quality of public views of the site and its surroundings as set forth in Appendix G of the CEQA Guidelines. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

As described in Redondo Beach Municipal Code (RBMC) Section 10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district are subject to Planning Commission Design Review. The comment cities RBMC Section 10-2.2502, which guides the Planning Commission Design Review. As described in Section 3.1, *Aesthetics and Visual Resources* and Section 3.10, *Land Use and Planning*, the Planning Commission Design Review could further revise the proposed Project (e.g., limit FAR, building height, setbacks, etc.); however, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

*Comment SL4-6*

The comment selectively cites various General Plan land use policies and RBMC sections and claims that the proposed Assisted Living program is not permitted on the Project site, which is zoned as P-CF. However, as described in Section 3.10, *Land Use and Planning* areas zoned as P-CF (Community Facilities) provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community (RBMC Section 10-2.1110). Under RBMC Section 10-2.1110, residential care facilities are clearly allowed in areas zoned as P-CF with a conditional use permit (CUP). As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks are subject to Planning Commission Design Review.

*Comment SL4-7*

The comment states that the proposed Project would increase noise levels in the local neighborhood during construction. This issue is extensively addressed in Section 3.11, *Noise*, with findings supported by exhaustive quantitative modeling. The comment states that noise levels would range between 73 and 98 dBA; however, as shown in Table 3.11-19 and Table 3.11-20, with the implementation of the required Mitigation Measure (MM) NOI-1, noise levels would range between 60 and 82 dBA during Phase 1 and 63 and 83 dBA during Phase 2. Nevertheless, noise levels at sensitive receptors would exceed the FTA *Transit Noise and Vibration Impact Assessment Manual*, of an 8-hour continuous noise level ($L_{eq}$) of 80 dBA and a 30-day average of 75 dBA $L_{dn}$.

*Comment SL4-8*

The comment describes that California Supreme Court Decision Sierra Club v. County of Fresno, Cal. Supreme Court Case No. S219783 (Dec. 24, 2018), makes clear that EIR's must contain clear and detailed discussion of impact significance determinations. The comment goes on to state that In particular, an EIR must explain the nature and magnitude of significant impacts in a manner that adequately informs the public about the health effects of the project's significant impacts.

It should be noted that this case, commonly referred to as the Friant Ranch Case, is summarized in Section 3.2, *Air Quality*. As described therein the California Supreme Court held that the EIR for the Friant Ranch Project – a 942-acre master-planned, mixed-use development with over 2,500 senior residential units, 250,000 square feet (sf) of commercial space, and extensive open space/recreational amenities on former agricultural land in north central Fresno County – was deficient in its informational discussion of air quality impacts as they relate to adverse human health effects.

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District (SCAQMD) in the Friant Ranch case (April 6, 2015, Attachment A), SCAQMD concluded that currently available regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations associated with individual projects. Regional modeling tools are generally designed to be used at the national, State, regional, and/or city levels and are not well equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project directly impact human health in a particular area. Even where a Health Risk Assessment (HRA) can be prepared, however, the resulting maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer or non-cancer health risks as a result of the project.

For local plans or projects that exceed any identified SCAQMD air quality threshold, EIRs typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or an individual project and a particular health effect. In addition, no relevant agency has approved a quantitative method to reliably and meaningfully do so. A number of factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature of the relationship between air pollutants and health effects in conjunction with local environmental variables. Therefore, at the time, it is infeasible for this EIR to directly link a plan's or project's significant air quality impacts with a specific health effect.

As described in Section 3.2, *Air Quality*, which was supported by an exhaustive quantitative modeling effort, with the implementation of Mitigation Measure (MM) AQ-1 construction activities would not result in criteria air pollutants or toxic air contaminants (TACs) that would exceed the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

As described in CEQA Guidelines Section 15204(c), *"[r]eviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence."* No substantial evidence has been presented in this comment to suggest that there would be any other health-related impacts associated with shade and shadows, lighting, noise, electromagnetic fields (EMF), toxic water runoff, etc.

## Letter SW1

June 7, 2021
Shirley Wang

*Comment SW1-1*

The comment expresses general opposition to the proposed construction-related activities, citing general concerns relating to privacy, noise, and traffic as reasons of opposition. The comment also raises concerns about hazardous materials caused by demolition and construction activities, which the comment asserts could be harmful to kids health (e.g., at Towers School). (For clarity the comment asserts that Towers Elementary School is located 100 feet from the Project site; however, as described in the Environmental Impact Report [EIR] it is located approximately 350 feet from the Project site.)

These concerns that have been raised by the comment are thoroughly addressed in the EIR (refer to Section 3.1, *Aesthetics and Visual Resources*, Section 3.11, *Noise*, and Section 3.14, *Transportation*). In fact, significant and unavoidable impacts are identified for noise under Impact NOI-1. The comment does not challenge any of these analyses or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 12 – Noise Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion and response to these issues. Privacy concerns relating to development of the proposed Residential Care for the Elderly (RCFE) Building are also addressed in Master Response 9 – Aesthetics and Visual Resources Analysis.

## Letter SW2

June 15, 2021
Simona Wilson

*Comment SW2-1*

The comment includes an attached image of a flyer that is not produced by the Beach Cities Health District (BCHD) or Wood Environment & Infrastructure Solutions, Inc. (Wood) and requests further collaboration. Neither of the aforementioned parties have contacted the commenters regarding the flyer. This comment is not germane to the Environmental Impact Report (EIR) or its evaluation of physical environmental impacts.

## Letter SGD

April 13, 2021
Stephanie & Gary Dyo

*Comment SGD-1*

The comment expresses general opposition of the proposed Project, identifying the size, height, noise impact, and cost as reasons for opposition. The comment claims, without substantial evidence, that such concerns have been ignored. These issues are clearly addressed in Section 3.1, *Aesthetics and Visual Resources* as well as Section 3.11, *Noise* of the Environmental Impact Report (EIR), which are supported by technical studies and modeling by experts in their fields. With regard to the cost of the proposed Project, refer to Master Response 6 – Financial Feasibility/Assurance. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment SGD-2*

The comment expresses concern regarding construction-related noise and air quality impacts adversely affecting the health of nearby residences and children. The comment asserts, without substantial evidence or expert opinion, that air pollution would increase as a result of the proposed Project. The comment also restates the EIR's finding that noise levels would exceed the Federal Transit Authority (FTA) threshold.

Construction emissions are quantified and shown in Table 3.2-5. As demonstrated described at length in Section 3.2, *Air Quality*, with implementation of Mitigation Measure (MM) AQ-1 emissions generated by construction of the proposed BCHD Healthy Living Campus would not exceed South Coast Air Quality Management District (SCAQMD) thresholds and would not create or contribute to air quality violations. This finding is supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to Master Response 10 – Air Quality Analysis for detailed discussion of construction-related impacts on air quality, including those on nearby sensitive receptors, which include Towers Elementary School and single-family residences located in the vicinity of the Project.

It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. However, while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction-related noise impacts.

*Comment SGD-3*

The comment claims that the implementation of the proposed Project would cause traffic congestion, namely among Del Amo Boulevard, North Prospect Avenue, and Beryl Street. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction-related activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

*Comment SGD-4*

The comment states the current proposed Project is taller and larger than previous iterations and claims, without substantial evidence, that the proposed Project would not fit with the neighborhood character. The comment also states the proposed Project would block views of the Palos Verdes Hills and skyline and create privacy issues with nearby residences. Refer to Master Response 9 –

Aesthetics and Visual Resources for a detailed discussion and response to comments pertaining to these issues. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, conceptual plans for the proposed Healthy Living Campus Master Plans have gone through reiterations in response to community feedback. While the current Healthy Living Campus Master Plan increased the height of the proposed Residential Care for the Elderly (RCFE) Building to 103 feet above the campus ground level, the redesigns also downsized development envisioned in the Healthy Living Campus Master Plan by 107,800 square feet (sf) of occupied building space than proposed under the 2019 Master Plan. Further, as described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1, the proposed RCFE Building would interrupt views of the Palos Verdes hills from Representative View 6. However, implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level to approximately 82.75 feet above existing ground level, ensuring views of the Palos Verdes hills from the Representative View 6 would not be interrupted by the proposed development. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

*Comment SGD-5*

The comment states rent for the Assisted Living units and Memory Care units would be unaffordable. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to this issue.

*Comment SGD-6*

The comment suggests the proposed Project be relocated from Torrance to a different Beach City.. As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities were considered. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned P-CF (Community Facility), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate

these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. However, there are no undeveloped or underdeveloped sites designated as PF within Hermosa Beach, which are also large enough to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan. Similarly, properties designated as Public Facilities within Manhattan Beach are developed and not currently available for purchase. Development at alternate sites within the Beach Cities may also be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project. Additionally, none of the potential alternate sites within the Beach Cities are under ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. Therefore, alternative locations in the Beach Cities were determined not to be feasible for development of the proposed Healthy Living Campus Master Plan.

**Letter SD**

June 6, 2021
Stephanie Dyo

*Comment SD-1*

The comment expresses general opposition towards the proposed Project and associated construction period. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment SD-2*

The comment expresses general concern regarding the height of the proposed Residential Care for the Elderly (RCFE) Building and associated shade and shadow impacts, asserting that the development will block sunlight and views from all directions. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support its assertions. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and responses to issues related to shade and shadow effects and potential impacts on views that could result from the development of the proposed RCFE Building.

*Comment SD-3*

The comment expresses general concern for potential impacts to nearby residences and the nearby school associated related to hazards and hazardous materials. The comment notes that homes and schools are located from 80 to a few hundred feet away. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.8, *Hazards and Hazardous Materials* or provide any substantiating evidence to further support or clarify its concerns. As described in Section 3.8.4, *Project Impacts and Mitigation Measures,* compliance with applicable regulations as well as oversight by the appropriate Federal, State, and local agencies, implementation of applicable of best management practices, and application of prepared mitigation measures would prevent the accidental release of hazardous materials into the environment during construction and operation of the proposed Project. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to these issues.

*Comment SD-4*

The comment expresses general concern for construction-related neighborhood traffic. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction-related activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

*Comment SD-5*

The comment claims the issues in Comment SD-1 through SD-4 have been ignored and therefore the proposed Project should be stopped. As described in the responses to Comment SD-1 through SD-4 these issues have clearly been addressed in detail within Section 3.1, *Aesthetics and Visual Resources*, Section 3.8, *Hazards and Hazardous Materials,* and Section 3.12, *Transportation*. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter SI1**

June 4, 2021
Stephanie Ishioka

*Comment SI1-1*

The comment expresses general concern regarding shade and shadow impacts following construction of the proposed Residential Care for the Elderly (RCFE) Building, noting that the building reach a height of 133 feet over the street level. The comment asserts that under existing conditions it is dark around 4:00 p.m. after the end of daylight savings time in November. The comment asserts that adjacent residences may need to turn lights on as early as 3:00 p.m. and inquires about compensation for extended electricity use due to potential shade and shadow impacts. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-4, the vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (see Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the BCHD campus and the Torrance residences below. Shadow-sensitive uses would not be shaded by the proposed structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be less than significant when compared with the thresholds established in the EIR (refer to Section 3.1.3, *Impact Assessment and Methodology*). Compensation for electricity use is neither required nor appropriate, particularly given the limited extent and short duration of shading. Refer to Master

Response Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows.

*Comment SI1-2*

The comment states the height of the proposed RCFE Building would be the third tallest building in the Beach Cities. This issue is identified (refer to Table 3.1-1) and fully addressed under Impact VIS-1, which identifies a potentially significant impact to scenic views of the Palos Verdes ridgeline from Flagler Lane & 190th Street. For issues related to building height and neighborhood compatibility refer to Master Response 9 – Aesthetics and Visual Resources Analysis. The comment also states that the proposed Project would not be compatible with the surrounding neighborhood the comment does not challenge any specific aspects of the analysis presented under Impact VIS-2 and does not provide any substantiating evidence to further support its assertions. For a detailed discussion and response to comments pertaining to building height and neighborhood compatibility refer to Response 9 – Aesthetics and Visual Resources Analysis.

*Comment SI1-3*

The comment claims that the proposed RCFE Building would create privacy issues and require the use of window coverings. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to privacy concerns associated with the proposed RCFE Building.

**Letter SI2**

June 4, 2021
Stephanie Ishioka

*Comment SI2-1*

The comment generally summarizes the findings of the impact analysis provided in Section 3.11, Noise, including impacts to sensitive receptors located in proximity of the Project site. However, the comment incorrectly states that students at the nearby elementary school would experience noise levels up to 91 dBA. As shown in Table 3.11-16 and 3.11-17, construction noise levels at Towers Elementary School would reach up to 74 dBA. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Refer to Master

Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction-related noise impacts on sensitive receptors.

*Comment SI2-2*

*The comment expresses concern that vibration generated by heavy machinery and heavy haul trucks would cause landslides along nearby slopes including the on-site slope adjacent to Flagler Alley. As described in Section 3.11,* Noise*, under Impact-2, vibration levels from construction equipment and haul trips associated would not exceed the Federal Transit Authority (FTA) thresholds and impacts would be less than significant. Geologic stability of the Project site and surrounding region, including susceptibility of landslides is described in Section 3.6,* Geology and Soils*.* According to the California Geological Survey (CGS) Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone. Similarly, according to the Redondo Beach Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides. Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very low.

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**Letter SJC**

June 10, 2021
Stephen J. Curwick

*Comment SJC-1*

The comment objects to the development of the proposed Southern California Edison (SCE) Substation due to its proximity to residences. The comment notes the existing hillside and landscaping currently act as a buffer between the Project site and neighboring residences. The comment also recommends alternate locations for the proposed substation, including between the 512 parking structure and Flagler alley, the northern edge of the Project site, or behind the proposed Residential Care for the Elderly (RCFE) building. However, as described in Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard, potential locations for the proposed substation are limited to areas where: the substation could be installed early in the project timeline (i.e., outside of active construction zones); the substation would be readily accessible by truck for SCE service and maintenance activities during all phases of project construction and operation; and existing utility connections are present. As such, location of the proposed substation is limited to the southeastern hillside of the Project site. The substation would

be constructed at the toe of the slope adjacent to Flagler Alley, surrounded by a perimeter wall, and screened by proposed landscaping. Nevertheless, this comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment SJC-2*

The comment claims, without substantial evidence, that the proposed residential care facility units would be unaffordable to community members. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments pertaining to this issue.

*Comment SJC-3*

The comment reiterates objection to the proposed substation, stating this placement of the substation would render landscape buffering between the Project site and neighboring residences useless. The comment also expresses concern that the proposed substation would create a safety hazard to nearby residents. The comment also expresses concern construction associated with the substation would create air quality impacts that could affect the safety of nearby residences. Concerns regarding the landscape buffer of the Project site are addressed in Comment SJC-1. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for discussion on the placement and safety concerns related to the proposed substation. Refer also to Master Response 10 – Air Quality Analysis for detailed discussion of construction and operational air quality impacts on nearby sensitive receptors, which include single-family residences located in the vicinity of the proposed Project.

*Comment SJC-4*

The comment states that implementation of the proposed Project, including placement of the proposed substation, would negatively affect neighboring property values. However, the purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this Environmental Impact Report (EIR) as required by CEQA.

*Comment SJC-5*

The comment reiterates objection to the proposed substation due to potential health risks and loss of property values. Refer to the individual responses to Comment SJC-1 through SJC-4.

## Letter SJ

May 24, 2021
Susan Johnson
19333 Sturgess Drive
Torrance

*Comment SJ-1*

The comment expresses general opposition to overdevelopment making unsupported claims that the proposed Project would create more traffic, crime, and homelessness. The comment suggests the City of Torrance focus on remaining clean and safe with accessible services. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

With regard to effects on public services, the EIR includes thorough assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local police protection services. As described Section 3.13, *Public Services* under Impact PS-2*,* the increase in activity level at the Project site could generate the need for law enforcement services. However, the development under Phase 1 and Phase 2 of proposed Project would include the incorporation of security features such as access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas, and minimum dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of Redondo Beach Municipal Code (RBMC) Section 10-5.1706(c)(10). These measures would be effective in deterring criminal activity at the Project site so any increase in crime would not be substantial.

## Letter SK3

April 28, 2021
Susan Kawamoto

*Comment SK3-1*

The comment provides a general statement of opposition to the proposed Project claiming that construction and operation of development under the proposed Healthy Living Campus Master Plan would result in impacts related to hazardous materials, noise, and traffic and to nearby

residents and schools. For a detailed discussion of and response to comments pertaining to these issues refer to Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis.

First, it should be clarified that while Phase 1 and Phase 2 would combine for a total construction period of 5 years; however, the comment fails to acknowledge that the implementation of Phase 1 would occur over a period 29 months followed by a substantial gap prior to the implementation of Phase 2 over a period of 28 months.

With regard to potential impacts to hazards and hazardous materials, the Environmental Impact Report (EIR) thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). While the comment correctly states that tetrachloroethylene (PCE) was identified on the Project site, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Therefore, with the implementation of the mitigation measures identified in the EIR (i.e., Mitigation Measure [MM] HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant. Additionally, the air quality analysis provided in the EIR is supported by a Health Risk Assessment (HRA), which determined that with the implementation of the mitigation measures identified in the EIR (i.e., MM AQ-1, which includes a requirement for U.S. Environmental Protection Agency [USEPA] Tier 4 engines), cancer risk and non-cancer health effects would remain below the thresholds established by the South Coast Air Quality Management District (SCAQMD) (refer to Section 3.2, *Air Quality* and Appendix B).

The comment also raises concerns about noise and vibration during construction, but does not challenge any specific aspects of the quantitative noise and vibration modeling provided in Section 3.11, *Noise*, which identifies a significant and unavoidable impact to adjacent sensitive receptors during construction. However, it should also be noted that the quantitative noise and vibration modeling demonstrated that schools in the area would not experience noise levels exceeding the established thresholds.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to

decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter TT**

*Comment TT-1*

The comment references an uncited study by University of California Berkeley concerning sexually transmitted diseases in nursing homes. The comment does not cite the study, provide a link, or provide the title of the study. This comment does not address adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The Assisted Living program and Memory Care community would operate within accordance of all applicable Federal, State, and local health guidelines as well as State license requirements.

**Letter TO1**

April 5, 2021
Tim Ozenne

*Comment TO1-1*

The letter inquires if the Environmental Impact Report (EIR) adopted the *City of Los Angeles Threshold Guide (2006)* and whether other similar manuals were reviewed or considered for adoption. For context California Environmental Quality Act (CEQA) Guidelines Section 15064.7(a) defines a *"threshold of significance"* as *"an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant."* The Beach Cities Health District (BCHD) has not and is not required to formally adopted the *City of Los Angeles CEQA Thresholds Guide*. Pursuant to CEQA Guidelines Section 15064.7(b) lead agencies have discretion to formulate their own significance thresholds and may use thresholds on a case-by-case basis. CEQA Guidelines Section 15064.7(c) states that *"[w]hen using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency…is supported by substantial evidence."*

As a matter of approach throughout the EIR, the thresholds of significance discussion for each of the environmental issue areas first considered the questions presented in Appendix G of the CEQA Guidelines. Then any adopted or commonly used thresholds from the City of Redondo Beach and the City of Torrance were considered, given the role of these cities as responsible agencies. Finally,

any relevant quantitative thresholds were considered including those published by relevant regulatory agencies, or those used by other local jurisdictions within the Greater Los Angeles Area.

As described in Section 3.1.3, *Impact Assessment and Methodology*, the CEQA Guidelines do not provide thresholds with respect to shade and shadow impacts. Additionally, neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. The *City of Los Angeles CEQA Thresholds* were identified as appropriate thresholds for analysis because they identify clear, unambiguous definitions of sensitive receptors as well as quantitative standards for when shade and shadows would affect such sensitive receptors. It should be noted that this approach is not unique and has been used by a wide number of local jurisdictions within Los Angeles County – including both coastal and inland areas – that do not have their own quantitative significance thresholds for shade/shadow impacts (e.g., City of Santa Monica, City of Long Beach, Culver City, etc.).

**Letter TO2**

April 6, 2021
Tim Ozenne

*Comment TO2-1*

The comment requests documentation demonstrating BCHD formally adopted the *City of Los Angeles CEQA Thresholds Guide (2006)*. Refer to the response to Comment TO1-1.

**Letter TO3**

May 25, 2021
Tim Ozenne

*Comment TO3-1*

The comment summarizes that the Beach Cities Health District (BCHD) is the lead agency for the proposed Project and notes the length of the Environmental Impact Report (EIR). The comment provides a summary of the topics addressed in the remainder of the comment letter. These topics include: BCHD's authority to establish residential facilities, apparent size and compatibility of proposed structures, shade and shadow effects, vehicle traffic, the proposed Program of All-Inclusive Care for the Elderly (PACE) services, and benefits to cost ratio. These issues are described in further detail and responded to individually in the response to Comment TO3-2 through TO3-7..

*Comment TO3-2*

The comment claims that BCHD does not have the legal authority to operate residential facilities. The comment claims, regardless of presumed need, permitted uses on special healthcare district are limited to a defined use and cites H&SC Division 23 Hospital Districts Sections 32000–32492 of the California Healthcare Code. The comment also asserts that non-permitted land uses would not be acceptable through leasing land and working with a partner as an investor or operator. The comment claims H&SC Section 1250, which has to do with State licensing requirements and Section 15432, which has to do with eligibility for State financial assistance, omits language that would designate senior care services and assisted living facilities as permitted uses of a healthcare district. The comment claims BCHD would require approval from its Local Area Formation Commission to establish a residential facility.

These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, for decades, BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. As provided in H&SC Section 32121(j), under State law, healthcare districts are empowered *"[t]o establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services, including, but not limited to, outpatient programs, services, and facilities; retirement programs, services, and facilities; chemical dependency programs, services, and facilities; or other health care programs, services, and facilities and activities at any location within or without the district for the benefit of the district and the people served by the district."* It should also be noted that at least one other California Health District – the Salinas Valley Memorial Hospital District – also operates 72 assisted living beds (see the Salina Valley Memorial Hospital District website here: https://www.svmh.com/about-us/affiliates-partnerships/).

Additionally, all elements of the proposed Healthy Living Campus Master Plan would comply with local zoning regulations. Consistency with the City of Redondo Beach and City of Torrance General Plans is discussed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5.

*Comment TO3-3*

The comment summarizes that the purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project. The comment includes excerpts from EIR findings and states the EIR does not provide quantified analysis of impacts to aesthetic and visual resources. The comment then provides estimated values for apparent size increase, stating the proposed structures would appear 66 to 173 percent taller than existing structures and provides a description of how apparent size might be calculated. The comment notes that the EIR does not provide quantitative data on apparent size. The comment suggests the EIR could have provided analysis on apparent size and additional renderings that depict view impacts from closer the property lines of the Project site. The comment describes how moving closer to an object increases its apparent size. The comment suggests the heights of the building proposed under the proposed Project are not compatible with adjacent land uses. The comment asserts that the EIR does not provide evidence of visual compatibility. The comment concludes by suggesting the EIR requires a complete analysis to aesthetic and visual impacts, including how size changes will appear off-site, before adoption.

First, contrary to the assertion that the EIR provides no evidence to support the findings of the aesthetics and visual resources analysis, it should be noted that the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. The methodology for the preparation of the computer-generated photosimulations is clearly described and replicable. As described in Section 3.1.1, *Methodology, "[e]ach representative view was photographed to establish the existing visual condition from the selected public location. Photosimulations of the Phase 1 preliminary site development plan 3D model were prepared from each representative view to provide a 'before and after' representation for analysis. The representative analysis focuses on changes from existing conditions as they would be experienced by motorists, bicyclists, and pedestrians from the public realm. The base photography and photosimulations at each representative viewing location were independently prepared by VIZf/x. VIZf/x used a Nikon d7100 camera with a 35-millimeter lens giving the closest approximation to the human eye. The source image is comprised of between 8 and 10 vertical renderings captured from a tripod and stitched together to create the source base image. Each rendering is 25 percent of what the actual 35-millimeter lens captures, which minimizes any curvature to the architecture and reduces distortion."*

The comment provides estimates of the apparent size of the structures using visual angles from various viewing locations. In short, the analysis and examples provided in the comment demonstrate that as one gets closer to an object, that object appears bigger. It should be noted that the representative views, which were identified with input from the City of Redondo Beach, generally encircle the BCHD campus (refer to Figure 3.1-1). Representative View 2, 3, and 5 in particular provide views of Project site from a distance of less than 100 feet, which are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter's assertion the height of proposed development is underrepresented in the analysis, even if the EIR does not provide an analysis of visual angles.

Most importantly, while the comment provides an analysis of visual angles, it does not consider the existing setting or intervening structures, and most importantly does not appropriately compare these calculations to any threshold.

Thresholds of significance may be defined either as quantitative or qualitative standards, or sets of criteria, whichever is most applicable to each specific type of environmental impact. For example, quantitative criteria are often applied to air quality, noise, and transportation impacts, while aesthetics and land use are typically evaluated using qualitative thresholds. Appendix G of the CEQA Guidelines states that proposed Project may have a significant adverse impact on aesthetics if:

a) The project would have a substantial adverse effect on a scenic vista;

b) The project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway;

c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?; and/or

d) The project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

As described more fully in Master Response 9 – Aesthetics and Visual Resources Analysis, given the location of the Project site in an urbanized area, impacts associated with visual character are described in the context of applicable zoning regulations for P-CF (Community Facility) and C-2 (Commercial). As described in Section 3.1, *Aesthetics and Visual Resources,* the proposed Project

would comply with the required building height prescribed in Redondo Beach Municipal Code (RBMC) Section 10-2.622, and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. While the design guidelines only apply to buildings and structures in the R-2, R-3, R-3A, RMD, RH-1, RH-2, and RH-3 multiple-family residential zones, they have been conservatively applied to the 217 Assisted Living units and Memory Care units proposed for the RCFE Building. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Aside from the subjective contention that the proposed RCFE Building would be out of place the comment does not contest the consistency of the proposed Project with these policies, which are used as the threshold for impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*).

With regard to the requested analysis of additional renderings of views, CEQA Guidelines Section 15204 clearly states: *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."* As previously described, the six representative views offer a range of public views from public streets, sidewalks, and recreational resources within the vicinity of the Project site. Therefore, the representative views identified and utilized in the analysis of this EIR are considered adequate to inform the analysis of impacts to aesthetics and visual resources consistent with the CEQA Guidelines, and inclusion or consideration of additional representative views is not necessary.

*Comment TO3-4*

The comment incorrectly states that under CEQA, lead agencies must consider how shading and shadows will affect sensitive receptors. As described in the response to Comment TRAO-131, the CEQA Guidelines do not specifically mention the terms *"shade"* or *"shadow."* Shade and shadows are typically only analyzed in an EIR when the lead agency, pursuant to CEQA Guidelines 15064.7(b), adopts methodologies and thresholds for assessing such an impact.

The comment goes on to claim that the EIR and associated shade and shadow analysis (see Appendix M) provide limited analysis of shade and shadow effects. The comment claims that the analysis does not provide adequate thresholds for analyzing shade and shadow effects due to BCHD's lack of experience as a lead agency. The comment states that the EIR does not describe that BCHD has not adopted shade and shadow guidelines or *City of Los Angeles CEQA Thresholds Guide (2006)*. The comment states BCHD has not determined that these guidelines are appropriate

to apply to BCHD owned property. The comment states lead agencies may not arbitrarily establish thresholds to avoid significant impacts and any applied threshold must be backed by substantial evidence. As described in the response to Comment TO1-1, the CEQA Guidelines do not provide thresholds with respect to shade and shadow impacts. Additionally, neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. The *City of Los Angeles CEQA Thresholds (2006)* were identified as appropriate thresholds for analysis because they identify clear, unambiguous definitions of sensitive receptors as well as quantitative standards for when shade and shadows would affect such sensitive receptors. It should be noted that this approach is not unique and has been used by a wide number of local jurisdictions within Los Angeles County – including both coastal and inland areas – that do not have their own quantitative significance thresholds for shade/shadow impacts (e.g., City of Santa Monica, City of Long Beach, Culver City, etc.).

The comment incorrectly suggests the shade and shadow model did not factor in topographical features. As described in Section 3.1, *Aesthetics and Visual Resources*, a shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, *"to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M)."* Specifically, the Project site was modeled using the survey provided by DENN Engineers while the surrounding neighborhood was generated using data from the OpenStreetMap library. These two sources provided the most accurate representation of the site while capturing the wider context to depict how the proposed construction would affect the surrounding neighborhood. The shade and shadow studies were generated in Autodesk Revit 2020 sun lighting utilizing geocoordinates for accuracy. Refer to Master Response 9 – Aesthetics and Visual Resource Analysis for a detailed discussion and response to comments pertaining to the shade and shadow study.

*Comment TO3-5*

The comment states the EIR's vehicle miles traveled (VMT) analysis is flawed because the analysis assumes vehicle trips will be eliminated with the demolition of the 514 Building rather than be displaced. The comment asserts that removing an existing facility would not eliminate all associated travel but would rather displace travel and may even increase VMT.

As described in Section 3.14, *Transportation* as well as Appendix K, the assumptions used to estimate VMT were prepared in accordance with CEQA Guidelines Section 15064.3. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. The VMT study complies with the impact analysis guidelines as detailed in the Governor's Office of Planning and Research's (OPR) Technical Advisory. Per OPR

recommendation, the VMT study reported VMT be reported as *"Home-Based VMT"* per capita for residential projects and *"Home-Based Work VMT"* per employee for the employees of a project site. Home-Based VMT includes all vehicle roundtrips originating from the residence of the trip-maker. Home-Based Work VMT includes only vehicle roundtrips between the residence of the trip-maker and their place of work. Average VMT per capita and per employee determined for the South Bay Cities Council of Governments region, and therefore adequate for the purposes of evaluation of the proposed Project.

*Comment TO3-6*

The comment claims the EIR fails to provide meaningful analysis of the proposed PACE program, including the size of the program, estimated number of participants, and fit with the proposed Healthy Living Campus. The comment states that without estimated number of PACE participants, potential traffic impacts, including impacts to nearby elementary school children cannot be reasonably analyzed. The comment notes lack of specifications regarding operation of PACE transportation services and expresses doubt regarding the financial viability of the proposed PACE program.

The description of the PACE program is discussed in Section 2.5.1.1, *Proposed Uses*, which describes *"PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation."*

The methodology for calculating trip generation is clearly described in Section 3.14.3, *Impact Assessment and Methodology*. The proposed Project's generation of daily vehicle trips was estimated to evaluate whether the Project meets the criteria for the small project screening. Trip Generation, 10th Edition (Institute of Transportation Engineers [ITE] 2017) represents the industry standard for estimating trip generation and is based on a compilation of empirical (i.e., observed) trip generation surveys at locations throughout the country. While ITE Trip Generation is a defensible approach, ITE always recommends utilizing local data where it is available. Based on input from the City of Redondo Beach and the City of Torrance, an empirical trip generation study was conducted at the campus to validate and calibrate ITE trip generation rates to reflect accurate existing site conditions.

Using the empirical driveway and pedestrian counts, Fehr & Peers calibrated the ITE trip generation rates in order to more accurately reflect existing trip generation at the campus. The calibrated trip rates were used to estimate projected trip generation for the proposed Project by phase.

As described in Section 2.5.1.1, *Proposed Uses*, there would be employees who would likely drive to the campus, similar to the existing Community Service employees. However, this program would implement a drop-off and/or van transportation model, with participants coming in the morning and staying throughout the day. PACE would likely require one or two vans, which may also by shared by the Assisted Living program and Memory Care community. PACE would also make use of Los Angeles County Access and/or WAVE shuttles (to the extent that they are available to residents of the City of Redondo Beach and the City of Hermosa Beach) to provide transportation for participants. For these reasons, trip generation for the PACE program was estimated using the calibrated general office rate for the campus, which is 14.7 percent greater than the ITE trip generation rate for this land use type. The total square footage of the PACE program was multiplied by the calibrated trip generation rate to determine the total number of daily trips (see Appendix K, which clearly presents the trip generation for Phase 1 and Phase 2 of the proposed Project).

As described in the Evaluation of Development Strategy: Executive Summary, which is publicly available on the BCHD website here: https://bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf, it is estimated that the PACE program would have 200 daily users. Even with the assumption that a van could hold 10 persons per trip, this would result in a total number of 40 daily round trips. The transportation study prepared by Fehr & Peers conservatively estimates 226 daily trips for the PACE program.

It should also be noted that the proposed Project would implement a Transportation Demand Management (TDM) Plan consistent with Redondo Beach Municipal Code (RBMC) Section 10-2.2406. The alternative transportation and active transportation (e.g., walking, biking, etc.) strategies provided in Mitigation Measure (MM) T-1, which would further reduce Project-related VMT,

Issues related to the financial viability of the PACE program do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to *"supply extensive detail beyond*

*that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124).

*Comment TO3-7*

The comment claims, without substantial evidence there is no need for the proposed Project and suggests that there is not a market for BCHD to generate revenue or continue offering programs. The comment expresses concern that the proposed Project would fail financially, would not be able to generate target revenues, and would not be beneficial to the community. Refer to Master Response 3 – Project Need and Benefit, Master Response 4 – Project Objectives, and Master Response 6 – Financial Feasibility/Assurance for detailed a discussion and response to comments pertaining to these issues.

As described in the comment, if the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall *"state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record"* (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

**Letter TO4**

June 10, 2021
Tim Ozenne

*Comment TO4-1*

The comment claims the Environmental Impact Report (EIR) is deficient and fails to establish that Beach Cities Health District (BCHD), as a special district, has legal authority to establish the proposed Assisted Living program under its special district powers. Refer to the response to Comment TO3-2.

**Letter WC**

May 1, 2021
Warren Croft
509 North Prospect
Redondo Beach, CA 90277

*Comment WC-1*

The comment expresses general opposition to the proposed Project, stating concerns with air quality and noise impacts. The comment claims, without substantial evidence or expert opinion, that the impacts associated with Phase 1 are underestimated. However, contrary to the commenter's assertion, the EIR rigorously adheres to the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.). The claim that impacts are underestimated is unfounded and unsupported by substantial evidence. Refer to Master Response 10 – Air Quality Analysis and Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to these issues.

*Comment WC-2*

The comment states Phases 2 of the proposed Project is unstable and that associated mitigation measures are unclear and lack detail. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic analysis of Phase 2.

The claim that mitigation measures are unclear is also unfounded and unsupported by substantial evidence. The EIR clearly complies with CEQA Guidelines Section 15126.4, *"where potentially significant adverse environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts must also be identified and implemented."* CEQA also requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that "*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*" A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified it Table 11-1.

*Comment WC-3*

The comment states implementation of the proposed Project would increase construction-related traffic, including heavy haul construction vehicles and trips in the area. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction-related activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

*Comment WC-4*

The comment expresses doubt that implementation of the proposed Project would resolve existing off-site parking issues. The comment also suggests the proposed Project would exacerbate existing off-site parking issues. While no longer a CEQA issue, it should be noted that BCHD carefully determined the appropriate number of parking spaces for the development proposed in Phase 1 and Phase 2 based on a shared parking study prepared by Fehr & Peers. The shared parking study was instrumental is ensuring that there would be adequate parking supply on-site in order to avoid spill over into the surrounding residential community. As described in Section 1.5, *Required Approvals*, BCHD would pursue approval from the Redondo Beach Building & Safety Division for shared parking pursuant to Redondo Beach Municipal Code (RBMC) Section 10-1.1706. Refer to the response to Comment EG-3. The claim that the proposed Project would result in off-site parking impacts is unfounded and unsupported by substantial evidence.

*Comment WC-5*

The comment expresses general concerns that construction-related noise cannot be mitigated and would affect nearby residents for the duration of the construction period. Construction-related noise impacts are described in detail within Section 3.11, *Noise* under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Refer also to Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to this issue.

**Letter TC**

April 17, 2021
Tiya Choi

*Comment TC-1*

This comment expresses general opposition to the proposed Project citing debris, noise, traffic jams, and obstruction of views. However, the comment does not challenge any of the analysis provided in the Environmental Impact Report (EIR) or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter VM**

April 17, 2021
Virginia Minami

*Comment VM-1*

The comment suggests that the Environmental Impact Report (EIR) should consider other sites for development including the Southbay Galleria, which the comment asserts is currently declining. As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, alternate sites for the relocation of existing Beach Cities Health District (BCHD) uses and the development of proposed services and facilities were considered. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site (i.e., 9.78 acres or greater, Public or Institutional land use designation, P-CF zoning) to support the uses associated proposed Health Living Campus Master Plan. While the South Bay Galleria is located in Redondo Beach and surpasses the acreage requirement, the South Bay Galleria Site is

zoned as CR (Regional Commercial Zone). BCHD could apply for a zoning change; pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote. Additionally, in January 2019 the Redondo Beach City Council voted unanimously to remodel the existing mall, which features nearly 1 million square feet (sf) of rentable space. Development at alternate sites within the Beach Cities may also be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project, including impacts related to aesthetics, criteria pollutant and greenhouse gas (GHG) emissions, geology and soils, hazardous materials, noise, and transportation. Additionally, the South Bay Galleria, like all other potential alternate sites described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, are not under ownership or management of BCHD, and it may be economically infeasible for BCHD to purchase a new site for the proposed development. Therefore, the South Bay Galleria as an alternative location would not to be feasible for development of the proposed BCHD Healthy Living Campus Master Plan.

**Letter WBJYJL**

June 7, 2021
Wei Yu
Joyce Li
Jonathan Yu
Brianna Yu
19922 Tomlee Ave
Torrance, CA 90503

*Comment WBJYJL-1*

The comment expresses general opposition the proposed Project citing concerns about safety and a disruption to a peaceful living style. However, the comment does not challenge any of the analysis provided in the Environmental Impact Report (EIR) or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Letter WVS**

May 24, 2021
William & Vivian Shanney

*Comment WVS-1*

The comment claims that the Environmental Impact Report (EIR) is both biased, while also identifying significant impacts to surrounding neighborhoods. The claims of bias are addressed in the responses to WVS-2 and WVS-3. The comment correctly describes that a significant and unavoidable impact has been identified. However, it should be clarified that the EIR identifies one significant and unavoidable noise impact (refer to Impact NOI-1) that would occur for the duration of construction of both phases of the proposed Project, all other resource areas assessed in the EIR determined that impacts would either be less than significant or less than significant with mitigation measures.

*Comment WVS-2*

The comment claims that the selected representative views misrepresent the size of the proposed Project. To fully and accurately assess impacts associated to aesthetic and visual resources, a total of six views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and other public gathering places (e.g., Dominguez Park) in the Project vicinity. These six representative views encircle the campus and provide west, southwest, south, and northeast facing views of the Project site. These views were identified with input from the City of Redondo Beach and offer a range of public views from different areas of the surrounding neighborhoods and include views of various elements of the proposed Project, such as the proposed Residential Care for the Elderly (RCFE) Building, ornamental landscaping, and the steep grade and retaining wall located on the Project site's eastern border.

For example, Representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represents views of the Project site from the residential neighborhood within Torrance adjacent to the east of the Project site. Likewise, Representative View 2 was selected because it represents the view of the steep grade, retaining walls, and landscaped vegetation along the eastern border of the Project site, which is visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street.

The photosimulations from the six Representative Views presented in the EIR were prepared utilizing photographs which depict existing development (i.e., houses, streetlights, etc.), thereby allowing for clear comparison of proposed structures with the scale of existing development. Additionally, the size of proposed development is also described through numerical values including feet and stories for height and square feet for spatial footprint throughout the EIR. As such, the representative views and subsequent analysis included in the EIR are not biased and provide a sufficient depiction of proposed development. Refer to Master Response 9 – Aesthetics

and Visual Resources Analysis for further a detailed discussion and response to comments for issues pertaining to aesthetics and visual resources.

*Comment WVS-3*

The comment asserts that the proposed Project would have unmitigable impacts related to dust emissions and noise during construction. As described in the response to Comment WVS-1 the EIR does acknowledge significant and unavoidable impacts associated with construction-related noise. These impacts would be mitigated to the maximum extent feasible through the implement of MM NOI-1; however, this temporary, but prolonged impact would remain significant and unavoidable. The comment misrepresents potential impacts associated with air quality. As described in Section 3.2, *Air Quality* under Impact AQ-2, the proposed Project would include mitigation measures that would reduce criteria pollutant and toxic air contaminant (TAC) emissions. As described in  to levels below the thresholds established by the South Coast Air Quality Management District (SCAQMD). With the implementation of the required mitigation, impacts would be less than significant.

The comment does not challenge any specific aspects of the analysis presented in Section 3.11, *Noise* or Section 3.2, *Air Quality*. Additionally, this comment does not provide any substantiating evidence to further support its assertions.

**Letter WS**

June 7, 2021
Wendy Spadaro

*Comment WS-1*

The comment expresses general opposition to the Project, citing the high cost of the proposed Assisted Living and Memory Care units that would be developed as a part of the Residential Care for the Elderly (RCFE) Building. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. Refer also to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units.

*Comment WS-2*

The comment expresses concern regarding the duration of the construction period and related, noise, traffic, air quality and hazardous emissions. These concerns that have been raised by the

comment are thoroughly addressed in the EIR (refer to Section 3.11, *Noise*, Section 3.14, *Transportation,* Section 3.2, *Air Quality*, and Section 3.8, *Hazards and Hazardous Materials*). In fact, significant and unavoidable impacts are identified for noise under Impact NOI-1. The comment does not challenge any of these analyses or provide any substantiating evidence to further support or clarify the concerns that have been raised.

The comment also expresses specific concerns that Towne Avenue Elementary School may be adversely affected by hazardous emissions. However, Towne Avenue Elementary School is located over 6 miles from the Project site and is separated by several residential neighborhoods, manufacturing districts, and regional transportation corridors, including Interstate [I-] 110 and I-405 as well as State Route [SR] 107 and SR-213. The distance between the Towne Avenue Elementary School and Project site is great enough that potential impacts to air quality and noise would be negligible.

*Comment WS-3*

The comment suggests the existing Silverado Beach Cities Memory Care Community currently meets the need for assisted living facilities and reiterates opposition to the Project. It should be noted that the Silverado Beach Cities Memory Care Community provides specific memory care services. While this use would be retained under the proposed Healthy Living Campus Master Plan, additional new services (e.g., Assisted Living, Programmatic All-Inclusive Care for the Elderly [PACE], etc.) would also be developed under the proposed Project. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments on issues pertaining to the need for an Assisted Living program in the region.

*Comment WS-4*

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

## Letter WK

June 9, 2021
William Kelley
510 Harkness Lane
Redondo Beach CA 90278

*Comment WK-1*

The comment expresses general concerns regarding the size and scope of the proposed Project, and potential impacts related to traffic, noise, air quality, overcrowding, and compatibility of the proposed development with the character of the surrounding neighborhood. However, the comment does not challenge any of the analysis provided in the Environmental Impact Report (EIR) or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Comment WK-2*

The comment asserts that the streets surrounding the campus are already congested and that additional construction-related traffic would exacerbate this issue. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.12, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction activities within their respect jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

*Comment WK-3*

The comment suggests that the proposed programming and services that would be developed under the Healthy Living Campus Master Plan should be distributed across multiple, smaller sites, rather than being co-located within the existing campus. This suggestion contains some similarities to

Alternative 5, which would relocate the Center for Health and Fitness (CHF) permanently, allowing for a reduced sized parking structure during the construction of Phase 2. However, the majority of the uses associated with the proposed Project have a close relationship to one another. For example, residents within the Assisted Living units and Memory Care units would also be expected to use the Program of All-Inclusive Care for the Elderly (PACE) and other services programmed for the proposed RCFE Building in Phase 1 as well as the programming and services included in Phase 2. Further, this approach would not provide the amount of programmable and publicly accessible open space included in the proposed Project. As such, this alternative would not meet the following project objectives:

- Provide sufficient public open space to accommodate programs that meet community health needs.
- Address the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces.
- Redevelop the Project site to create a modern campus with public open space and facilities designed to meet the future health needs of residents, with meeting spaces for public gatherings and interactive education.

Any alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site to support the uses associated proposed Health Living Campus Master Plan. If found, development at alternate sites within the Beach Cities may still be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project, including impacts related to aesthetics, criteria pollutant and greenhouse gas (GHG) emissions, geology and soils, hazardous materials, noise, and transportation.

*Comment WK-4*

The comment requests adherence to General Policy Plan Article 1.46.4. This may be a reference to Policy 1.46.4 of the Redondo Beach General Plan Land Use Element which requires the city to *"establish standards for the City and coordinate with other public agencies to ensure that public buildings and sites are designed to be compatible in scale, mass, character, and architecture with the existing buildings and pertinent design characteristics prescribed by this Plan for the district or neighborhood in which they are located."* As described in 3.10, *Land Use and Planning*, implementation of the proposed Project would be consistent with applicable land use plans,

policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The comment does not challenge any specific aspects of this policy consistency analysis and does not provide any substantiating evidence to demonstrated any such conflict with General Policy Plan Article 1.46.4.

### 9.3.7 Oral Comments

9.3.7.1 Wednesday, March 24, 2021

**Melanie Cohan**

*Oral Comment MC-1*

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Oral Comment MC-2*

The comment requests a study to show the need for the proposed Assisted Living program and asks who will be able to afford the proposed Assisted Living Units. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to these issues. As described therein, the matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, this need for the proposed Project has been discussed in detail at numerous well-noticed public hearings.

*Oral Comment MC-3*

The comment raises the issues of the previously abandoned and plugged oil and gas well as well as hazardous building materials. Each of these issues is addressed in detail in Section 3.8, *Hazardous and Hazardous Materials*, with analysis supported by Phase I and Phase II Environmental Site Assessment (ESAs) as well as follow-up investigations to identify the precise location of the abandoned and plugged oil and gas well.

As described in Master Response 11 – Hazards and Hazardous Materials Analysis, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and

excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to Mitigation Measure (MM) HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet.

With regard to potential hazardous building materials, based on the age of existing structures, building materials may contain asbestos-containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs). Improper attempts to remove ACM can release asbestos fibers into the air. However, as required by MM HAZ-1, surveys for ACM, LBP, and PCBs would be conducted by a licensed contractor(s) prior to and during the demolition activities. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and mold to ensure public safety, such as sealing off an area sealing off an area with plastic and filtering the affected air to ensure that no asbestos fibers are let out into the surrounding environment. Therefore, implementation of mitigation measure MM HAZ-1 and compliance with existing mandatory regulations and abatement procedures for the treatment, handling, and disposal of ACM, LBP, PCBs and mold, would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools.

*Oral Comment MC-4*

The comment states that there is only a brief explanation of Phase 1 and Phase 2 of the proposed Project presented in the videos on the BCHD website. It should be noted that these are short videos that summarize the nearly 60-page Project Description, which meets all requirements of CEQA Guidelines Section 15124.

**Craig Cadwallader**

*Oral Comment CC-1*

The comment describes the commenter's opinion that the Environmental Impact Report (EIR) was well done in scope and depth and it covered all the concerns that are appropriate in a Draft EIR. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers.

**Susan Yano**

*Oral Comment SY1-1*

The comment asks whether the EIR is supposed to address the financial impacts of the proposed Project. As described in Master Response 6 – Financial Feasibility/Assurances, while CEQA states that an EIR should provide a description of the project, including a *"general description of the project's technical, economic, and environmental characteristics,"* the lead agency is not required to do so if the information *"does not supply extensive detail beyond that needed for evaluation and review of the environmental impact"* (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

*Oral Comment SY1-2*

The comment asks what would happen in the result of a budget overrun. Refer to Master Response 6 – Financial Feasibility/Assurances for a detailed discussion and response to comments pertaining to this issue.

*Oral Comment SY1-3*

The comment asks are the uncertainties in the future health and wellness programming needs and findings. Refer to Master Response 6 – Financial Feasibility/Assurances as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to these issues.

The comment goes on to question why the proposed Residential Care for the Elderly (RCFE) Building is larger than the Wellness Center, Aquatic Center, and Center for Health and Fitness. Although these comments do not address the adequacy of the EIR, as discussed below, they have

been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

*Oral Comment SY1-4*

The comment expresses disbelief that with the exception of noise, the EIR identifies impacts that would be less than significant or less than significant with mitigation. The commenter asserts that the previously plugged and abandoned oil well and contaminated soils have not been addressed. However, contrary to this assertion, these issues have been addressed in detail in Section 3.8, *Hazards and Hazardous Materials*, with analysis supported by Phase I and Phase II Environmental Site Assessments (ESAs) as well as various follow-up investigations, including excavation of the previously plugged and abandoned oil and gas well to identify its precise location. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis.

*Oral Comment SY1-5*

The comment expressing concern about the management of the construction program and states as an example that BCHD has not accurately located the fence on the vacant Flagler Lot. The commenter asserts that the fence is located on City of Torrance property. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Fred**

*Oral Comment F-1*

The comment asks if any other location has been considered for the proposed Project. It should be noted that the Environmental Impact Report (EIR) does consider alternate locations. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other

essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of the Beach Cities Health District (BCHD), and it would be economically infeasible for BCHD to purchase a new site for the proposed development.

*Oral Comment F-2*

The comment suggests, without substantial evidence, that the EIR is faulty because it takes nothing into consideration. However, contrary to the commenter's assertion, the EIR rigorously adheres to the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

*Oral Comment F-3*

The comment states, without substantial evidence, that the noise mitigation measures are insufficient. However, the comment fails to acknowledge the considerable discussion regarding the feasibility of the measures included in Mitigation Measure (MM) NOI-1. Impact NOI-1 clearly identifies discusses issues related to the feasibility. As described therein:

> *"[t]he feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership…For Phase 1 and Phase 2 construction, the necessary noise barrier heights (i.e., up to 105 feet) at the edge of the BCHD development footprint are too great to allow only one- to three-sided barriers and the total building footprint is too large to construct a fully enclosed four-sided noise barrier. Further, the construction of the foundation and framing structure required to support a fully enclosed four-sided noise barrier would result in significant and unavoidable noise impacts to adjacent residential areas in Redondo Beach and West Torrance.*
>
> *A shorter noise barrier could be constructed at the edge of the sensitive receptors in West Torrance (and similarly in Redondo Beach). However, any such off-site construction of a noise barrier would require approval from the City of Torrance and/or the City of Redondo Beach, which cannot be assured. Additionally, while the construction of a 30-foot-tall noise barrier may be feasible along Flagler Lane and Flagler Alley, a 30-foot noise barrier along Beryl Street and North Prospect Avenue fronting residences may not be feasible."*

### 9.3.7.2 Tuesday, April 13, 2021

**Mark Nelson**

*Oral Comment MN1-1*

This comment suggests a context to review the Draft Environmental Impact Report (EIR), providing an example of a previous vote the fund the South Bay Hospital. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

*Oral Comment MN1-2*

This comment claims that a big data analysis was used to analyze the scoping comments, which the commenter asserts were most heavily weighted toward building height than construction duration or actual size. The comment goes on to claim that the scoping comments related to building height were ignored. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis. Not only were the scoping comments not ignored, the Beach Cities Health District (BCHD) interrupted the preparation of the California Environmental Quality Act (CEQA) to revise the proposed Project in an effort to limit building frontage along the eastern boarder of the BCHD campus.

Potential impacts to scenic vistas are described under Impact VIS-1 and the potential impacts to visual character are described under Impact VIS-2. The impact to scenic views, would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190$^{th}$ Street & Flagler Lane. Mitigation Measure (MM) VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas.

*Oral Comment MN1-3*

The comment states the intersection of West 190th Street & Prospect is the highpoint, not the intersection of West 190th Street & Flagler lane is not the highpoint. The comment goes on to request a visual analysis from this location. With regard to maximum elevation views along West 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190th Street that provide slightly elevated views – including the intersection of Prospect & West 190th Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource. With regard to the requested analysis of additional representative views, California Environmental Quality Act (CEQA) Guidelines Section 15204 clearly states: *"CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."*

*Oral Comment MN1-4*

The comment states that BCHD should propose noise barriers that are at least as tall as those used during the construction of the Legado Redondo development. The commenter asserts, without substantial evidence, that these noise barriers were greater than 30 feet in height. However, the comment does not acknowledge or contest the discussion of feasibility provided under Impact NOI-1, which describes:

> *"[t]he feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership…For Phase 1 and Phase 2 construction, the necessary noise barrier heights (i.e., up to 105 feet) at the edge of the BCHD development footprint are too great to allow only one- to three-sided barriers and the total building footprint is too large to construct a fully enclosed four-sided noise barrier. Further, the construction of the foundation and framing structure required to support a fully enclosed four-sided noise barrier would result in significant and unavoidable noise impacts to adjacent residential areas in Redondo Beach and West Torrance.*
>
> *A shorter noise barrier could be constructed at the edge of the sensitive receptors in West Torrance (and similarly in Redondo Beach). However, any such off-site construction of a noise barrier would require approval from the City of Torrance and/or the City of Redondo Beach, which cannot be assured. Additionally, while the construction of a 30-foot-tall noise barrier may be feasible along Flagler Lane and Flagler Alley, a 30-foot noise barrier along Beryl Street and North Prospect Avenue fronting residences may not be feasible.*

*Oral Comment MN1-5*

The comment states that the project objective related to seismic safety is invalid because there is no legal obligation for the demolition of the Beach Cities Health Center. However, it should be noted that BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

*Oral Comment MN1-6*

The comment asserts, without substantial evidence, that the proposed Project would have a significant negative impact on aesthetics. The comment claims, without substantial evidence (e.g., calculations), the average height of the proposed development would be approximately three times greater than the existing Beach Cities Health Center. The comment claims that the City of Redondo Beach uses average height to determine aesthetics and visual impacts; however, the EIR for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 2013121065) as well as the EIR for The Waterfront (SCH No. 2014061071) review the maximum building height in the context of consistency with the Redondo Beach Municipal Code (RBMC). The analysis of visual character provided in Impact VIS-2 is consistent with this approach.

**Geoff Gilbert**

*Oral Comment GG-1*

The comment states that Phase 1 would include the removal of landscaped trees along Diamond Street to provide space for the proposed Southern California Edison (SCE) Substation. The comment asserts that this would significantly reduce or eliminate the greenspace buffer zone.

Potential locations for the proposed substation are limited to areas where: the substation could be installed early in the project timeline (i.e., outside of active construction zones); the substation would be readily accessible by truck for SCE service and maintenance activities during all phases of project construction and operation; and existing utility connections are present. As such, location of the proposed substation is limited to the southeastern hillside of the Project site.

However, the electrical substation would be surrounded by a perimeter wall and screened by proposed landscaping, establishing a new buffer between the proposed substation yard and the adjacent residents. The proposed SCE Substation would only be visible from Flagler Alley and limited segments of Diamond Street. Views of the proposed substation would be blocked from other locations by intervening structures and/or landscaping. As such, this element of the proposed Project would not have a significant adverse impact of aesthetics and visual resources.

*Oral Comment GG-2*

The comment asserts that removal of the greenspace buffer would affect air quality by eliminating the natural filtration and screening barrier. It should be noted that issues related to operational air quality are discussed in detailed in Section 3.2, *Air Quality*, which is supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. It should be noted that operational impacts associated with the proposed Project would be less than significant. Additionally, the proposed landscape would continue to provide a screening barrier between the proposed SCE Substation and surrounding development.

*Oral Comment GG-3*

The comment asserts that the operational noise of the proposed Southern California Edison (SCE) Substation was not considered. Refer to Master Comment Response – Noise Analysis for a detailed discussion and response to comments pertaining to this issue. While the analysis does not explicitly identify noise impacts from the proposed substation, medium voltage distribution system, and generator yard, noise impacts of these improvements are considered to be negligible. According to the National Electrical Manufacturers Association (2014) and the Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50 feet, which is well below the ambient day-night average noise level ($L_{dn}$) noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed substation would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment.

For other issues associated with the proposed substation, refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

*Oral Comment GG-4*

The comment states that the greenspace on Diamond Street has been an issue of contention and claims that EIR dismisses impacts to biological resources as result of the proposed Project. However, contrary to the commenter's assertion, the EIR does not disregard the greenspace. Rather, the issue of vegetation removal is discussed at length in Section 3.3, *Biological Resources* under Impact BIO-1. This analysis was supported by the preparation of a Tree Inventory Report prepared by Carlberg Associates. The discussion acknowledges the removal of approximately 20 landscaped trees along Flagler Lane (north of Towers Street). However, these trees would be replaced within new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal Code (RBMC) Section 10-2.1900. Additionally, the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane (refer to Section 3.3.2, *Regulatory Setting*). As shown in Figure 2-7, the electrical yard would be screened with flowering ornamental trees and shade trees. Therefore, the EIR finds that long-term impacts would be less than significant. The comment does not challenge the thresholds or methodology used to reach these conclusions in the EIR.

**Sheila Lamb**

*Oral Comment SL-1*

The comment claims that the discussion of the existing land use designation misleads the public because it omits the Redondo Beach Municipal Code (RBMC) zoning definition of P-CF (Community Facilities) and its permitted uses. As described in the response to Comment SL4-6 as well as Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, areas zoned as P-CF (Community Facilities) provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community (RBMC Section 10-2.1110). Under RBMC Section 10-2.1110, residential care facilities are clearly allowed in areas zoned as P-CF with a conditional use permit (CUP). As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks are subject to Planning Commission Design Review.

*Oral Comment SL-2*

The comment claims that the project objectives mislead the public by mischaracterizing the scope and reach of the Beach Cities Health District (BCHD) programs and services. As described in the response to Comment SL2-1, this comment does not address the adequacy of the Environmental

Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the underlying purpose for the proposed Project.

*Oral Comment SL-3*

The comment claims, without substantial evidence, that the proposed Project is too tall for the adjacent neighborhoods. The comment goes on to claim that the proposed Project would block views of the Palos Verdes ridgeline, block blue sky views for neighbors, and cast shadows. Each of these issues are discussed at length in Section 3.1, *Aesthetics and Visual Resources*. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. The comment does not challenge any specific aspect of the methodologies, thresholds, or findings of the impact analysis. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character as well as shade and shadows.

*Oral Comment SL-4*

The comment claims that the proposed Project is a commercial enterprise and that BCHD is chartered and funded to serve residents of the Beach Cities. However, as described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

**Sabrina Kerch**

*Oral Comment SK-1*

The comment identifies the photosimulation at Representative View 6 and notes that nobody lives at that location. Instead, the commenter requests a photosimulation from their street, Tomlee Avenue. First it should be noted that the California Environmental Quality Act (CEQA) requires an analysis of public views, including public roads, sidewalks, and other public viewing locations.

In 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views are not considered under CEQA (Public Resources Code Section 21082.2).

The comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2. The impact to scenic views would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane. MM VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. This analysis is supported by Representative Views 1 through 5, which surround the Project site (refer to Figure 3.1-1). It should be noted that Representative View 1 is taken from Tomlee Avenue, as requested by the comment.

*Oral Comment SK-2*

The comment questions what the level of construction-related traffic will be like during construction activities associated with the proposed Project. Construction-related traffic, including haul truck trips, materials delivery trips, concrete truck trips, and construction worker trips are very clearly described in Section 3.14, *Transportation* under Impact T-1. For example, as described therein, *"[c]onstruction activities associated with Phase 1 of the proposed Project would generate up to approximately 1,825 haul truck trips for export of demolished asphalt and excavated soil, and 2,000 haul truck trips for export of demolition debris. Additionally, construction of the RCFE Building would require approximately 1,237 truck trips for concrete delivery. Backfill of the Beach Cities Health Center basement would require approximately 875 truck trips for import of clean soil (refer to Section 2.5.1.3, Construction Activities). Construction activities associated with the Phase 2 development program would require approximately 1,660 trips associated with export of demolition debris and excavated soil and approximately 2,149 trips associated with concrete and steel deliveries (refer to Section 2.5.2.4, Construction Activities)."*

*Oral Comment SK-3*

The comment states that the Environmentally Superior Alternative, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, would provide less public serving uses. This issue is identified in the discussion describing the relationship of the alternative to the project objectives (refer to Section 5.5.4, *Alternative 4 – Phase 1 Preliminary Site Development Plan Only*). his comment does not address the adequacy of the EIR or the impact analysis and represents the

commenter's opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Healthy Living Campus Master Plan.

**Frank von Coelln**

*Oral Comment FVC-1*

The comment asks logistical questions about the format and content of the presentation of the next public meeting on the Draft Environmental Impact Report (EIR). These are not comments on the adequacy or technical sufficiency of the environmental impact analysis, mitigation measures, and/or alternatives presented in the EIR.

*Oral Comment FVC-2*

The comment expresses general opposition to the proposed Project and concerns about shade and shadows on neighboring residents. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to the shade and shadow analysis. Refer also to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

**Michael**

*Oral Comment M-1*

The comment requests that the comments on the Draft Environmental Impact Report (EIR) be released to the public. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration

*Oral Comment M-2*

The comment asserts that the No Project Alternative should have analyzed a scenario in which the Beach Cities Health District does nothing with the existing BCHD campus. For context, pursuant to California Quality Act (CEQA) Guidelines Section 15126.6(e)(1), *"[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project."* Pursuant to CEQA Guidelines Section 15126.6(e)(2), *"[t]he 'no project' analysis shall discuss the existing*

*conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."*

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing Center for Health and Fitness (CHF) would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is "*reasonably expected to occur in the foreseeable future"* clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District and substantially reducing public health service available to Beach Cities residents and even those of the South Bay. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of theses existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion of the Project site. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

**Ann Wolfson**

*Oral Comment AW1-1*

The comment expresses the commenter's opinion that the Draft Environmental Impact Report (EIR) presentation was cursory and that the answers should be provided to questions during the meeting. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration.

9.3.7.3 Saturday, April 17, 2021

**Susan Yano**

*Oral Comment SY2-1*

This comment asserts that the Beach Cities Health District (BCHD) property encroaches onto the City of Torrance property. This distinction regarding the City of Torrance right-of-way does not address the adequacy of the EIR or any physical environmental issues as required by CEQA.

*Oral Comment SY2-2*

As described in Section 5.0, *Alternatives*, the demolition activities described under the No Project Alternative may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of theses existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion of the Project site. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission. BCHD has the authority to acquire and transfer assets at fair market value pursuant to H&SC Division 23 Hospital Districts Sections 32000–32492 of the California Healthcare Code. For example, H&SC Section 32121 states, *"[e]xcept as provided in this section, by resolution, the board of directors of a local hospital district may authorize the disposition of any surplus property of the district at fair market value by any method determined appropriate by the board."*

*Oral Comment SY2-3*

The comment asks what are the financial uncertainties associated with Phase 2 and further requests a discussion of the full scop of financing for both Phase 1 and Phase 2. The comment also asks what would happen in the event of a budget overrun during construction. Refer to Master Response 6 – Financial Feasibility/Assurances as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to these issues.

*Oral Comment SY2-4*

The comment states, without substantial evidence or expert opinion, that the noise mitigation measures are not sufficient. The comment does not provide any additional suggested mitigation measures or otherwise describe how the mitigation measures are not sufficient. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to the noise analysis and associated mitigation measures.

*Oral Comment SY2-5*

The comment questions the definition of feasibility for the measures identified in Mitigation Measure (MM) NOI-1. As described in the response to Oral Comment F-3, Impact NOI-1 clearly identifies discusses issues related to the feasibility. As described therein:

> *"[t]he feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership…For Phase 1 and Phase 2 construction, the necessary noise barrier heights (i.e., up to 105 feet) at the edge of the BCHD development footprint are too great to allow only one- to three-sided barriers and the total building footprint is too large to construct a fully enclosed four-sided noise barrier. Further, the construction of the foundation and framing structure required to support a fully enclosed four-sided noise barrier would result in significant and unavoidable noise impacts to adjacent residential areas in Redondo Beach and West Torrance.*
>
> *A shorter noise barrier could be constructed at the edge of the sensitive receptors in West Torrance (and similarly in Redondo Beach). However, any such off-site construction of a noise barrier would require approval from the City of Torrance and/or the City of Redondo Beach, which cannot be assured. Additionally, while the construction of a 30-foot-tall noise barrier may be feasible along Flagler Lane and Flagler Alley, a 30-foot noise barrier along Beryl Street and North Prospect Avenue fronting residences may not be feasible."*

*Oral Comment SY2-6*

The comment identifies language within MM NOI-1 that states trucks should attempt to operate in the inner lane on designated haul routes. First, it should be noted that temporary construction-related trips would increase daytime noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). Noise contributions from these haul truck trips would be imperceptible (i.e., less than 3 dBA). As required by MM NOI-1 trucks should attempt to operate in the inner lane to further reduce roadway noise; however, this cannot be reasonably required depending on traffic conditions during hauling activities.

*Oral Comment SY2-7*

The comment states the notification requirements provided in MM NOI-1 are not meaningful and requests details regarding the telephone number for complaints. While noticing efforts would not reduce noise, they are routinely issued by local municipalities and other developers to increase awareness of construction activities. The notices will also be important for distributing the non-automated telephone number available for residents and employees to call to submit complaints

associated with construction noise. Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15097 a Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* to further define implementation responsibilities, monitoring, and reporting actions.

**Ann Wolfson**

*Oral Comment AW2-1*

The comment suggests that the illustrative designs do not accurately represent the Phase 2 development plan. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis as well as Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues.

*Oral Comment AW2-2*

The comment states that it is a red flag that the EIR identifies impacts that are less than significant with mitigation. Contrary to the commenters assertion, the identification of impacts that are less than significant is not a red flag. In fact, the California Environmental Quality Act (CEQA) requires public lead agencies to impose feasible mitigation measures as part of the approval of a project in order to substantially lessen or avoid the significant adverse effects of the project on the physical environment.

The comment goes on to identify Impact VIS-1 as an example of an impact that has been reduced to a less than significant level with the implementation of Mitigation Measure (MM) VIS-1. The comment states that this disregards the everyday view of adjacent residences. However, the comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2.

The impact to scenic views, which is the subject of the comment, would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane. MM VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

*Oral Comment AW2-3*

The comment states that missteps during construction could result in unintended impacts and references a nearby ruptured water main that was accidentally hit during drilling activities. However, pursuant to the requirements CEQA, the impact analysis focuses on reasonably foreseeable environmental impacts and does not engage in speculation or conjecture regarding unlikely or unforeseeable accidents.

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**Mark Nelson**

*Oral Comment MN2-1*

The comment reference a March 2021 Wall Street Journal article involving a civil settlement between Wood Environment & Infrastructure Solutions, Inc. (Wood) and Scottish prosecutors. Refer to Master Response 15 – Purpose of Public Review.

*Oral Comment MN2-2*

The comment states that all six of the project objectives lack foundational basis. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to these issues. Additionally, responses to Comments TRAO-1 through TRAO-10 also addresses the project objectives.

It should be noted that the Beach Cities Health District (BCHD) has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953

(Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

*Oral Comment MN2-3*

The comment asserts that the proposed Project is taller with more square footage than the 2019 Master Plan. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue. As described therein, in response to the community's concerns described above, BCHD revised the footprint of the Residential Care for the Elderly (RCFE) Building was further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

*Oral Comment MN2-4*

The comment claims, without substantial evidence, that this increase in height would shade public recreation areas as well as surrounding neighborhoods and roadways. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion of the shade and shadow analysis, which is supported by modeling of potential changes in shade and shadows performed by licensed architects.

The comment goes on to claim, again without substantial evidence, that the proposed Project would have a significant and unavoidable impact on Towers Elementary School. It is important to

note that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17).

**Brianna Egan**

*Oral Comment BE-1*

The comment states that the Beach Cities Health District (BHCD) should keep the community in mind as new services or plan are developed, particularly with things like the proposed Aquatic Center. This comment does address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should also be noted that BCHD strives to understand and incorporate community needs as new services are developed. This is accomplished through surveys and reporting efforts such as the Community Health Report (https://www.bchd.org/healthreport). With regard to the Aquatics Center, in an effort to further refine community needs, BCHD contracted with Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies. Ballard*King & Associates prepared an Aquatics Report, which includes a robust local survey involving 2,256 responses that focused on the types of aquatic programs respondents were interested.

*Oral Comment BE-2*

The comment requests that the EIR address the potential impacts of climate change and the environmental cost of demolishing buildings and constructing new buildings. These issues are addressed in detail in Section 3.5, *Energy* as well as Section 3.7, *Greenhouse Gas Emissions and Climate Change*. As described in Section 2.5.1.5, *Sustainability Features*, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). As described in the response to Comment TRAO-69, the design of the proposed RCFE Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

- Photovoltaic solar panels occupying approximately 25-50 percent of the roof area;
- Solar hot water system to reduce energy use;
- Energy efficient heating, ventilation, and air conditioning (HVAC) systems;
- Operable windows for natural ventilation;
- High-performance building envelope – including thermal insulation;
- Controlled natural lighting and lighting systems designed with occupancy sensors and dimmers to minimize energy use;
- Water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.); and
- Interior materials with low volatile organic compound (VOC) content;
- Plant palette comprised of species adapted to the climate of Southern California;
- High efficiency irrigation system; and
- Pervious paving to promote on-site stormwater infiltration.

The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; electric vehicle (EV) charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. The proposed Project would also implement a Transportation Demand Management (TDM) plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site and overall traffic on the surrounding street network. The TDM plan would include transit and carpool incentives for employees

The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification. LEED is a national certification system developed by the U.S. Green Building Council (USGBC) to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. The program promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

*Oral Comment BE-3*

The comment requests consideration of retrofitting existing structures rather than demolishing and reconstructing. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. However, under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or

strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

*Oral Comment BE-4*

The comment suggests that BCHD consider the possibility for community organizations to be able to rent rooms. Further the comment suggest that BCHD should consider native plans, drought-tolerant plants, and even fruit trees. This comment does address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should be noted that the perimeter of the BCHD campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Additionally, the proposed Project would upgrade the existing Demonstration Garden, which would feature demonstration vegetable garden plots, an orchard with citrus and other fruit trees, and a garden shed (refer to Section 2.5.1.1, *Proposed Uses*).

**Brian Wilson**

*Oral Comment BW-1*

These are not public comments on the EIR, but instead a request for clarification regarding the calculation of construction noise (e.g., a description of how to read Table 3.11-16 and Table 3.11-17).

**Tim Ozenne**

*Oral Comment TO-1*

The comment voices support to the previous oral comments provided by Ann Wolfson. Refer to the responses to Oral Comment AW-1 through AW-3.

*Oral Comment TO-2*

The comment states that the Residential Care for the Elderly (RCFE) Building would reach a height of 130 feet over Flagler Lane and requests a photosimulation on the north end of Tomlee Avenue. Refer to the response to Comment TRAO-20 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

# 10.0 CORRECTIONS AND ADDITIONS

As required by California Environmental Quality Act (CEQA) Guidelines Section 15088, this section provides a summary of corrections or clarifications to the Draft Environmental Impact Report (EIR). None of the corrections and additions constitutes significant new information or substantial project changes as defined by CEQA Guidelines Section 15088.5. Meaningful corrections and additions to the Draft EIR are provided below in ~~strikeout~~ and underline, as needed, to indicate an addition or deletion, respectively. A number of minor grammatical or typographical errors have been revised and administrative changes have been made following the publication of the Draft EIR, and are not listed below in this section; however, all changes are presented throughout the Final EIR document in strikeout and underline format.

New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponent has declined to implement. The minor clarifying revisions described below would not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible project alternative or mitigation measure that would clearly reduce the significant environmental impacts. These clarifications ensure internal consistency within the EIR and would not substantially change any of its conclusions. Therefore, pursuant to CEQA Guidelines Section 15088.5, the Beach Cities Health District (BCHD) is not required to recirculate the Draft EIR.

## EXECUTIVE SUMMARY

Page ES-4, the Notice of Preparation/Scoping discussion has been revised to include the following:

BCHD also held scoping meetings for involved public agencies to solicit input and feedback from relevant public agencies.

Pages ES-12 through ES-15, Table ES-1 has been revised to reflect the updated MM CUL-1a, MM CUL-1b, and MM CUL-2 have, which were revised based on additional communication provided by the Gabrieleño Band of Mission Indians-Kizh Nation on March 11, 2021:

**MM CUL-1a Native American Monitoring~~Cultural Resources Monitoring Plan~~.** Prior to the commencement of any ground disturbing activities at the Project site, the Beach Cities Health District (BCHD) shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. The Native American Monitor shall only be present on-site during the construction phases that involve ground-disturbing activities, defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removal,

boring, grading, excavation, drilling, and trenching, within the Project site. The Native American Monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Native American Monitor and Tribal Representatives have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (i.e., not less than the surrounding 100 feet) until the find can be assessed. All archaeological resources unearthed by ground disturbing activities shall be evaluated by the Native American Monitor. If the archaeological resources are Native American in origin, the Consulting Tribe shall retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the County coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (California Environmental Quality Act [CEQA] Guidelines Section 15064.5[f])~~Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan shall be developed by a qualified archaeologist, with provisions for review and input by representatives of the Native American tribe(s) that consulted on the project pursuant to Assembly Bill (AB) 52. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist and Native American tribal monitor shall be required during ground disturbing activities – including (but not limited to) clearing/grubbing, excavations, grading, and trenching – during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist and Native American tribal monitor. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial~~

~~goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary~~.

**MM CUL-1b Archaeological Monitoring.** Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan shall be developed by a qualified archaeologist. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist shall be required during ground disturbing activities during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary.

**MM CUL-2 Inadvertent Discoveries.** A qualified archaeologist shall be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than 100 feet from the find. The treatment of the archaeological resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to

accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

Page ES-17 and ES-18, Table ES-1 has been updated to reflect MM GEO-1, which has been revised to further clarify responsibilities associated with the mitigation measure:

**MM GEO-1 Geotechnical Report Recommendations.** The proposed Project shall comply with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the proposed Project. The Beach Cities Health District (BCHD) shall incorporate these recommendations into all final grading plans, design drawings, and construction plans, as appropriate, prior to the issuance of any demolition or grading permits and shall submit the appropriate plans to ~~These recommendations shall be reviewed by the~~ City of Redondo Beach and the City of Torrance Building & Safety Divisions ~~and formalized on all final grading plans, design drawings, and construction plans, as appropriate,~~ prior to the issuance of any demolition or grading permits. City of Redondo Beach and City of Torrance permit compliance staff shall review all final grading plans, design drawings, and construction plans, as appropriate, and observe and earthwork and grading to ensure compliance with these recommendations and specifications ~~during grading and construction activities associated with the proposed Project~~.

Page ES-18 and ES-19, Table ES-1 has been updated to reflect MM GEO-2a, has been revised to further clarify timing associated with the mitigation measure:

**MM GEO-2a Worker Paleontological Resource Awareness Session.** In order to educate construction contractors regarding the protection of any paleontological resources that are unexpectedly discovered during excavations associated with the proposed Project,~~.~~ The Beach Cities Health District (BCHD) shall retain a qualified paleontologist to develop a worker awareness program to educate all workers regarding the paleontological resources that, while unlikely, may occur on the development site as well as appropriate procedures to enact should paleontological resources be discovered during development. The qualified paleontologist shall develop appropriate training materials including, but not limited to, a summary of geologic units present at the Project site by depth, a description of potential paleontological resources that may be encountered during the proposed excavations, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to the initiation of excavation and grading activities or prior to the start of work onsite for new workers hired after the initial awareness session. BCHD shall provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested.

Page ES-26, Table ES-1 has been updated to reflect MM HAZ-2c, which has been revised to clarify that PCE is tetrachloroethylene rather than trichloroethylene:

**MM HAZ-2c Soil Vapor Extraction (SVE) Equipment. Use** of an SVE vacuum blower (e.g., regenerative blowers, rotary lobe blowers, rotary claw blowers, centrifugal fan blowers, etc.) shall be implemented during construction within confined spaces, as necessary, to maintain Occupational Safety and Health Administration (OSHA) exposure limits or ~~trichloroethylene~~ tetrachloroethylene (PCE) and other volatile organic compounds (VOCs).

Page 3.14-65 through -67, MM T-2 has been revised to make the following clarifications:

**MM T-2 Construction Traffic and Access Management Plan** Following preparation of the final design plan for Phase 1 of the proposed Project, the Beach Cities Health District (BCHD) shall expand upon the Construction Traffic Control Plan and prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be subject to review and approval by ~~BCHD,~~ the California Department of Transportation (Caltrans), County Department of Transportation (DOT), ~~and~~ Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department prior to issuance of a Conditional Use Permit (CUP). The Construction Traffic and Access Management Plan shall be designed to:

- ~~Construction crew parking.~~ On-site construction crew parking to the maximum extent feasible; and
- Prohibition of crew parking in adjacent residential neighborhoods.
- Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed contingent upon the issuance of an after-hours construction permit from the Redondo Beach Public Works Department Engineering Division and Torrance Community Development Department.
- BCHD shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, Redondo Beach Fire Department [RBFD], Redondo Beach Police Department [RBPD], Torrance Fire Department [TFD], Torrance Police Department [TPD], Public Works Department, and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet prior to the implementation of Phase 1 and Phase 2 of the proposed Project.
- BCHD shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks or longer per each submittal.

Page ES-49, Table ES-2 has been revised to include comparison of Alternative 6.

## 1.0 INTRODUCTION

1.4 Public Review and Comments

Page 1-4 has been revised to describe the location of the comments received on the Draft EIR as well as the written responses to comments:

~~Following the public review period, a Final EIR will be prepared.~~ The Final EIR was prepared following the public review period and ~~will include~~ includes responses to all written and oral comments received during the public review period. See Appendix N for the complete compiled record of the written and oral comments received on the Draft EIR and see Section 9.0, *Responses to Comments on the Draft EIR* for written responses to each of these comments as required by CEQA Guidelines Section 15088.

1.5 Required Approvals

Page 1-5 and 1-6 have been revised as follows to clarify the required approvals:

- Conditional Use Permit for Phase 1 preliminary site development Plan and Phase 2 development program under the proposed Project pursuant to RBMC Section 10-2.2506 within the P-CF and C-2 zones (Redondo Beach Planning Commission);
- Community Development Department approval for shared parking pursuant to RMBC Section 10-2.1706 (Redondo Beach ~~Building & Safety~~Planning Division);
- Transportation permit for transportation of heavy construction equipment on State highways (California Department of Transportation [Caltrans]).

## 2.0 PROJECT DESCRIPTION

Section 2.2.2 Surrounding Land Uses

Page 2-8, has been revised to clarify the zoning with the single family residential neighborhood to the east within the City of Torrance:

Additionally, the Project site is bordered by single-family residences to the east across Flagler Lane and Flagler Alley, in an area zoned ~~R-LO (Low Density Residential)~~ R-H/R-1 (Hillside and Local Coastal Overlay Zone [Hillside Overlay]/Single Family Residential District) by the City of Torrance (refer to Figure 2-2).

Section 2.2.5 Existing Land Use Designations and Zoning

Page 2-17 has been revised to clarify that the proposed Project would adhere to the Floor Area Ratio Requirements within the C-2 zone:

Development standards in the C-2 zone allow for a baseline maximum building height of 30 feet. Development standards in the C-2 zone also require that the maximum density or intensity of development adheres to a Floor Area Ratio (FAR) of 0.5. As described further in Section 3.10, *Land Use and Planning* the proposed development within the C-2 zone has been designed to meet these requirements. The RBMC does not specify building heights or FARs for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116).

Section 2.6.1.1 Proposed Uses

Page 2-31 has been revised as follows to clarify that the WAVE shuttles are only available to residents of the City of Redondo Beach and the City of Hermosa Beach:

PACE would also make use of Los Angeles County Access and/or WAVE shuttles – to the extent that they are available to residents of the City of Redondo Beach and the City of Hermosa Beach – to provide transportation for participants.

Section 2.6.1.3 Proposed Access, Circulation, and Parking

Page 2-36 has been revised as follows to clarify that the Emergency Access Plan would also be coordinated with the Torrance Fire Department (TFD) and the Torrance Police Department (TPD):

Prior to operation, BCHD would coordinate with the Redondo Beach Fire Department (RBFD) and the Redondo Beach Police Department (RBPD) as well as the Torrance Fire Department (TFD) and Torrance Police Department (TPD) to prepare an Emergency Response Plan for the campus.

Section 2.6.1.6 Construction Activities

Page 2-41 and Figure 2-9 have been revised to be consistent with the CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element:

Construction trucks would access the site from one of the existing driveways along North Prospect Avenue. Consistent with the CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element ~~Haul~~ haul trucks would exit the Interstate (I-) 405 freeway on 190th Street or Hawthorne Avenue to 190th Street and reach the site using Del Amo Street to North Prospect Avenue. Construction entry to the Project site would be provided along North Prospect Avenue where construction flaggers would be stationed to direct construction traffic and maintain public safety.

Additionally, Page 2-44 has been revised as follows to clarify that the TFD and TPD would have access to the Project site during construction:

Additionally, emergency services vehicle access points would be maintained at North Prospect Avenue and Beryl Street. Fire lanes would be maintained at all times during construction work. The ~~RBPD and RBFD~~ RBFD, RBPD, TFD, and TPD would also have access to the Project site 24 hours per day via fence-mounted lockboxes to open gates securing the Project site.

Section 2.6.2.4 Construction Activities

Page 2-56 has been revised to clarify required approvals from the City of Torrance:

Approvals from the City of Torrance may also be required for new improvements required within the City of Torrance right-of-way (e.g., utility infrastructure improvements as well as the proposed curb cut, grading and the construction of retaining walls for the service area and loading dock entry/exit in accordance with TMC Section 92.13.12[d]).

Additionally, Page 2-57 has been revised to clarify that the TFD and TPD would have access to the Project site during construction:

Additionally, emergency services vehicle access points would be maintained at North Prospect Avenue and Beryl Street. Fire lanes would be maintained at all times during construction work. The ~~RBPD and RBFD~~ RBFD, RBPD, TFD, and TPD would also have access to the Project site 24 hours per day via fence-mounted lockboxes to open gates securing the Project site.

## 3.0 ENVIRONMENTAL IMPACT ANALYSIS AND MITIGATION MEASURES

Section 3.0.2 Cumulative Impacts

Table 3.0-1 and Figure 3.0-1 have been revised to include the following cumulative project:

| Map Key | Project Name | Project Type | Address | Description | Status |
|---|---|---|---|---|---|
| **13** | PCH Roadway, Signal, and Pedestrian Improvements | Infrastructure | All of PCH in the South Bay | Resurface asphalt roadway, upgrade signal systems, and implement Americans with Disabilities Act (ADA) improvements | Construction scheduled for FY 2022-2024 |

## 3.1 AESTHETICS AND VISUAL RESOURCES

Section 3.1.1 Environmental Setting

Page 3.1-4 has been revised to describe the uses adjacent to Flagler Lane:

These buildings vary in scale, ranging from 1 to 4 stories. Between Beryl Street and Towers Street, Flagler Lane supports single-family residences within the City of Torrance adjacent to the east of the Project site. Adjacent to the north of the Project site, Flagler Lane supports medium-density multi-family residential buildings to the west and Dominguez Park to the east.

Page 3.1-6 has been revised to describe the uses along Diamond Street:

To the southeast, the Project site is bounded by Diamond Street. Northeast of North Prospect Avenue, Diamond Street is a two-lane cul-de-sac with center median divider providing access to six single-family residences. Views of the Project site from the residences along the Diamond Street cul-de-sac – namely the medical office buildings located at 510 North Prospect Building and 512 North Prospect Building – are largely obstructed by existing trees and vegetation along the Project sites southeastern slope. Southwest of North Prospect Avenue, Diamond Street is~~,~~ a three-lane roadway with one lane in each direction and a center left-turn lane. Diamond Street includes approximately 5-foot-wide pedestrian sidewalks lined with mature eucalyptus (*Eucalyptus* spp.) and palm trees. Diamond Street supports single-family residential, low-density multi-family residential, and ~~several schools, including the Redondo Beach Learning Academy, Redondo Union High School, and Redondo Beach High School~~Redondo Union High School. Due to the rolling topography and large street trees, intermittent views of the open sky and Pacific Ocean are visible from Diamond Street southwest of North Prospect Avenue.

Additionally, Page 3.1-7 has been revised to clarify that there is only one multi-family residential building along Beryl Street:

Taller buildings near the Project include a 4-story multi-family residential ~~buildings~~building between Beryl Street and Agate Street. ~~These structures~~This structure generally extends up to 52 feet in height. Additionally, street trees along Beryl Street and Flagler Lane/Flagler Alley and the developed hilly topography add to the visual character of the vicinity and can partially obstruct views of the Project site from the residential units in these surrounding neighborhoods.

Page 3.1-9 has been revised to describe views of the BCHD campus from Sunnyglen Park:

Public views of the Project site are generally confined to those available from immediately adjacent streets, sidewalks, and Dominguez Park. Views from streets even one block away are obscured by intervening structures. For example, ~~views from Sunnyglen Park are completely blocked by intervening 1- to 2-story single family residences and neighborhood serving commercial development~~views of the existing campus from Sunnyglen Park are partially or completely blocked in some locations (e.g., at the northwest corner of the park) by intervening 1- to 2-story single family residences and neighborhood serving commercial development. Views of the

existing buildings and surface parking lots on-site from North Prospect Avenue, Beryl Street, Dominguez Park, Flagler Lane, and Diamond Street are generally uninterrupted and only sometimes partially obscured by street trees, other landscaping, utility infrastructure (e.g., wooden poles and electrical lines), and traveling cars.

Page 3.1-19 has been revised to more specifically identify shadow-sensitive receptors within the City of Torrance:

The nearest solar collectors to the Project site are the small solar panels atop a few residences in the Torrance neighborhood, located to the east as near as approximately 200 feet from the Project site, and in the Redondo Beach neighborhood to the southwest, approximately 475 feet from the Project site.

Section 3.1.2 Existing Regulatory Setting

Page 3.1-21 has been revised to include Goal 1K, Objective 1.46, and Objective 1.53 of the Redondo Beach General Plan Land Use Element:

> Goal 1K: Provide for public uses which support the needs and functions of the residents and businesses of the City.
>
> Objective 1.46: Provide for the continuation of existing and expansion of governmental administrative and capital, recreation, public safety, human service, cultural and educational, infrastructure, and other public land uses and facilities to support the existing and future population and development of the City.
>
> Objective 1.53: Attain residential, commercial, industrial and public buildings and sites which convey a high-quality visual image and character.

Page 3.1-22 and 3.1-23 as well as the impact analysis provided in Table 3.1-2 has been revised to remove reference to the Redondo Beach General Plan Parks and Recreation Element

~~*Redondo Beach General Plan Parks and Recreation Element*~~

~~The Redondo Beach General Plan Parks and Recreation Element sets forth policies and implementation measures to enhance the unique characteristics of the City and its coastline. Such policies support ongoing maintenance and facilitate expansion and improvement of parkland, recreational facilities, and programs.~~

> ~~Policy 8.2a.8 Preserve and enhance unique and valuable community resources as part of the planning and development of parks and recreation~~

~~areas. Such resources include significant scenic and visual resources; cultural/historic resources; and natural resources such as water features, wildlife habitats, and native vegetation.~~

Page 3.1-23 and 3.1-24 have been revised to correctly reference Redondo Beach Municipal Code RBMC 10-2 instead of RBMC 10-5:

- Section 10-~~5~~2.1530
- Section 10-~~5~~2.1706(c)(10)(c)
- Section ~~10-5.1900(b)(2)(g)~~10-2.1900(b)(2)(g)
- Section ~~10-5.1900(c)(3)(f)~~10-2.1900(d)

Page 3.1-26 through 3.1-27 have been revised to provide administrative corrections and additions to Torrance General Plan Community Resources Element objectives and policies:

Policy CR.~~2.1~~1.2 Require the provision of on-site open space in new developments.

Objective CR.4: To ~~preserve scenic vistas wherever possible~~create and maintain open space as an aesthetic enhancement within the urban environment.

Policy CR.4.3 Encourage planting of new trees, and preserve existing street trees in residential neighborhoods.

Objective CR.19: To ~~create and maintain open space as an aesthetic enhancement within the urban environment~~preserve scenic vistas wherever possible.

Page 3.1-27 has been revised as follows to add TMC Section 92.30.2:

The Torrance Municipal Code (TMC) addresses outside equipment and lighting:

Section 92.30.2: All roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls of any building shall be completely screened from public view with materials compatible with the main buildings on the subject property. Such equipment or screening material shall be constructed in such a manner that noises emanating from the roof or wall appurtenances shall not be audible beyond the property lines of the subject property.

Section 3.1.3 Impact Assessment and Methodology

Page 3.11-33 has been revised to describe the methodology for calculating shade and shadows associated with the proposed Project:

Shade and shadow simulations were prepared for the proposed Project using a computer-generated 3D model to identify the height and bulk of proposed building elements, mapping the *"footprint"* (i.e., location, shape, and size) of the Project site, and then calculating and diagramming the shadows that would be cast by the building components during the most extreme, or conservative, conditions given the existing topography and the surrounding development. (see Appendix M). The Project site was modeled using the survey provided by DENN Engineers while the surrounding neighborhood was generated using data from the OpenStreetMap library. These two sources provided the most accurate representation of the site while capturing the wider context to depict how the proposed construction would affect the surrounding neighborhood. The shade and shadow studies were generated in Autodesk Revit 2020 sun lighting utilizing geocoordinates for accuracy.

Section 3.1.4 Project Impacts and Mitigation Measures

Page 3.1-33, Impact VIS-1 has been revised to better clarify that the intersection of 190th Street & Flagler Lane is not the high point along 190th Street. Representative View 6 was selected because it provides a relatively unobstructed distant panoramic view of the Palos Verdes ridgeline.

**VIS-1** **The proposed Residential Care for the Elderly (RCFE) Building included in the Phase 1 preliminary development plan would interrupt public view of the Palos Verdes hills from ~~the highpoint at~~ the intersection of 190th Street ~~and~~ & Flagler Lane. However, a reduction in the height of the building would reduce this impact to *less than significant with mitigation*.**

Page 3.1-37 has been revised to correctly describe that the Providence Little Company of Mary Medical Institute Building is 3 stories tall.

As previously described, the existing views of the Project site from this location include the prominent 5-story Beach Cities Health Center and the ~~4~~3-story Providence Little Company of Mary Medical Institute Building, with white building façades and dark tinted windows that form horizontal strips across the buildings.

Page 3.1-39, MM VIS-1, was revised to describe that the reduction in building height could also be achieved with a reduction in the floor-to-ceiling height:

***MM VIS-1*** ***Reduced Residential Care for the Elderly (RCFE) Building Height.*** *The final design of the Phase 1 preliminary site development plan shall be revised to reduce the maximum height of the RCFE Building in order to avoid interruption of the ridgeline of the Palos Verdes hills as viewed from the intersection of 190th Street & Flagler Lane. This revision to the final design could include a reduction in the floor-to-ceiling height, ~~the~~ removal of the uppermost stories of the building, and/or recessing the building foundation further into the ground surface. The reduced building height shall be formalized on all final building plans and construction plans, as appropriate, prior to the issuance of any demolition, grading, or building permits by the Redondo Beach Building & Safety Division. City of Redondo Beach permit compliance staff shall observe and ensure compliance with these specifications during construction activities associated with the proposed Project.*

Additionally, Page 3.1-39 has been revised to describe that the reduction in the height of the RCFE Building required by MM VIS-1 would also further reduce already less than significant shade and shadow impacts:

Therefore, the wide-ranging panoramic views of the Palos Verdes ridgeline from Representative View 6 would remain uninterrupted, and this visual impact would be reduced to *less than significant*. Additionally, the height reduction would further reduce the length of shadows cast onto the adjacent properties, as described in Impact VIS-4.

Page 3.1-40 and Page 3.1-56, Impact VIS-2 has been revised to describe that the proposed Project would now meet the FAR requirement for C-2 zones:

~~This portion of the proposed RCFE Building would exceed the 0.5 FAR requirement; however, Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located, subject to Planning Commission Design Review and issuance of a CUP.~~

Page 3.1-46, Impact VIS-2 as well as the consistency analysis for Policy CR.3.8 within Table 3.1-3 has been revised to describe that the proposed Project would include rooftop garden:

Further, views of the landscaped ~~open air dining terrace~~rooftop garden atop the first floor of the RCFE Building would create a more pedestrian friendly environment along Beryl Street by inviting visitors to the campus.

Page 3.1-71, Impact VIS-3, has been revised to correct a reference to the shadow length multipliers:

For example, according to the accepted shadow length multipliers for the City of Los Angeles, a ~~121.5~~100-foot-tall building would create morning and afternoon shadows that would reach approximately ~~404.5~~ 303 feet in length during the Winter Solstice; the same building would create shadows that would reach approximately ~~291~~ 218 feet at the same times during the Summer Solstice (City of Los Angeles 2006).

Page 3.1-72, Impact VIS-3, has been revised to describe the additional reduction in shade and shadows associated with the implementation of MM VIS-1:

Implementation of MM VIS-1, which would reduce the height of the proposed RCFE Building, would also reduce shadows cast by the proposed RCFE Building onto adjacent uses, further reducing the already less than significant for shade and shadow impacts associated with the Phase 1 preliminary site development plan.

### 3.2 AIR QUALITY

Page 3.2.4 Project Impacts and Mitigation Measures

Page 3.2-40, MM AQ-1, has been revised to insert the following:

> *Construction contractors shall ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD shall demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction.*

Page 3.2-53, Impact AQ-5, has been revised as follows to correctly describe seven intersection s that would operate at Level of Service (LOS) E or F:

~~Five~~Seven intersections are projected to operate at LOS E or F during one or both peak periods under future operational year (2032) plus Project conditions (see Appendix J). These intersections are:

- Flagler Lane & 190th Street (AM and PM peak hour);
- Inglewood Avenue & 190th Street (PM peak hour);
- Harkness Lane & Beryl Street (AM and PM peak hour);

- Flagler Lane & Beryl Street (AM and PM peak hour);
- Redbeam Avenue & Del Amo Boulevard (AM and PM peak hour);
- Anza Avenue & Del Amo Boulevard (PM peak hour); and
- Hawthorne Boulevard & Del Amo Boulevard (AM and PM peak hour).

### 3.3 BIOLOGICAL RESOURCES

Page 3.3.2 Regulatory Setting

Page 3.3-13 and Page 3.3-14 has been revised to correctly reference RBMC Section 10-2.1900:

Redondo Beach Municipal Code (RBMC) Section 10-~~5~~2.1900 aims to establish standards for installation of landscaping in order to enhance the aesthetic appearance of properties within the City, ensure the quality, quantity, and appropriateness of landscape materials, effect a functional and attractive design, improve compatibility between land uses, conserve water, control soil erosion, and preserve the character of existing neighborhoods. Landscaping plans of projects within the City shall comply with the following criteria:

- **Plant Location.** All required setbacks shall be landscaped with live plants except for walkways, driveways, parking areas and patio areas. Non-organic groundcover shall not be used in place of plant material in planter areas unless utilized as a decorative accent.
- **Plant size.** Plants shall be sized and spaced to achieve immediate effect and shall normally not be less than a 15-gallon container for trees, 5-gallon container for shrubs, and a one-gallon container for mass planting. Groundcover coverage must be 100 percent in one year, with rooted cuttings from flats planted no more than 12 inches on center, and containerized woody, shrub ground cover planted no more than 3 feet on center. Landscape plans shall incorporate existing mature trees with trunk diameters of 6 inches or greater that are compatible with the proposed grades, structures and hardscape. Specimen trees, 36-inch box, or larger may be used to replace an existing mature tree that cannot feasibly be saved.
- ~~**Landscape plans.** Landscape plans shall incorporate existing mature trees with trunk diameters of 6 inches or greater that are compatible with the proposed grades, structures, and hardscape. Specimen trees, 36-inch box, or larger may be used to replace an existing mature tree that cannot feasibly be saved.~~
- ~~**Parking lots.** New surface parking lots containing 10 or more parking spaces shall provide a minimum of one shade tree for every 6 spaces. The Planning Commission may also~~

~~require provision of trees and other landscaping in parking lots in conjunction with any project subject to Planning Commission Design Review.~~

- ~~**Landscape and irrigation plans required, for projects other than single-family developments.** A landscape plan and irrigation plan drawn to scale and dimensioned shall be submitted to the Planning Division for all new projects in all nonresidential zones, and for all new residential projects of two or more units. A landscape plan and irrigation plan may be required in conjunction with other projects requiring Administrative Design Review, Planning Commission Review, Conditional Use Permit, or Variance.~~
- **Planting Areas.** All planting areas shall be served by a permanent underground clock-operated water-efficient irrigation system. A drip irrigation system or other water conserving irrigation system may be required where feasible. All sloped planting areas abutting hardscape shall be surrounded with a minimum 6 inch high concrete curb where necessary to prevent erosion.
- **Parking Lots.** New surface parking lots containing 10 or more parking spaces shall provide a minimum of one shade tree for every 6 spaces. The Planning Commission may also require provision of trees and other landscaping in parking lots in conjunction with any project subject to Planning Commission Design Review.

### 3.4 CULTURAL RESOURCES

Page 3.4-1 and various other locations within Section 3.4, *Cultural Resources and Tribal Cultural Resources* has been revised to correctly reference the Redondo Beach Preservation Ordinance (Ord. No. 2554) (1989):

This analysis is also based on the findings of an archaeological literature and records search prepared by Wood archaeologists as well as the information from the Redondo Beach ~~Historic~~ Preservation Ordinance (Ord. No. 2554) (1989), Historic Resources Surveys conducted by the City of Redondo Beach (1986 and 1996), Torrance General Plan Community Resources Element (2010), and Torrance Historic Preservation Ordinance (Ord. No. 3822) (2017).

Section 3.4.1 Existing Setting

Page 3.4-8 has been revised to more clearly describe the status of the existing medical office buildings on the campus.

However, for all the reasons described for the former South Bay Hospital Building these two medical office buildings have not been ~~determined by the Redondo Beach Preservation Commission to be very exceptional~~identified in the City's Historic Resource Survey and do not

meet the criteria outlined in the City of Redondo Preservation Ordinance (Ord. No. 2554) for designation as a Redondo Beach Landmark.

Page 3.4-10, Table 3.4-1, has been revised to clarify the list of Historic Architectural Resources within a 0.5-mile radius of the Project site.

| Name | Address | Proximity to Project Site | Status |
|---|---|---|---|
| Morrell House at Dominguez Park | 298 Flagler Lane | 650 feet north | Local Landmark |
| Queen Anne House at Dominguez Park | 302 Flagler Lane | 750 feet north | Local Landmark |
| ~~Hibbard House/~~ Original Townsite Historic District | ~~328~~ N. Gertruda Avenue N. Guadalupe Avenue Carnelian Street | 0.43 miles southwest | Listed in NRHP |
| Gertruda Avenue Historic District | N. Gertruda Avenue | 0.5 miles southwest | Listed in NRHP |
| - | 820 Beryl Street | 0.23 miles southwest | Locally Significant* |

Note: The City of Torrance has surveyed hundreds of historic resources within its Olmsted Tract (also referred to as the Torrance Tract or Old Torrance Tract), an area of the City originally planned by Fredrick Law Olmsted Jr. and includes a number of buildings designed by the noted Southern California Architect Irving Gill (Page and Turnbull 2018). The Olmsted Tract and its contents are located in the eastern area of the City and not in proximity to the proposed Project site.
*The property located at 820 Beryl Street was determined to be a potentially historic resource within the City of Redondo Beach's Historic Resource Survey; however, this property has not been designated as a Local Landmark.
Sources: City of Redondo Beach 2019a; 2019b.

Page 3.4-26, MM CUL-1a, MM CUL-1b, and MM CUL-2 have been revised based on additional communication provided by the Gabrieleño Band of Mission Indians-Kizh Nation on March 11, 2021.

***MM CUL-1a*** ***Native American Monitoring.*** *Prior to the commencement of any ground disturbing activities at the Project site, the Beach Cities Health District (BCHD) shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. The Native American Monitor shall only be present on-site during the construction phases that involve ground-disturbing activities, defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, within the Project site. The Native American Monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Native American Monitor and Tribal Representatives have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.*

*Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (i.e., not less than the surrounding 100 feet) until the find can be assessed. All archaeological resources unearthed by ground disturbing activities shall be evaluated by the Native American Monitor. If the archaeological resources are Native American in origin, the Consulting Tribe shall retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.*

*If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the County coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5. Human remains and grave/burial goods shall be treated alike per Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (California Environmental Quality Act [CEQA] Guidelines Section 15064.5[f]).*

***MM CUL-1b*** ***~~Cultural Resources Monitoring Plan~~Archaeological Monitoring.*** *Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan shall be developed by a qualified archaeologist~~, with provisions for review and input by representatives of the Native American tribe(s) that consulted on the project pursuant to Assembly Bill (AB) 52~~. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist ~~and Native American tribal monitor~~ shall be required during ground disturbing activities ~~including (but not limited to) clearing/grubbing, excavations, grading, and trenching~~ during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist~~ and Native American tribal monitor~~. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of*

*Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary.*

***MM CUL-2*** ***Inadvertent Discoveries.*** *A qualified ~~professional~~ archaeologist ~~and approved Native American monitor~~ shall be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological ~~and/or tribal~~resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than ~~50~~ 100 feet from the find. ~~The qualified archaeologist and/or Native American monitor shall evaluate the significance of the discovery based on the Treatment Plan prior to resuming any activities that could impact the discovery. All tribal cultural resources unearthed by ground disturbing activities shall be evaluated by the Native American monitor. Any required testing or data recovery shall be directed by the qualified archaeologist and Native American monitor pursuant to the Treatment Plan.~~The treatment of the archaeological resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.*

## 3.5 ENERGY

Section 3.5.1 Existing Setting

Page 3.5-3 has been revised to provide minor clarifications to existing electricity demand on the campus:

The estimated electricity demand for the operation of the existing residential, medical office, office, health and fitness, and community services uses at the existing BCHD campus is approximately 2,378,070 kWh per year, ~~far~~ less than 0.~~1~~5 percent of total electricity demand in Redondo Beach (see Table 3.5-2; see Appendix E).

Page 3.5-5 has been revised to provide minor clarifications to existing natural gas demand on the campus:

The estimated natural gas demand for operation of the existing residential, medical office, office, health and fitness, and community services uses at the existing campus is 2,252,693 thousand British thermal units (kBTU) (approximately 22,532 therms) per year, approximately 0.14 percent ~~far~~ less than ~~0.1 percent of~~ total ~~electricity~~ natural gas demand in Redondo Beach (see Table 3.5-4; see Appendix E).

Section 3.5.2 Regulatory Setting

Page 3.5-8 and 3.5-9 have been revised to reference the recently adopted Connect SoCal:

~~The 2016-2040 RTP/SCS, adopted on April 7, 2016, integrates land use and transportation strategies to achieve required emission reductions consistent with Senate Bill (SB) 375 of 8 percent by 2020 and 13 percent by 2035 relative to the base year of 2005.~~ On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt the 2020-2045 RTP/SCS (Connect SoCal) (SCAG 2020). The 2020-2045 RTP/SCS includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections. The intent of the plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal plan achieves per capita GHG emissions reductions relative to 2005 of 19 percent in 2035 (SCAG 2020).

## 3.6 GEOLOGY AND SOILS

Section 3.6.1 Existing Setting

Page 3.6-9 and various other locations in Section 3.6, *Geology and Soils* have been updated to reference the recently adopted Redondo Beach Local Hazard Mitigation Plan:

The Redondo Beach ~~Draft~~ Local Hazard Mitigation Plan, adopted in 2020, identifies the Providence Family Medical Center and the Beach Cities Health Center on the campus as critical facilities (City of Redondo Beach ~~2019~~2020).

Section 3.6.4 Project Impacts and Mitigation Measures

Page 3.6-25, MM GEO-1 has been revised to further clarify responsibilities associated with the mitigation measure:

***MM GEO-1*** ***Geotechnical Report Recommendations.*** *The proposed Project shall comply with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the proposed Project. ~~These recommendations shall be reviewed by~~ The Beach Cities Health District (BCHD) shall incorporate these recommendations into all final grading plans, design drawings, and construction plans, as appropriate, prior to the issuance of any demolition or grading permits and shall submit the appropriate plans to the City of Redondo Beach and the City of Torrance Building & Safety Divisions ~~and formalized on all final grading plans, design drawings, and construction plans, as appropriate,~~ prior to the issuance of any demolition or grading permits. City of Redondo Beach and City of Torrance permit compliance staff shall review all final grading plans, design drawings, and construction plans, as appropriate, and observe earthwork and grading to ensure compliance with these recommendations and specifications ~~during grading and construction activities associated with the proposed Project~~.*

Page 3.6-30, MM GEO-2a has been revised to further clarify timing associated with the mitigation measure:

***MM GEO-2a*** ***Worker Paleontological Resource Awareness Session.*** *In order to educate construction contractors regarding the protection of any paleontological resources that are unexpectedly discovered during excavations associated with the proposed Project, ~~-~~ Beach Cities Health District (BCHD) shall retain a qualified paleontologist to develop a worker awareness program to educate all workers regarding the paleontological resources that, while unlikely, may occur on the development site as well as appropriate procedures to enact should paleontological resources be discovered during development. The qualified paleontologist shall develop appropriate training materials including, but not limited to, a summary of geologic units present at the Project site by depth, a description of potential*

*paleontological resources that may be encountered during the proposed excavations, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to the initiation of excavation and grading activities or prior to the start of work on-site for new workers hired after the initial awareness session. BCHD shall provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested.*

## 3.7 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Section 3.7.2 Regulatory Setting

Page 3.7-16 was updated to add the following policy of the Redondo Beach General Plan Transportation Element:

Policy 16 Encourage flex hours in work environments.

## 3.8 HAZARDS AND HAZARDOUS MATERIALS

Section 3.8.2 Regulatory Setting

Page 3.8-19 has been updated to include a description of the City of Redondo Beach Local Hazard Mitigation Plan:

*City of Redondo Beach Local Hazard Mitigation Plan (~~City of Redondo Beach~~ 2020)*

The City of Redondo Beach developed the 2020 Local Hazard Mitigation Plan to broadly increase resiliency in Redondo Beach through six key goals:

- Encourage resiliency within City plans and processes to reduce threats to life and property.
- Maintain basic local government operations and services during and following a hazard event.
- Sustain public outreach and education of hazard risks and proper mitigation activities.
- Improve interdepartmental and interjurisdictional partnerships for greater cooperation.
- Foster a culture of respect and protection for natural systems and the local environment.
- Enhance post-disaster response capacity through civic leadership of local businesses, community organizations, and city residents.

The Local Hazard Mitigation Plan was designed be consistent with California Office of Emergency Services (Cal OES) and Federal Emergency Management Agency (FEMA) requirements.

Following review and approval of the plan by Cal OES and FEMA, the City of Redondo Beach adopted the Local Hazard Mitigation Plan in July 2020, by resolution of the City Council. The Redondo Beach Local Hazard Mitigation Plan is both a reference document and an action plan. It has information and resources to educate readers and decision makers about hazard events and related issues, and a comprehensive strategy that the City and community members can follow to improve resiliency in Redondo Beach.

Section 3.8.4 Project Impacts and Mitigation Measures

Page 3.8-34, MM HAZ-2c has been revised to clarify that PCE is tetrachloroethylene rather than trichloroethylene:

***MM HAZ-2c Soil Vapor Extraction (SVE) Equipment. Use*** *of an SVE vacuum blower (e.g., regenerative blowers, rotary lobe blowers, rotary claw blowers, centrifugal fan blowers, etc.) shall be implemented during construction within confined spaces, as necessary, to maintain Occupational Safety and Health Administration (OSHA) exposure limits or ~~trichloroethylene~~ tetrachloroethylene (PCE) and other volatile organic compounds (VOCs).*

Page 3.8-40, Impact HAZ-5 has been updated to clarify that BCHD would coordinate with the Torrance Fire Department (TFD) and Torrance Police Department (TPD) in preparation of the campus Emergency Plan:

Prior to operation, BCHD would coordinate with the RBFD and RBPD as well as TFD and TPD to prepare an Emergency Plan for the campus. Additionally, BCHD would utilize training procedures and an operational handbook that provides processes and procedures for BCHD staff to provide the first responder services.

## 3.9 HYDROLOGY AND WATER QUALITY

Section 3.9.4 Project Impacts and Mitigation Measures

Page 3.9-34, Impact HYD-1 has been updated to clarify the description of the 85$^{th}$ percentile storm:

Additionally, as further described in Impact HYD-3, Phase 1 of the proposed Project would involve the construction of an infiltration 85$^{th}$ system designed to retain, treat, and infiltrate the 85$^{th}$ percentile storm, which can be expected to result in 0.30 to 1.50 inches of rainfall in a 24-hour period, into the groundwater. (Again, the 85$^{th}$ percentile storm is used to represent the approximate

amount of rainfall that would occur from 85 percent of storms occurring in the Los Angeles RWQCB region.)

## 3.10 LAND USE AND PLANNING

Section 3.10.1 Existing Setting

Page 3.10-5 has been revised to clarify the zoning with the single family residential neighborhood to the east within the City of Torrance:

The neighborhood bordering the east of the Project site is located within Torrance and is designated as Low Density Residential (R-LO) (City of Torrance 2010b) and zoned as ~~single family residential (R-1)~~R-H/R-1 (Hillside and Local Coastal Overlay Zone [Hillside Overlay]/Single Family Residential District).

Section 3.10.2 Regulatory Setting

Page 3.10-11 has been revised to better clarify the requirements of RBMC 10-2.1116:

As described in Redondo Beach Municipal Code (RBMC) Section 10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district ~~P (Public and Institutional) land use designations~~ are subject to Planning Commission Design Review.

Page 3.10-11 has been revised to more accurately describe the Redondo Beach General Plan 2013-2021 Housing Element:

As described further in Section 3.12, *Population and Housing*, the Redondo Beach General Plan 2013-2021 Housing Element establishes goals, policies, and ~~implementation measures~~programs to specifically identify ways in which the housing needs of the existing and future resident population can be met~~. The Housing Element also establishes building requirements for mixed-use residential developments in mixed-use and regional commercial land use designations, and to enhance and promote pedestrian-oriented character of the commercial component and the neighborhood~~ (City of Redondo Beach 2017).

Page 3.10-11 has been revised to remove reference to the Redondo Beach General Plan Recreation and Parks Element:

~~*Redondo Beach General Plan Recreation and Parks Element*~~

~~The Redondo Beach General Plan Recreation and Parks Element contains policies and implementation measures to enhance the unique characteristics of the City. Such policies support~~

~~ongoing maintenance and facilitate expansion and improvement of parkland, recreational facilities, and programs. The Recreation and Parks Element provides the Redondo Beach Recreation and Community Services Department with measures to maximize the use of existing resources, as well as expand upon available opportunities through creative financing measures and cooperative relationships with other City departments and local agencies and organizations. The Recreation and Parks Element describes and categorizes existing park and recreation resources and current conditions, anticipates future needs, outlines, goals, objectives, and policies and an implementation program to meet these goals, objectives, and policies (City of Redondo Beach Recreation and Community Services Department 2004).~~

Section 3.10.4 Project Impacts and Mitigation Measures

Page 3.10-23, Table 3.10-3 has been revised to describe that the proposed Project would comply with the 0.5 FAR requirement for C-2 zones (see Policy 1.2.4 and 1.42.4):

~~However~~Additionally, this portion of the proposed RCFE Building would not exceed the 0.5 FAR requirement. ~~Nevertheless, w~~With the Planning Commission Design Review and issuance of a CUP, the proposed Healthy Living Campus Master Plan would not conflict with Policy 1.2.4 of the Redondo Beach General Plan Land Use Element and would not cause a significant environmental impact.

Page 3.10-23, Table 3.10-3, has been revised to describe that the proposed Project would comply with the 0.5 FAR requirement for C-2 zones (see Policy 1.42.4):

**~~Potential~~ No conflict**. As previously described, the proposed development within the vacant Flagler Lot would be ~~largely~~ consistent with the C-2 development standards. For example, the portion of the proposed RCFE Building located on the vacant Flagler Lot would be less than 30 feet tall and less than 2 stories. ~~However~~Additionally, this portion of the proposed RCFE Building would not exceed the 0.5 FAR requirement. ~~Nevertheless, Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located (subject to Planning Commission Design Review and issuance of a CUP). Additionally, while the FAR would be greater than 0.5, g~~Given that the height of the building within the vacant Flagler Lot would remain within 2 stories and below 30 feet, there would be no physical impact related to aesthetics or visual resources (refer to Section 3.1, *Aesthetics and Visual Resources*). Therefore, ~~while~~ the proposed Healthy Living Master Plan ~~may potentially~~ would not conflict with Policy 1.42.4 of the Redondo Beach General Plan Land Use Element~~, this potential conflict~~ and would not cause a significant environmental impact.

Page 3.10-33 and -34, Table 3.10-4, has been revised to describe that the proposed Project would comply with the 0.5 FAR requirement for C-2 zones (see RBMC Section 10-2.622):

~~**Potential**~~ **No conflict**. Refer to the discussion for Policy 1.42.4 of the Redondo Beach General Plan Land Use Element. The proposed development within the vacant Flagler Lot would be ~~largely~~ consistent with the C-2 development standards. For example, the proposed RCFE Building would be less than 30 feet tall and less than 2 stories. ~~However, t~~The proposed RCFE Building would not exceed the 0.5 FAR requirement. ~~Nevertheless, Policy 1.2.4 of the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located (subject to Planning Commission Design Review and issuance of a CUP). Additionally, while the FAR would be greater than 0.5, g~~Given that the height of the building within the vacant Flagler Lot would remain within 2 stories and below 30 feet, there would be no physical impact related to aesthetics or visual resources (refer to Section 3.1, *Aesthetics and Visual Resources*). ~~Therefore, while the proposed Healthy Living Master Plan may potentially conflict with RBMC Section 10-5.622, this potential conflict would not cause a significant environmental impact.~~

Page 3.10-34, Table 3.10-4, has been revised to correctly reference RBMC 10-2.1900 Land Scaping Regulations:

RBMC Section 10-~~5~~2.1900 establishes standards for installation of landscaping in order to enhance the aesthetic appearance of properties within the City, ensure the quality, quantity, and appropriateness of landscape materials, effect a functional and attractive design, improve compatibility between land uses, conserve water, control soil erosion, and preserve the character of existing neighborhoods.

## 3.11 NOISE

Section 3.11.3 Regulatory Setting

Page 3.11-16 through -19 has been revised to add the following objectives and policies:

Objective 10.4: Minimize the adverse impacts of traffic-generated noise on residential and other *"noise sensitive"* uses.

Policy 10.4.1 Require that all new non-residential development design and configure on-site ingress and egress points to divert traffic (and its resultant noise) away from *"noise sensitive"* land uses to the greatest degree practicable, and consistent with applicable safety and planning considerations.

Policy 10.5.1 Require that loading and shipping facilities for commercial and industrial land uses abutting residential parcels be located and designed in a manner to minimize the potential noise impacts upon these parcels to the greatest degree practicable.

Policy 10.5.5 Require that the hours of truck deliveries to commercial or industrial land uses abutting residential uses be limited (within a reasonable period) unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at other hours to the extent consistent with the adopted County of Los Angeles Congestion Management Plan (CMP), or other applicable County, State, or Federal requirements relative to this subject.

Objective 10.6: Minimize the potentially adverse noise impacts associated with the development of mixed-use structures where residential units are located above ground floor commercial uses (where permitted).

Policy 10.6.1 Ensure that mixed-use building are constructed to prevent adverse noise transmission between differing uses or tenants located in the same structures.

Policy 10.6.2 Require that mixed-use structures designed for commercial and residential land uses minimize to the greatest degree practicable (through design and construction techniques or other such technological means as may become available) the transfer or transmission of noise and vibration from the commercial land use to the residential land use.

Objective 10.8: Ensure that buildings are constructed soundly to prevent adverse noise transmission between differing uses or tenants located in the same commercial structure and individual dwelling units in multi-family residential structures.

Policy 10.8.1 Enforce the applicable provisions of the Uniform Building Code (UBC) and City of Redondo Beach Municipal Code which prevent the transmission of excessive and unacceptable noise levels between individual tenants and businesses in commercial structures and between individual dwelling units in multi-family residential structures.

Page 3.11-18 has been revised to correctly reference RBMC Section 4-24.301 and 4.24.401:

The RBMC states that *"no person ~~may~~ shall operate, or cause to be operated, any source of sound at any location within the City or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level when measured on any other property to exceed"* the assigned noise levels for the various land use categories shown in Table 3.11-9 (RBMC Section ~~3~~4-24.301 and 4.24.401).

Table 3.11-6, Table 3.11-19, and Table 3.11-20 have been revised to show that the proposed RCFE Building was considered during the modeling of construction noise for Phase 1.

Page 3.11-38, MM NOI-1 has been revised to describe compliance with RBMC Code Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1:

- *Construction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday ~~to the maximum extent feasible~~, in accordance with Redondo Beach Municipal Code (RBMC) Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1.*

Page 3.11-43, Impact NOI-3 has been revised to include a description of operational noise associated with the SCE Substation:

*Substation and Electrical Yard*

The proposed electrical yard would include a new Southern California Edison (SCE) substation yard, medium voltage distribution system, and generator yard. New voltage substation transformers generate noise levels of 45 to 50 dBA at a distance of 50 feet (National Electrical Manufacturers Association 2014; Delta Transformers Inc. 2009). The electrical yard would be located on the southern portion of the Project site, approximately 100 feet from the nearest residence located on Diamond Street. Based on this distance, noise levels of the electrical yard would be 44 dBA at the nearest residence. The existing daytime noise levels of 63 $L_{dn}$ along Diamond Street, which is largely due to the relatively high level of traffic noise along streets in the vicinity of the Project site. Therefore, noise impacts relating to the electrical yard would likely be imperceptible and would result in *less than significant* operational noise impacts.

Page 3.11-47, Impact NOI-3 has been revised to remove the reference to a dining terrace. This area would be more accurately described as a rooftop garden in the current iteration of the BCHD Healthy Living Campus Master Plan.

The outdoor dining spaces at the proposed RCFE Building constructed under the Phase 1 preliminary site development plan~~, including the dining terrace on the south side of the building, the porch on the south side of the building, and the larger dining terrace above the PACE services on the north side of the building,~~

### 3.12 POPULATION AND HOUSING

Section 3.12.1 Existing Setting

Page Section 3.12-7 has been revised to describe the Final Regional Housing Needs Assessment (RHNA):

~~SCAG is in the process of developing~~ T~~t~~he 6th Cycle Final RHNA Allocation Plan~~, which~~ will cover the planning period October 2021 through October 2029. The ~~Draft~~ 6th Cycle Final RHNA allocates 2,490 ~~2,483~~ housing units to Redondo Beach for the 2021-2029 RHNA planning period, of which 936 ~~933~~ new units are designated as units for households with very-low income levels (SCAG 2020c~~b~~).

Section 3.12.4 Project Impacts and Mitigation Measures

Page 3.12-15, Impact PH-1 has been revised to provide a more conservative analysis of population growth:

As previously described, Redondo Beach has an estimated population of 66,749 and 30,866 housing units according to the California Department of Finance. Assuming 100 percent occupancy of the 157 new Assisted Living units, implementation of the proposed Project would increase the population of Redondo Beach by less than 1 percent (i.e., 0.3-percent increase); therefore, the maximum population increase would be negligible. (It should also be noted that this estimate is conservative given that the market studies prepared for the proposed Project indicate that at a proportion of the Assisted Living residents would come from the existing and future populations of Redondo Beach.) Even with the conservative assumption that all residents of the proposed 157 new Assisted Living units currently live alone within Redondo Beach and that their homes would be occupied by new residents at an average rate of 2.34 persons per dwelling unit. this would create a maximum population increase of approximately 367, which would still be less than 1 percent (i.e., 0.55 percent) increase of the Redondo Beach population. This minor increase in population would be consistent with and well within SCAG's growth projections, which estimate the population Redondo Beach would increase by approximately 6.9 percent by 2045 (refer to Table 3.12-2).

## 3.13 PUBLIC SERVICES

Section 3.13.1 Existing Setting – Fire Protection

Page 3.13-12 has been updated to correctly reference RBMC 3-4.101:

Redondo Beach Municipal Code (RBMC) Section 3-~~.0~~4.101 adopts the California Fire Code as the Fire Code for the City of Redondo Beach.

Additionally, Page 3.13-12 has been revised to provide updated information on RBFD staffing:

Funding for the RBFD is determined through Redondo Beach's annual budget process. As required by City of Redondo Beach Charter Section 17.9, the annual budget must be adopted by the City Council on or before June 30 of each year. Under the City's current budget, the Fire Department is authorized ~~for 67 personnel, including 62 sworn firefighter and officer positions (City of Redondo Beach Financial Services Department 2019). The proposed Fiscal Year 2020-2021 budget would authorize~~ a total of ~~67~~ 60 personnel, including ~~62~~ 56 sworn firefighter and officer positions (City of Redondo Beach ~~2020d~~Financial Services Department 2020). As well as personnel, other operating expenses identified in the annual budget consist of maintenance and operations, internal service fund allocations, and capital outlays.

Section 3.13.6 Existing Setting – Law Enforcement

Page 3.13-21 has been revised to provided updated information on RBPD staffing:

Funding for the RBPD is determined through Redondo Beach's annual budget process. As required by City of Redondo Beach Charter Section 17.9, the annual budget must be adopted by the City Council on or before June 30 of each year. Under the City's current budget, RBPD is authorized for ~~154 personnel, including 96 sworn positions (City of Redondo Beach Financial Services Department 2019). The proposed Fiscal Year 2020-2021 budget would authorize~~ a total of ~~153~~ 145 personnel, including ~~95~~92 sworn positions ~~(City of Redondo Beach 2020a)~~ (City of Redondo Beach Financial Services Department 2020). Besides personnel, other operating expenses identified in the annual budget consist of maintenance and operations, internal service fund allocations, and capital outlays.

Section 3.13.8 Project Impacts and Mitigation Measures – Law Enforcement

Page 3.13-23, Impact PS-2, has been updated to provide minor revisions to the impact description:

Additionally, the proposed Project would include new and ~~updated~~ adequate security lighting on site~~, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities,~~ pursuant to the requirements of RBMC Section 10-~~5~~2.1706(c)(10).

### 3.14 TRANSPORTATION

Section 3.14.1 Existing Setting

Page 3.14-7 has been revised to describe Flagler Lane as a local street:

**Flagler Lane** is a north-south collector street that runs from Towers Street to Artesia Boulevard and provides one travel lane in each direction. Between Towers Street and Beryl Street, Flagler Lane is considered a local street. The portion of Flagler Lane along the western border of Dominguez Park between Anita Street and Beryl Street provides a center left-turn lane and on-street parking.

Section 3.14.2 Regulatory Setting

Page 3.14-28 and 3.14-29 has been revised to correctly describe Redondo Beach General Plan Circulation Element Goal G2, Policy P21, and Goal G15:

Goal G~~1~~2: Reduce Year 2030 trip generation by 25 percent compared to 2007 levels.

Policy P21 Work with adjacent cities to coordinate incentives for carpools, vanpools, and other measures for Redondo Beach~~ incentives~~ residents.

Goal G15: Ensure that ~~residences~~residents will be able to walk or bicycle to destinations such as the beach, the Civic Center, Redondo Beach Pier, Riviera Village, and other activity centers.

Section 3.14.4 Project Impacts and Mitigation Measures

Page 3.14-57, MM T-1 has been revised to include access to BCHD vehicles:

- *Partner with rideshare companies such as Uber or Lyft to guarantee availability of an emergency ride home or provide access to ~~City~~BCHD vehicles for this purpose.*

Page 3.14-64, Impact T-3, has been revised to clarify:

The existing Class II bicycle lane would be maintained on Beryl Street east of Flagler Lane following the driveway realignments along eastbound Beryl Street. The final design plans of the

proposed new driveways along Beryl Street and Flagler Lane would be subject to review by the Redondo Beach Engineering Division and Torrance Community Development Department~~s~~.

Page 3.14-65 through -67, MM T-2, has been revised to make the following clarifications:

***MM T-2*** ***Construction Traffic and Access Management Plan*** *Following preparation of the final design plan for Phase 1 of the proposed Project, the Beach Cities Health District (BCHD) shall expand upon the Construction Traffic Control Plan and prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be subject to review and approval by ~~BCHD,~~ the California Department of Transportation (Caltrans), County Department of Transportation (DOT), ~~and~~ Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department prior to issuance of a Conditional Use Permit (CUP). The Construction Traffic and Access Management Plan shall be designed to:*

- *~~Construction crew parking.~~ On-site construction crew parking to the maximum extent feasible; and*
- *Prohibition of crew parking in adjacent residential neighborhoods.*
- *Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed contingent upon the issuance of an after-hours construction permit from the Redondo Beach Public Works Department Engineering Division and Torrance Community Development Department.*
- *BCHD shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, Redondo Beach Fire Department [RBFD], Redondo Beach Police Department [RBPD], Torrance Fire Department [TFD], Torrance Police Department [TPD], Public Works Department, and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet prior to the implementation of Phase 1 and Phase 2 of the proposed Project.*
- *BCHD shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks or longer per each submittal.*

## 3.15 UTILITIES AND SERVICE SYSTEMS

Section 3.15.1.1 Environmental Setting – Water Infrastructure and Supply

Page 3.15.2 has been revised to include description of the fire hydrant on the east end of the Project site:

There are currently ~~seven~~ eight fire hydrants located on or adjacent to the BCHD campus, two of which are located within the northern surface parking lot, one on the west side and the other on the east side, south of the vacant Flagler Lot. A third fire hydrant is located adjacent to the west end of the Beach Cities Health Center. A fourth fire hydrant is located adjacent to the parking spaces along the eastern end of the Project site.

Section 3.15.1.2 Regulatory Setting – Water Infrastructure and Supply

Page 3.15.12 has been revised to include additional policies from the Redondo Beach General Plan Utilities Element:

Objective 6.1: Provide a comprehensive and modern system of sanitary sewer collection and treatment facilities which will adequately collect, convey, and treat sewerage generated by existing and future development in the city. The services shall be provided and system operated in an ecologically-sensitive manner.

Policy 6.1.5 Require that the approval of new development in the city be contingent upon the ability of the project to be served with adequate sanitary sewer infrastructure and service.

Policy 6.1.10 Examine the feasibility and potential for the use of reclaimed water for irrigation and cleaning purposes, in both public and private facilities.

Objective 6.2: Ensure the provision of a comprehensive and modern system of storm drainage facilities that will adequately collect, convey, and remove/dispose of the quantities of storm water and excess water that are generated in the city. The services shall be provided and system operated in an ecologically-sensitive manner.

Policy 6.2.3 Require that the approval of new development in the city be contingent upon the ability of the project to be served with adequate storm drainage infrastructure and service.

Policy 6.2.7 Require that improvements to or expansion of existing storm drainage facilities necessitated by specific new development projects be borne by the project proponent, either through the payment of impact fees or the actual construction of such improvements.

Page 3.15.14 has been revised to include additional policies from the Redondo Beach General Plan Land Use Element related to water conservation and sustainability:

Policy 1.55.7 Encourage the use of drought-tolerant species in landscape design.

Policy 1.55.8 Require that development incorporate adequate drought-conscious irrigation systems and maintain the health of the landscape.

Policy 1.55.9 Require that all landscape be adequately irrigated with automatic irrigation systems.

## 5.0 ALTERNATIVES

Section 5.3 Summary of Potentially Significant Impacts

Page 5-3 through 5-11 have been revised to more completely describe every potentially significant impact with required mitigation measures.

Section 5.4 Alternatives Considered but Rejected from Further Analysis

Page 5-12 has been updated to provide a description of another alternative that was considered by BCHD, which would involve demolition of the Beach Cities Health Center before the development of the proposed RCFE Building within the central area of the campus.

Demolish the Beach Cities Health Center and Redevelop within the Center of the BCHD Campus

BCHD considered an alternative approach to redeveloping the existing campus by demolishing the existing Beach Cities Health Center before constructing the proposed RCFE Building. Under this alternative BCHD considered three conceptual site plan layouts. Two of these conceptual site plan layouts involve the positioning of the proposed RCFE Building in a similar location along the northern perimeter of the campus behind the Redondo Village Shopping Center. However, under both of these conceptual site plan layouts, portions of the proposed RCFE Building would extend into the original footprint of the Beach Cities Health Center. The third conceptual site plan alternative considered repositioning the RCFE Building into the central area of the campus with the open space located along the northern perimeter of the campus behind the Redondo Village Shopping Center.

Each of the three conceptual site plan layouts would require tradeoffs in the internal circulation and the size and utility of the open space. Only one of these conceptual site plan layouts (i.e., locating the proposed RCFE Building within the center of the campus) would measurably decrease

the frontage of the proposed RCFE Building along the eastern border of the campus. However, each of these conceptual site plans would result in a longer duration for construction activities due to a stop-start nature of construction. Under the proposed Project there would be some overlap in construction and demolition activities, whereas under these conceptual site plan layouts demolition would need to be completed prior to the construction of the proposed RCFE Building. It is estimated that the start-stop nature of construction activities under this alternative would result in an additional 6 months of construction during Phase 1. Additionally, as described in Section 2.4, *Project Objectives*, the continued operation of the Beach Cities Health Center is necessary to ensure revenue for programs and services provided by BCHD as well as funding for the completion of the development under Phase 1. The demolition of the Beach Cities Health Center under this alternative would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the proposed demolition and construction. This would be financially infeasible for BCHD and would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD.

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# 11.0 MITIGATION, MONITORING, AND REPORTING PROGRAM

California environmental Quality Act (CEQA) Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* The following MMRP provides a summary of each Mitigation Measure (MM) for the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) and the monitoring implementation responsibility for each measure. The MMRP for the proposed Project would be in place through all phases of the proposed Project, including design, construction, and operation of the Phase 1 preliminary site development plan and the more general Phase 2 development program.

## 11.1 PURPOSE

The purpose of the MMRP is to ensure that measures provided in the Environmental Impact Report (EIR) to minimize or avoid significant adverse effects are implemented. The MMRP can also act as a working guide to facilitate not only the implementation of mitigation measures, but also the monitoring, compliance, and reporting activities of the implementing agency and any monitors it may designate.

## 11.2 RESPONSIBILITIES

As the lead agency, the Beach Cities Health District (BCHD) would be responsible for implementing the adopted mitigation measures as defined in this EIR. For each MMRP activity, BCHD would either administer the activity, or delegate it to the Construction Contractor or another qualified professional. BCHD would also ensure that monitoring is documented as required and that deficiencies are promptly corrected. The City of Redondo Beach and the City of Torrance as well as other relevant agencies, would also be responsible for enforcement actions for activities within their jurisdictional purview to address any non-performance issues.

BCHD would be responsible for funding and successfully implementing all the mitigation measures identified in the MMRP. Standards for successful mitigation of impacts are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds would be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures (e.g., Air Quality Management Plan, Construction Noise Management Plan, Construction Traffic and Access Management Plan).

## 11.3 MONITORING PROCEDURES

Many of the monitoring procedures would be conducted during construction of the Phase 1 preliminary site development plan and Phase 2 development program. BCHD is responsible for integrating the mitigation monitoring procedures into the construction process in coordination with the Construction Contractor. To oversee the monitoring procedures and to ensure success, the qualified professional assigned to a monitoring action must be on-site during the applicable portion of construction or operation that has the potential to create a significant environmental impact or other impact for which mitigation is required.

Site visits and specified monitoring procedures performed by each qualified professional would be reported to BCHD. The qualified professionals would note any problems that may occur and take appropriate action as directed by BCHD to rectify the problem.

## 11.4 MONITORING TABLE

For each mitigation measures, Table 11-1 identifies: 1) the full text of the mitigation measure; 2) the key monitoring/reporting action(s) that needs to be performed, including the applicable timing; 3) the entity(ies) responsible for performing the action(s); and 4) the entities responsible for verifying compliance as well as implementing enforcement actions, if necessary.

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| **AESTHETICS AND SHADE/SHADOW EFFECTS** | | | |
| **MM VIS-1 Reduced Residential Care for the Elderly (RCFE) Building Height.** The final design of the Phase 1 preliminary site development plan shall be revised to reduce the maximum height of the RCFE Building in order to avoid interruption of the ridgeline of the Palos Verdes hills as viewed from the intersection of 190th Street & Flagler Lane. This revision to the final design could include a reduction in the floor-to-ceiling height, removal of the uppermost stories of the building, and/or recessing the building foundation further into the ground surface. The reduced building height shall be formalized on all final building plans and construction plans, as appropriate, prior to the issuance of any demolition, grading, or building permits by the Redondo Beach Building & Safety Division. City of Redondo Beach permit compliance staff shall observe and ensure compliance with these specifications during construction activities associated with the proposed Project. | Revise Phase 1 site development plan to reduce the height of RCFE Building. | BCHD and Architect responsible for revising the Phase 1 site development plan. | BCHD and City of Redondo Beach Building & Safety Division. |
| **AIR QUALITY** | | | |
| **MM AQ-1 Air Quality Management Plan.** The Beach Cities Health District (BCHD) shall prepare an Air Quality Management Plan for construction of the proposed Project, which shall be approved by the City of Redondo Beach and the City of Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. The plan shall include the following conditions for construction:<br>• Construction equipment engines shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.<br>• All construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction to reduce the amount of particulate matter entrained in the ambient air. These measures include the following:<br>o Quick replacement of ground cover in disturbed areas.<br>o Watering of exposed surfaces three times daily.<br>o Watering of all unpaved haul roads three times daily.<br>o Covering all stock piles with tarp.<br>o Post signs on-site limiting traffic to 15 miles per hour (mph) or less on unpaved roads. | Prepare Air Quality Management Plan for approval by the City of Redondo Beach and City of Torrance for construction activities within their respective jurisdictions.<br><br>Implement air quality management measures during construction. | BCHD responsible for preparing the plan.<br><br>City of Redondo Beach and City of Torrance Building & Safety Division responsible for approving the plan for construction activities within their respective jurisdictions.<br><br>Construction contractor responsible for | BCHD responsible for Construction Contractor oversight.<br><br>City of Redondo Beach and City of Torrance Building & Safety Division and Permit Compliance Staff responsible for enforcement actions, if necessary, within their respective jurisdictions. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| ○ Prohibit demolition when wind speed is greater than 25 mph.<br>○ Sweep streets adjacent to the Project site at the end of the day if visible soil material is carried over to adjacent roads.<br>○ Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.<br>○ Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip.<br>• Construction activities associated with the proposed Project shall use U.S. Environmental Protection Agency (USEPA) Tier 4 engines on all construction equipment, except crushing equipment, which would reduce diesel particulate matter (DPM) emissions from combustion by 94 percent for Phase 1 and 79 percent for Phase 2 construction.<br>• Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.<br>Construction contractors shall ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD shall demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction. | | implementing the plan. | |
| **BIOLOGICAL RESOURCES** | | | |
| **MM BIO-1 Pre-Construction Nesting Bird Surveys.** To prevent impacts to nesting or roosting birds through loss or damage of mature trees, the Beach Cities Health District (BCHD) shall comply with the following:<br>• Where suitable vegetation and structures for nesting birds occur within 500 feet of construction activities, all phases of construction shall avoid the general nesting season (i.e., between February 15 and August 31) to the maximum extent practicable.<br>• If the nesting season cannot be avoided, a qualified biologist shall be retained to conduct a pre-construction survey for nesting birds. The survey shall be conducted within 72 hours prior to commencement of vegetation removal.<br>• If any nesting birds are present within or immediately adjacent to the construction area, the following shall be required: A qualified biologist shall be retained by BCHD | Avoid construction activities within 500 feet of suitable vegetation and structures for birds during the general nesting season (i.e., between February 15 and August 31). | BCHD and Construction Contractor responsible for avoiding construction activities during the general nesting season. | BCHD responsible for ensuring access for the Qualified Biologist, if necessary, and compliance by Construction Contractor.<br><br>USFWS responsible for |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| to flag and demarcate the location of all nesting birds and monitor construction activities. Temporary avoidance of active nests, including the enforcement of an avoidance buffer determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.<br>• If Federal or State protected species are observed during the site survey, consultation shall be completed with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to determine if work shall commence or proceed during the breeding season; and, if work may proceed, what specific measures shall be taken to ensure protected bird species are not affected. | Complete pre-construction bird nesting surveys for construction activities during the general nesting season, if necessary.<br><br>Flag and avoid nesting birds and active nests.<br><br>Consult with USFWS and CDFW, if necessary. | BCHD responsible for retaining a Qualified Biologist, if necessary.<br><br>Qualified Biologist responsible for conducting pre-construction surveys and enforcing appropriate buffer distance, if necessary.<br><br>BCHD responsible for consulting with USFWS and CDFW, if necessary. | enforcement actions related to migratory birds and federally listed species.<br><br>CDFW responsible for enforcement actions related to State-listed and other special status species. |
| **CULTURAL RESOURCES** | | | |
| **MM CUL-1a Native American Monitoring.** Prior to the commencement of any ground disturbing activities at the Project site, the Beach Cities Health District (BCHD) shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. The Native American Monitor shall only be present on-site during the construction phases that involve ground-disturbing activities, defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, within the Project site. The Native American Monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Native American Monitor and Tribal Representatives have indicated that all | Monitoring during the construction phases that involve ground-disturbing activities.<br><br>Prepare daily monitoring logs.<br><br>Cease work in the immediate vicinity upon discovery of any | Native American Monitor responsible for monitoring and keeping daily monitoring logs.<br><br>BCHD and Construction Contractor responsible for | BCHD responsible for ensuring access for the Native American Monitoring as well as compliance from Construction Contractor. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.<br>Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (i.e., not less than the surrounding 100 feet) until the find can be assessed. All archaeological resources unearthed by ground disturbing activities shall be evaluated by the Native American Monitor. If the archaeological resources are Native American in origin, the Consulting Tribe shall retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.<br>If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the County coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5. Human remains and grave/burial goods shall be treated alike per Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (California Environmental Quality Act [CEQA] Guidelines Section 15064.5[f]). | Tribal Cultural Resources.<br><br>Comply with Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5. | ceasing work in the immediate vicinity, upon discovery of any Tribal Cultural Resources.<br><br>BCHD and Consulting Tribe responsible for compliance with Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5 | |
| **MM CUL-1b Archaeological Monitoring.** Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan shall be developed by a qualified archaeologist. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist shall be required during ground disturbing activities during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a | Develop and implement a Cultural Resources Monitoring Plan and Treatment Plan. | BCHD responsible for retaining a Qualified Archaeologist.<br><br>Qualified Archaeologist responsible for preparing and implementing the plan. | BCHD responsible for ensuring access for the Qualified Archaeologist as well as compliance from Construction Contractor. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary. | | | |
| **MM CUL-2 Inadvertent Discoveries.** A qualified archaeologist shall be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than 100 feet from the find. The treatment of the archaeological resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. | Retain a Qualified Archaeologist for the duration of ground-disturbing activities.<br><br>Cease work within 100 feet upon inadvertent discovery of prehistoric or historic-period archaeological resources | BCHD responsible for retaining a Qualified Archaeologist.<br><br>BCHD and Construction Contractor responsible for ceasing work in the immediate vicinity, upon discovery of any inadvertent discoveries. | BCHD responsible for ensuring access for the Qualified Archaeologist as well as compliance from Construction Contractor. |
| **ENERGY** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |
| **GEOLOGY AND SOILS** | | | |
| **MM GEO-1 Geotechnical Report Recommendations.** The proposed Project shall comply with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the proposed Project. The Beach Cities Health District (BCHD) shall incorporate these recommendations into all final grading plans, design drawings, and construction plans, as appropriate, prior to the issuance of any demolition or grading permits and shall submit the appropriate plans to the City of Redondo Beach and the City of Torrance Building & Safety Divisions prior to the issuance of any demolition or grading permits. City of Redondo Beach and City of Torrance permit compliance staff shall review all final grading plans, design drawings, and construction plans, as appropriate, and | Incorporate all Geotechnical Report recommendations into all final grading plans, design drawings, and construction plans. | BCHD and Architect responsible for incorporating recommendations.<br><br>City of Redondo Beach and City of Torrance Building & Safety Division | BCHD responsible for Construction Contractor oversight.<br><br>City of Redondo Beach and City of Torrance Building & Safety Division and Permit |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| observe earthwork and grading to ensure compliance with these recommendations and specifications. | | responsible for approving plans.<br><br>Construction Contractor responsible for complying with recommendations. | Compliance Staff responsible for enforcement actions, if necessary, within their respective jurisdictions. |
| **MM GEO-2a Worker Paleontological Resource Awareness Session.** In order to educate construction contractors regarding the protection of any paleontological resources that are unexpectedly discovered during excavations associated with the proposed Project, the Beach Cities Health District (BCHD) shall retain a qualified paleontologist to develop a worker awareness program to educate all workers regarding the paleontological resources that, while unlikely, may occur on the development site as well as appropriate procedures to enact should paleontological resources be discovered during development. The qualified paleontologist shall develop appropriate training materials including, but not limited to, a summary of geologic units present at the Project site by depth, a description of potential paleontological resources that may be encountered during the proposed excavations, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to the initiation of excavation and grading activities or prior to the start of work onsite for new workers hired after the initial awareness session. BCHD shall provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested. | Worker awareness training program developed by Qualified Paleontologist.<br><br>Submit documentation of employee attendance to City of Redondo Beach and City of Torrance Permit Compliance Staff. | BCHD responsible for retaining a Qualified Paleontologist.<br><br>Qualified Paleontologist responsible for preparing and implementing the awareness working awareness training program. | BCHD responsible for Construction Contractor oversight. |
| **MM GEO-2b Paleontological Resources Inadvertently Discovered During Ground-Disturbing Activities.** In the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities the following actions would be implemented by the construction contractor to prevent potential significant impacts on paleontological resources:<br>• Temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made. | Upon paleontological resources discovery, cease work in the immediate vicinity, notify City of Redondo Beach and/or the City of Torrance. | BCHD responsible for retaining a Qualified Paleontologist<br><br>BCHD and Construction Contractor responsible for | BCHD responsible for ensuring access for the Qualified Paleontologist as well as compliance from Construction Contractor. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
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| • Immediately notify the City of Redondo Beach and/or the City of Torrance regarding the resource and redirected ground-disturbing activity.<br>• Obtain the services of a qualified professional paleontologist who shall assess the significance of the find and provide recommendations, as necessary, for its proper disposition.<br>• Complete all significance assessment and mitigation of impacts to the paleontological resource prior to resuming ground-disturbing activities in the area of the find. | Retain Qualified Paleontologist.<br><br>Complete significance assessment and mitigation of impacts to the paleontological resource. | ceasing work in the immediate vicinity, upon discovery of any inadvertent discoveries. | |
| **GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |
| **HAZARDS AND HAZARDOUS MATERIALS** | | | |
| **MM HAZ-1 Asbestos-Containing Material (ACM), Lead-Based Paint (LBP), polychlorinated biphenyls (PCBs), and Mold Surveys.** Prior to the issuance of a demolition permit by the Redondo Beach Building & Safety Division, the Beach Cities Health District (BCHD) shall retain a licensed contractor to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and potentially the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, BCHD and the licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. During construction the licensed contractor shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed. | Complete a comprehensive ACM, LBP, PCB, and mold survey prior to construction activities.<br><br>Abate in compliance with all applicable Federal, State, and local codes and regulations, if necessary.<br><br>Conduct additional surveys as new areas of the buildings become exposed. | BCHD responsible for retaining a licensed contractor(s).<br><br>Licensed contractor(s) responsible for surveys and abatement, if necessary. | BCHD responsible for oversight of licensed contractor(s).<br><br>City of Redondo Beach and City of Torrance Building & Safety Division and Permit Compliance Staff responsible for enforcement actions, if necessary, within their respective jurisdictions. |
| **MM HAZ-2a Soils Management Plan.** Prior to approval of issuance of demolition, grading, or building permit by the Redondo Beach Building & Safety Division and/or approval of a grading plan by the City of Redondo Beach Building & Safety Division and the City of | Prepare and implement of a Soils Management | BCHD responsible for preparing plan. | BCHD responsible for Construction |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| Torrance Building & Safety Division, the Beach Cities Health District (BCHD) shall prepare and submit a Soils Management Plan and a Transportation Plan to the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and Los Angeles Regional Water Quality Control Board (RWQCB) as well as the City of Redondo Beach and City of Torrance, for review. The Soils Management Plan and Transportation Plan shall include, but shall not be limited to the following:<br><br><u>Soils Management Plan</u><br><br>Affected soils shall be either directly loaded into awaiting trucks for immediate off-site disposal or temporarily stockpiled on plastic sheeting prior to load-out and off-site disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came.<br><br>Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following:<br><br><u>Soil and Material Segregation</u><br><br>Overburden soils shall be screened with an Organic Vapor Analyzer (OVA) in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166. Any significant quantities of construction debris encountered during excavation shall be segregated and disposed of in accordance with Federal, State, and local regulations. Soil cuttings during the excavation and installation of soldier piles shall be disposed of off-site with any affected soils from the deep excavation.<br><br><u>Stockpile Management</u><br><br>The stockpiled soils for load-out shall be segregated by waste classification:<br><br>• Non-hazardous waste.<br>• Volatile organic compound (VOC)-contaminated non-hazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm.<br>• VOC-contaminated non-hazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and | Plan and Transportation Plan.<br><br>Submit plans to the LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, City of Redondo Beach, and City of Torrance. | LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, City of Redondo Beach, and City of Torrance responsible the plan for construction activities within their respective jurisdictions.<br><br>Construction contractor responsible for implementing plan. | Contractor oversight.<br><br>LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, City of Redondo Beach, and City of Torrance responsible for enforcement actions, if necessary, within the purview of their jurisdictional authorities. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| placed in a sealed container (roll-off bin) or directly loaded into a suitable transport truck, moistened with water, and covered with a tarp for off-site transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan.<br><br>The temporary stockpiles containing affected soils shall be managed as follows:<br><br>• The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust.<br><br>• The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.<br><br>• Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made.<br><br>• If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations.<br><br>• During stockpile generation and removal, only the working face of the stockpile shall be uncovered.<br><br><u>Decontamination Methods and Procedures</u><br><br>Each piece of equipment used for the excavation of affected soils shall have a clean-out bucket or continuous edge across the cutting face of its bucket. No excavation of affected soil shall be permitted with equipment utilizing teeth across the cutting edge of its bucket.<br><br>Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated | | | |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
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| to prevent the on- and off-site distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas.<br><br>Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out.<br><br>Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated, but shall be packaged for appropriate off-site disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures:<br>• Non-phosphate detergent and tap-water wash, using a brush if necessary.<br>• Tap-water rinse.<br>• Initial deionized/distilled water rinse.<br>• Final deionized/distilled water rinse.<br><br><u>Truck Loading</u><br><br>Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed, and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following:<br>• Materials shall be transported to an approved treatment/disposal facility. | | | |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| • No excavated material shall extend above the sides or rear of the truck/trailer.<br>• Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.<br>• The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material off-site.<br><br>Storm Water Management<br><br>General construction best management practices (BMPs) identified by the Los Angeles RWQCB shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with Federal, State, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include:<br>• Pumping the standing water into temporary aboveground storage tanks for reuse on-site for dust suppression.<br>• Pumping the standing water through filters and a carbon adsorption filter (if required based on analytical results) prior to discharge to a storm drain.<br>• Pumping the standing water into vacuum trucks for transport and disposal at a recycling facility.<br><br>Transportation Plan<br><br>All affected soils shall be transported off-site for lawful management and disposal. Prior to load-out, the construction contractor shall prepare waste profiles for the receiving facility using analytical data from the previous environmental site assessment. | | | |
| **MM HAZ-2b Soil Vapor Monitoring.** During soil disturbance activities with the potential to disturb tetrachloroethylene (PCE)-contaminated soil, soil vapor monitoring shall be conducted by the construction contractor using a photoionization detector (PID) 10.6 or 11.7 | Soil vapor monitoring using a PID. | Construction Contractor responsible for | BCHD responsible for Construction |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| eV lamp. Use of the PID shall ensure that the Occupational Safety and Health Administration (OSHA) exposure limits for PCE and other volatile organic compounds (VOCs) are maintained. In the event that the OSHA exposure limits are exceeded, work within the confined space would be temporarily stopped until the use of a Soil Vapor Extraction (SVE) vacuum blower reduces it to below this limit (see MM HAZ-2c). | Cease work upon exceedance of OSHA exposure limits for PCE and other VOCs until reduced below limits by SVE vacuum blower | monitoring soil vapor.<br><br>Construction Contractor responsible for ceasing work if exposure limits are exceeded. | Contractor oversight. |
| **MM HAZ-2c Soil Vapor Extraction (SVE) Equipment.** Use of an SVE vacuum blower (e.g., regenerative blowers, rotary lobe blowers, rotary claw blowers, centrifugal fan blowers, etc.) shall be implemented during construction within confined spaces, as necessary, to maintain Occupational Safety and Health Administration (OSHA) exposure limits or tetrachloroethylene (PCE) and other volatile organic compounds (VOCs). | Use of SVE equipment during construction within confined spaces, as necessary. | Construction Contractor responsible for using SVE Equipment. | BCHD responsible for Construction Contractor oversight. |
| **MM HAZ-2d Discovery of Contamination.** In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer, or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., Los Angeles County Fire Department [LACoFD] and Los Angeles Regional Water Quality Control Board [RWQCB]). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health | Cease work upon encountering previously unknown or unidentified soil and/or groundwater contamination.<br><br>If necessary, retain a qualified environmental specialist, prepare a Human Health Risk Management Plan prepared, notify LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, and prepare | Construction Contractor responsible for ceasing work if previously unknown or unidentified contamination is discovered.<br><br>BCHD responsible for retaining Qualified Environmental Specialist. | BCHD responsible for Construction Contractor oversight.<br><br>LACoFD Health Hazardous Materials Division, and Los Angeles RWQCB responsible for enforcement actions, if necessary, within the purview of their jurisdictional authorities. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| Administration (OSHA) requirements shall be prepared and in place prior to commencement of work in any contaminated area. | a Site Health and Safety Plan. | | |
| **MM HAZ-3 Well Review Program.** Prior to demolition or ground-disturbing activities on the vacant Flagler Lot, the Beach Cities Health District (BCHD) shall enroll in the California Geologic Energy Management Division's (CalGEM's) Well Review Program. Following enrollment in the Well Review Program CalGEM would:<br>• Identify/confirm the location of the previously abandoned and plugged oil and gas well on the property.<br>• Provide a review of the previously abandoned and plugged oil and gas well located on the Project site. The review process shall consist of determining the abandonment status of the well by examining past plugging operations, and then comparing the abandonment status with current abandonment standards.<br>• Provide an evaluation of all known wells located on the development site property. The evaluation process will consist of: 1) verifying that the previously abandoned and plugged oil and gas well has a competent surface plug; and 2) verifying the wells are not leaking any fluids or gas. BCHD shall be responsible for the removal of all metal plates attached to the top of casings of the well prior to the evaluation to prevent the buildup of methane gas underneath metal plates. Following evaluation, a metal identification plate shall be welded (without full bead) to the top of the well casing to allow any potential gas leakage to vent out of the casing and prevent pressure from building up in the wellhead. For identification purposes, the metal identification plate shall show the well's name and Assessor Parcel Identification number.<br>• Ensure proper well restoration following evaluation. Proper well site restoration shall include the removal of all associated well equipment, junk, and debris and any well excavation needs to be filled with earth, compacted properly to prevent settling, and graded over. Pursuant to California Code of Regulations (CCR) Section 1776, well site restoration must be completed within 60 days following the evaluation of a well.<br>• Issue a Well Review Letter to BCHD and local permitting agencies (i.e., the City of Redondo Beach and the City of Torrance). The Well Review Letter will list the current status of all known wells located on the development site property, and it will | Enroll in CalGEM's Well Review Program and adhere to all recommendations provided by CalGEM. | BCHD responsible for enrollment. | CalGEM responsible for continued regulation of the previously abandoned oil and gas well. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| provide other important information associated with development near oil or gas wells.<br><br>BCHD shall adhere to all recommendations provided by CalGEM, which may include maintaining rig access to the well, avoiding building over or in close proximity to the well, and implementing surface mitigation measures that are determined necessary by CalGEM. Surface mitigation measures may include installation of venting systems for wells, venting systems for parking lots, patios, and other hardscape, methane barriers for building foundations, methane detection systems, and collection cellars for well fluids by a licensed Professional Engineer. The permitting of surface mitigation measures shall fall under the authority of the City of Redondo Beach and the City of Torrance. | | | |
| **HYDROLOGY AND WATER QUALITY** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |
| **LAND USE AND PLANNING** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |
| **NOISE** | | | |
| **MM NOI-1 Construction Noise Management Plan.** The Beach Cities Health District (BCHD) shall prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions, in accordance with Torrance Municipal Code (TMC) Section 46.3.1. The Construction Noise Management Plan would address noise and vibration impacts and identify measures that would be used to reduce impacts. At a minimum measures would include:<br>• Construction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday in accordance with Redondo Beach Municipal Code (RBMC) Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1.<br>• BCHD and its contractors and subcontractors shall coordinate approvals with the City of Redondo Beach and the City of Torrance and construct noise barriers to reduce noise levels to on- and off-site sensitive receptors, where feasible: | Prepare and implement the Construction Noise Management Plan.<br>Prepare and distribute notices to residents and businesses located within a 0.25-mile radius of the Project site.<br><br>Monitor noise and vibration resulting from construction activities. | BCHD responsible for preparing the plan.<br><br>Construction Contractor responsible for implementing plan. | BCHD responsible for Construction Contractor oversight.<br>City of Redondo Beach and City of Torrance Building & Safety Division and Permit Compliance Staff responsible for enforcement actions, if necessary, within their respective jurisdictions. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| ○ During Phase 1, noise barriers containing sound-absorbing materials would be constructed to a height that blocks the line-of-sight to sensitive receptors to the maximum extent feasible taking into account environmental constraints (e.g., wind loading, property ownership, etc.).<br>○ During Phase 2, noise barriers containing sound-absorbing materials would be constructed to a height that blocks the line-of-sight to sensitive receptors to the maximum extent feasible taking into account environmental constraints (e.g., wind loading, property ownership, etc.).<br>• BCHD's construction contracts shall require implementation of the following construction best management practices (BMPs) by all construction contractors and subcontractors working in or around the Project site to reduce construction noise levels:<br>○ BCHD and its contractors and subcontractors shall ensure that construction equipment is properly muffled according to manufactures specifications or as required by the Redondo Beach and City of Torrance Building & Safety Division, whichever is the more stringent.<br>○ BCHD and its contractors and subcontractors shall use electrically powered tools and facilities to the maximum extent feasible. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.<br>○ BCHD and its contractors and subcontractors shall place noise-generating construction equipment and locate construction staging areas away from on-site and off-site sensitive uses (e.g., centrally on the existing campus), where feasible, to the satisfaction of the Redondo Beach and Torrance Building & Safety Divisions.<br>• BCHD's construction contracts shall include the requirement that construction staging areas, construction worker parking and the operation of earthmoving equipment within the Project site, are located as far away from noise-sensitive sites as feasible. Contract provisions incorporating the above requirements shall be included as part of the construction documents, which shall be reviewed and approved by the | Provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. | | |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
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| City of Redondo Beach and Torrance Building & Safety Divisions prior to issuance of demolition or grading permits.<br>• BCHD's construction contracts shall include the requirement that haul trucks remain on the designated haul routes identified in the Redondo Beach and Torrance General Plans. Further, haul trucks should attempt to operate in traffic lanes that are located at the greatest distance from sensitive receptors, typically the lane nearest the roadway centerline on a four-lane roadway. Contract specifications shall be included in the proposed Project's construction documents, which shall be reviewed by the Redondo Beach and Torrance Building & Safety Divisions prior to issuance of demolition or grading permits.<br>At least 1 month prior to the initiation of construction-related activities during Phase 1 and Phase 2, BCHD shall prepare and distribute notices to residents and businesses located within a 0.25-mile radius of the Project site. At a minimum, the notices shall describe the overall construction schedule, advise residents, business owners, and employees of increased construction-related noise.<br>During construction, BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues. | | | |
| **MM NOI-2 Haul and Delivery Truck Operations.** Where feasible, haul and delivery truck operations associated with Phase 1 and Phase 2 development would enter and exit the Project site utilizing Lane 1 (the lane farthest from residences) along the given haul route. | Haul and delivery trucks use Lane 1 as a haul route. | BCHD and Construction Contractor. | BCHD responsible for Construction Contractor oversight. |
| **MM NOI-3a Delivery Truck Hours and Idling.** Deliveries from heavy-duty trucks, including refrigerator trucks, trash and recycling pick-ups, and parking lot sweeping, shall be restricted to daytime operating hours (7:00 a.m. to 4:00 p.m.); idling longer than 5 minutes in the same period shall be prohibited. | Restrict deliveries to daytime operating hours and idling no longer than 5 minutes. | BCHD responsible ensuring compliance with delivery truck | City of Redondo Beach and City of Torrance responsible |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| | | hours and idling requirements. | for enforcement actions, if necessary, within their respective jurisdictions. |
| **MM NOI-3b Events Management Plan.** The Beach Cities Health District (BCHD) shall prepare an Event Management Plan, which shall include, but is not limited to, establishment of procedures to limit noise generated by operations on the proposed BCHD Healthy Living Campus, particularly for outdoor events. The Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC). Limitations on outdoor events shall include prohibiting the use of amplification systems for outdoor events after 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria and review of the proposed sound system by a qualified acoustical engineer to ensure that event set ups would meet the acceptable exterior noise criteria of 50 to 55 A-weighted decibels (dBA) consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2. | Prepare and implement an Event Management Plan. | BCHD responsible for preparing and implementing the plan. | City of Redondo Beach and City of Torrance responsible for enforcement actions, if necessary, within their respective jurisdictions. |
| **MM NOI-3c Outdoor Pool Activities.** The Aquatics Center, specifically the outdoor pool and deck area, would close operations by 10:00 p.m. to comply with Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC) lower nighttime noise level criteria. | Close outdoor pool area by 10:00 p.m. | BCHD responsible for ensuring compliance with operating hours for the Aquatics Center. | City of Redondo Beach and City of Torrance responsible for enforcement actions, if necessary, within their respective jurisdictions. |
| **POPULATION AND HOUSING** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |
| **PUBLIC SERVICES** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |
| **TRANSPORTATION** | | | |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| **MM T-1 Transportation Demand Management (TDM) Plan.** The Beach Cities Health District (BCHD) would prepare and implement a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors. The TDM plan would be prepared by a qualified transportation engineer/planner and overseen by a TDM Coordinator to be designated by BCHD. The TDM plan would be developed prior to the issuance of a Conditional Use Permit (CUP) for Phase 1 of the proposed Project and would be continuously maintained and adjusted as needed.<br><br>The BCHD TDM Coordinator would monitor employee, tenant, and visitor mode share with annual surveys and develop annual reports for submittal to the BCHD Board of Directors. The surveys shall capture trip origin data, travel mode, rideshare (e.g., number of people in the party), and other key data and indicators for TDM program performance relative to vehicle miles traveled (VMT) (e.g., employee incentives for bicycling to work). The BCHD TDM Coordinator would ensure that monitoring efforts capture all BCHD-related travel behavior. Annual monitoring reports would include trip length surveys completed at least biannually by a sample of BCHD employees and tenants by BCHD employees (e.g., trip origin data collection). Survey results would be used to determine the appropriate TDM measures to employ in the coming year to maximize reductions in VMT per capita, champion transit and alternative mode transportation to BCHD employees, develop appropriate incentives to increase BCHD's transit mode share incrementally over time, and develop effective marketing tools to advertise transit and non-vehicular travel mode availability and incentives.<br><br>Each annual TDM Program monitoring report would:<br>• Describe the TDM efforts in place at the time to reduce vehicular trips;<br>• Summarize collected employee and tenant survey data and results;<br>• Evaluate survey data and results, comparing trends and annual changes;<br>• Evaluate change in available transportation infrastructure and programs serving the campus;<br>• Provide recommendations for adjustments to the TDM Program to adaptively manage VMT reductions for employees, tenants, and visitors.<br><br>The TDM Coordinator would oversee annual monitoring and reporting to evaluate the effectiveness of the TDM measures being implemented at the campus and recommend | Prepare and implement of a TDM plan. | BCHD-designated TDM Coordinator responsible for preparing and implementing plan. | City of Redondo Beach responsible for review and enforcement of the TDM plan consistent with RBMC Section 10-2.2406. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
|---|---|---|---|
| adjustments as needed to the TDM plan on an annual basis. Final annual reports and data (e.g., survey data) shall be shared with the cities of Redondo Beach and Torrance and made readily available for public review and use. Information regarding the TDM plan shall be distributed to all BCHD employees and tenants and shall be posted on BCHD's website and other marketing materials for BCHD visitors and updated annually as needed based on the annual reports.<br><br>The TDM Coordinator would consider a range of measures for the TDM plan to reduce employee and visitor VMT per capita, including, but not limited to, the following:<br><br>• Provide employee incentives to participate in a vanpool program and regularly advertise the opportunities to vanpool through a variety of employee communication formats.<br><br>• Partner with rideshare companies such as Uber or Lyft to guarantee availability of an emergency ride home or provide access to BCHD vehicles for this purpose.<br><br>• Offer employee TDM benefits for use of active transportation commuter modes, including ridesharing, transit, bicycling, walking, carpool/vanpool, etc. Incentives for BCHD employees could include flexible scheduling or options for telecommuting.<br><br>• Maximize opportunities for BCHD employees to telecommute as part of regular scheduling.<br><br>• Provide a transportation information center and wayfinding signage for nearby Beach Cities Transit Line 102 bus stops.<br><br>• Expand the proposed onsite bicycle facilities (i.e., shower, racks, and lockers) for BCHD employees in an amount and location informed by annual employee surveys and monitoring reports.<br><br>• Encourage bicycles as a primary commute mode for employees and provide incentives for biking to work, including providing free or discounted equipment to employees such as helmets, locks, bicycle commuter gear, and bicycles (electric or non-electric).<br><br>• Coordinate with the cities of Redondo Beach and Torrance to identify and facilitate new bicycle paths between the campus and neighboring communities, particularly | | | |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
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| linkages to existing bicycle path segments. BCHD and the cities of Redondo Beach and Torrance shall ensure that all bicycle paths to the campus are well-signed, provide lighting, and are regularly patrolled by law enforcement.<br>• Provide commuter clubs for BCHD employees and campus visitors to support a collaborative approach to TDM.<br>• Maintain and expand onsite bicycle parking for BCHD visitors in an amount and location informed by visitor surveys and annual monitoring reports.<br>  o Maintain and expand short-term bicycle parking within the campus to meet changing demands evaluated in the TDM Program annual reports.<br>  o Provide well-lit, clearly signed, bicycle parking that is convenient and in close proximity to the Entry Plaza to encourage bicycling by visitors.<br>  o Provide secure short-term bicycle parking and/or a bicycle parking attendant, bicycle valet, or indoor bicycle parking facility to prevent theft and ensure parking availability for BCHD visitors.<br>  o Design bicycle racks with space-efficient configurations, such as vertically staggered racks and two-tier racks.<br>  o Provide a bicycle station at the campus as a part of the Metro Bike Share or a new bike share program specific to BCHD. Funding shall be determined based on the area required for the bicycle station. The bicycle share station shall be well-lit and located at a safe and convenient location adjacent to the Entry Plaza. | | | |
| **MM T-2 Construction Traffic and Access Management Plan.** Following preparation of the final design plan for Phase 1 of the proposed Project, the Beach Cities Health District (BCHD) shall expand upon the Construction Traffic Control Plan and prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be subject to review and approval by the California Department of Transportation (Caltrans), County Department of Transportation (DOT), and Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department prior | Prepare a Construction Traffic and Access Management Plan and submit to Caltrans, County DOT, Redondo Beach Public Works Department Engineering Division, and Torrance | BCHD responsible for preparing the plan.<br>Construction Contractor responsible for implementing the plan. | BCHD responsible for Construction Contractor oversight.<br>Caltrans, County DOT, Redondo Beach Public Works Department |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
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| to issuance of a Conditional Use Permit (CUP). The Construction Traffic and Access Management Plan shall be designed to:<br>• Prevent traffic impacts on the surrounding roadway network;<br>• Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable;<br>• Ensure safety for both construction workers and the surrounding community; and<br>• Prevent substantial truck traffic through residential neighborhoods.<br>The Plan shall, at a minimum, include the following:<br>• Designated haul routes consistent with the Redondo Beach and Torrance General Plan designations;<br>• On-site staging areas, which would avoid residential streets to the maximum extent feasible;<br>• Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction flaggers at the three driveways along North Prospect Avenue as well as the proposed driveways along Beryl Street and Flagler Lane) to address circulation requirements and public safety in accordance with the standards in the County DOT Area Traffic Control Handbooks;<br>• Emergency access provisions (i.e., North Prospect Avenue and Beryl Street);<br>• On-site construction crew parking to the maximum extent feasible; and<br>• Prohibition of crew parking in adjacent residential neighborhoods.<br>Ongoing Requirements throughout the duration of construction:<br>• A detailed Construction Traffic Control Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. Such plans shall be reviewed and approved by the Redondo Beach Community Development Department, Redondo Beach Public Works Department, and Torrance Community Development Department prior to issuance of a demolition, | Community Development Department. | | Engineering Division, and Torrance Community Development Department enforcement actions, if necessary, within the purview of their jurisdictional authorities. |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
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| excavation, grading, or building permit and implemented in accordance with this approval.<br>• Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed contingent upon the issuance of an after-hours construction permit from the Redondo Beach Public Works Department Engineering Division and Torrance Community Development Department.<br>• Streets and equipment shall be cleaned in accordance with established Redondo Beach and Torrance Public Works Department requirements.<br>• Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself.<br>• Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current City of Redondo Beach permit.<br>Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction<br>• Prior to implementation of Phase 1 and Phase 2 of proposed Project, BCHD shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, and media listing/notification) as well as provide a call line for complaints and concerns regarding construction traffic.<br>• BCHD shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, Redondo Beach Fire Department [RBFD], Redondo Beach Police Department [RBPD], Torrance Fire Department [TFD], and Torrance Police Department [TPD], Redondo Beach Public Works Department Engineering Division, and Torrance Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet prior to Phase 1 and Phase 2 of Project implementation. | | | |

**Table 11-1. Mitigation Monitoring and Reporting Program**

| Avoidance and Minimization Measure | Monitoring/ Reporting Action | Responsible/ Monitoring Party | Enforcement Agency |
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| • BCHD shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks or longer per each submittal.<br>• BCHD shall obtain approval from the cities of Redondo Beach and Torrance of any haul routes for earth, concrete, or construction materials and equipment hauling.<br>• BCHD shall obtain an Excavation Permit, Street/Lane Closure Permit, Sewer Permit, Demolition Permit, and any other applicable permits for construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way. | | | |
| **MM T-3 Relocation of Beach Cities Transit Line 102.** To implement the proposed one-way driveway and pick-up/drop-off zone on Flagler Lot, the Beach Cities Health District (BCHD) shall work with the Redondo Beach Community Services Department Transit Division to relocate the existing Beach Cities Transit Line 102 northbound bus stop along eastbound Beryl Street. The bus stop shall be located along the south side of Beryl Street between the proposed one-way driveway entrance to the west and the intersection with Flagler Lane to the east. All proposed transit stop improvements shall be incorporated into final plans and reviewed and approved by the Redondo Beach Community Services Department Transit Division prior to the issuance of permits for these improvements. | Plan relocation of Beach Cities Transit Line 102 and incorporate all proposed transit stop improvements into final plans for review and approval. | BCHD and Architect responsible for planning relocation.<br>BCHD responsible for implementing or funding relocation. | BCHD and Redondo Beach Community Services Department Transit Division responsible for review and approval of plan. |
| **UTILITIES AND SERVICE SYSTEMS** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |
| **CUMULATIVE IMPACTS** | | | |
| No avoidance and minimization measures for this impact area. | N/A | N/A | N/A |

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