October 2024 | Final Program Environmental Impact Report
State Clearinghouse No. 2023050732

REDONDO BEACH FOCUSED GENERAL PLAN UPDATE, ZONING ORDINANCE UPDATE, AND LOCAL COASTAL PROGRAM AMENDMENT

City of Redondo Beach

Prepared for:

City of Redondo Beach

Contact: Marc Wiener, Community Development Director

Sean Scully, Planning Manager

415 Diamond Street

Redondo Beach, California 90277

310.318.0637

Prepared by:

PlaceWorks

Contact: Mark Teague, Principal

3 MacArthur Place, Suite 1100

Santa Ana, California 92707

714.966.9220

info@placeworks.com

www.placeworks.com

PLACEWORKS

Table of Contents

Section			Page
1.	**INTRODUCTION**		**1-1**
	1.1	INTRODUCTION	1-1
	1.2	FORMAT OF THE FPEIR	1-1
	1.3	CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES	1-2
2.	**RESPONSE TO COMMENTS**		**2-1**
	2.1	PROPOSED CHANGES TO GENERAL PLAN UPDATE	2-83
3.	**REVISIONS TO THE DRAFT PEIR**		**3-1**
	3.1	INTRODUCTION	3-1
	3.2	REVISIONS IN RESPONSE TO WRITTEN COMMENTS	3-1

APPENDICES

Appendix A Attachments to Comment Letter A3
Appendix B Attachments to Comment Letter A4
Appendix C Mitigation Monitoring and Reporting Program

LIST OF TABLES

Table		Page
Table 2-1	List of Commenters	2-1

Table of Contents

This page intentionally left blank.

1. Introduction

1.1 INTRODUCTION

This Final Program Environmental Impact Report (FPEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the FPEIR shall consist of:

(a) The Draft Program Environmental Impact Report (DPEIR) or a revision of the Draft;

(b) Comments and recommendations received on the DPEIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies commenting on the DPEIR;

(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.

This document contains responses to comments received during the public review period on the DPEIR for the Redondo Beach Focused General Plan Update, Zoning Ordinance Updates, and Local Coastal Program Amendment, which began August 1, 2024, and closed September 16, 2024. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency ("City of Redondo Beach" or "City"). This document and the circulated DPEIR and Mitigation Monitoring and Reporting Program (MMRP) comprise the FPEIR, in accordance with CEQA Guidelines, Section 15132. The MMRP is included as Appendix C to this FPEIR.

1.2 FORMAT OF THE FPEIR

This document is organized as follows.

Section 1, Introduction. This section describes the relevant CEQA requirements for and contents of this FPEIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the DPEIR, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A1 through A3 for letters received from agencies, O1 through O3 for letters received from organizations, and R1 through R7 for letters received from community members). Individual comments within each comment letter have also been numbered, and each comment letter is followed by responses that reference the corresponding comment number.

Section 3. Revisions to the Draft PEIR. This section contains revisions to the DPEIR's text and figures proposed as a result of the comments received by agencies and interested persons, as described in Section 2, and/or errors and omissions discovered subsequent to release of the DPEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FPEIR. The City of Redondo Beach staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DPEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DPEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review of and comments on DPEIRs should be

> ... on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which 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. …CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. 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.

CEQA Guidelines Section 15204 (c) further advises, "Reviewers 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." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to comments submitted by public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FPEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DPEIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Redondo Beach) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DPEIR and prepare written responses. This section provides all comments received on the DPEIR and the City's responses to each comment. Comment letters and specific comments within those comment letters are given letters and numbers for reference purposes. Where sections of the DPEIR are excerpted in this document, the sections are shown indented. Changes to the DPEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

Table 2-1, *List of Commenters,* provides a list of agencies and persons that submitted comments on the DPEIR and the General Plan Update during the public review period held between August 1, 2024 through September 16, 2024, and Planning Commission hearings held on September 19, 2024. In addition to the comment letters received on the DPEIR, this section of the FPEIR also notes the recommendations from planning staff on proposed changes to the General Plan Update and provides responses on the effect of the proposed changes to conclusions presented in the DPEIR.

Table 2-1 List of Commenters

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies			
A1	California Coastal Commission	8/7/24	2-3
A2	Los Angeles County Airport Land Use Commission	8/15/24	2-5
A3	California Geological Survey	9/6/24	2-7
A4	Beach Cities Health District	9/11/24	2-14
A5	Los Angeles County Metropolitan Transportation Authority	9/16/24	2-38
Organizations			
O1	Morongo Band of Mission Indians	8/16/24	2-44
O2	StopBCHD	9/20/24	2-46
O3	StopBCHD	9/19/24	2-50
O4	Mark Nelson on behalf of StopBCHD	9/17/24	2-58
O5	Mark Nelson on behalf of StopBCHD	9/17/24	2-61
O6	Mark Nelson on behalf of StopBCHD	9/17/24	2-63

2. Response to Comments

Table 2-1 List of Commenters

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Residents			
R1	Geoff Gilber	8/15/24	2-65
R2	Mark Nelson	8/15/24	2-68
R3	Mark Nelson	8/15/24	2-71
R4	Mark Nelson	8/15/24	2-73
R5	Mark Nelson `	8/19/24	2-75
R6	Frank Briganti	8/15/24	2-78
R7	Charlie S	8/15/24	2-80

LETTER A1 – California Coastal Commission

Comment Letter A1

From: Seifert, Chloe@Coastal <chloe.seifert@coastal.ca.gov>
Sent: Wednesday, August 7, 2024 10:14 AM
To: Sean Scully <Sean.Scully@redondo.org>
Cc: Marc Wiener <Marc.Wiener@redondo.org>; Dobson, Amber@Coastal <amber.dobson@coastal.ca.gov>
Subject: Draft EIR (General Plan Update)

CAUTION: Email is from an external source; ***Stop, Look, and Think*** *before opening attachments or links.*

Good morning Sean,

Staff received the draft EIR notice for the City of Redondo's General Plan update. The description suggests some of the changes will eventually be applied to the LCP. C you share the draft General Plan updates (or the draft EIR, if the updates aren't ready to be shared)? We'd appreciate the opportunity for a quick preliminary look and discussion.

Thanks!
Chloe Seifert | Coastal Program Analyst
CALIFORNIA COASTAL COMMISSION
South Coast District Office
301 E. Ocean Blvd, Suite 300
Long Beach, CA 90802
(562) 590-5071

A1-1

Please note all Commission offices are open weekdays from 8am to 5pm, but public counter hours may be ***limited to appointment only****. In addition to appointments in our offices, Commission staff is available by phone, email, and regular mail. Please make sure to send a copy of all correspondence or other documents electronically b email to the relevant Commission staff, in addition to the regular means required by regulations or statute. If you are not sure who to contact, please consult the Distric and Programs Contact list.*

Please note that email correspondence with the City of Redondo Beach, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt. The City of Redondo Beach shall not be responsible for any claims, losses or damages resulting from the use of digital data that may be contained in this email.

2. Response to Comments

A1. Response to Comments from the California Coastal Commission, dated August 7, 2024.

A1-1 This comment confirms receipt of the notice for the DPEIR. The commenter requests to view the DPEIR and General Plan Update as they relate to changes in the Local Coastal Program. The City provided the commenter with the available links to the DPEIR, draft General Plan Update, and draft Local Coastal Program and Coastal Zoning ordinance amendments. This comment does not raise any environmental issue regarding the adequacy of the DPEIR; therefore, no further response is required pursuant to CEQA. The comment is acknowledged for the record.

LETTER A2 – Los Angeles County Airport Land Use Commission

LOS ANGELES COUNTY AIRPORT LAND USE COMMISSION

PAM O'CONNOR, Chair
DAVID W. LOUIE, Vice Chair
YOLANDA DUARTE-WHITE, Commissioner
ELVIN W. MOON, Commissioner
MICHAEL R. HASTINGS, Commissioner

August 15, 2024

City of Redondo Beach Community Development Department
ATTN: Marc Wiener, Community Development Director
415 Diamond Street
Redondo Beach, CA 90277

Comment Letter A2-1

SUBJECT: Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment

Dear Mr. Wiener:

Thank you for the opportunity to comment on the above referenced project. Staff of the Los Angeles County Airport Land Use Commission (ALUC) reviewed the submitted document and has the following comments.

The project is not located within an Airport Influence Area (AIA) of any airport in Los Angeles County. The nearest AIA is Torrance Municipal Airport, which is approximately 1.6 miles to the southeast. Therefore, the proposed project is not subject to ALUC review in accordance with Section 21676 of the California Public Utilities Code. There is no need for further review and staff has no additional comments on the project. A2-1

If you have any questions regarding this matter, please contact Lauren De La Cruz at (213) 974-6432 or via email at ldelacruz@planning.lacounty.gov, between 7:30 am and 5:30 PM, Monday through Thursday. Our office is closed on Fridays.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP
Director

A. Bruce Durbin
Digitally signed by A. Bruce Durbin
Date: 2024.08.14 08:08:39 -07'00'

Bruce Durbin, Supervising Regional Planner
Ordinance Studies Section/ALUC Staff

LA COUNTY PLANNING

320 West Temple Street, Los Angeles, CA 90012 • 213-974-6411 • TDD: 213-617-2292
@LACDRP • planning.lacounty.gov

2. Response to Comments

A2. Response to Comments from Los Angeles County Airport Land Use Commission, dated August, 15, 2024.

A2-1 The commenter acknowledges the DPEIR and appreciates the opportunity to provide comments on the proposed project. The comment confirms that the proposed project is not within an Airport Influence Area of any airport in Los Angeles County and is not subject to review, which is consistent with the findings disclosed in the DPEIR. This comment does not raise any environmental issue regarding the adequacy of the DPEIR and the comment is acknowledged for the record.

LETTER A3 – California Geological Survey

California
Department of Conservation
California Geological Survey

Gavin Newsom, Governor
Gabe Tiffany, Acting Director

Comment Letter A3

September 6, 2024

Nick Graehl
California Geological Survey
715 P Street, MS 1901, Sacramento, CA 95814

To whom it may concern:

The California Geological Survey has reviewed the 2024 Draft Program Environmental Impact Report for Redondo Beach and has provided the following comments for your consideration. These comments are intended to offer insights and recommendations to ensure that the environmental impact assessment accurately reflects tsunami considerations pertinent to the project. Should you have any questions or require further clarification, do not hesitate to reach out. A3-1

1. Page 5.6-5 bullet Title 10 Chapter 5. 1542.
    a. Instead of an elevation datum (i.e., 15 feet MSL), consider having the applicant review the State Tsunami Hazard Area maps (https://www.conservation.ca.gov/cgs/tsunami/maps) and ASCE Tsunami Design Zone maps (https://asce7tsunami.online/) to identify their appropriate tsunami hazard.
2. Page 5.9-13 Chapter 5, Coastal Land Use Plan Implementing Ordinance
    a. Refer to comment 1a about using an elevation datum to define areas that require an application for development.

A3-2

3. Page 5.9-23 Figure 5.9-3 Tsunami Hazards Areas in Redondo Beach
    a. Confirm that the mapped tsunami area shown on this figure is the California Geological Survey's 2021 Tsunami Hazard Area Map for Los Angels County.
        i. State of California, 2021. Tsunami Hazard Area Map, Los Angeles County; produced by the California Geological Survey and the California Governor's Office of Emergency Services; dated 2021, displayed at multiple scales.
    b. If it is indeed the State of California (2021) map, then update the reference within the figure (California Geological Survey 2021).
    c. For clarification, the Tsunami Hazard Area maps are not inundation zones. They are intended for local jurisdictional, coastal evacuation planning uses only. They are not legal documents and do not meet disclosure requirements for real estate transactions nor for any other regulatory purpose. See the Tsunami Hazard Area

A3-3

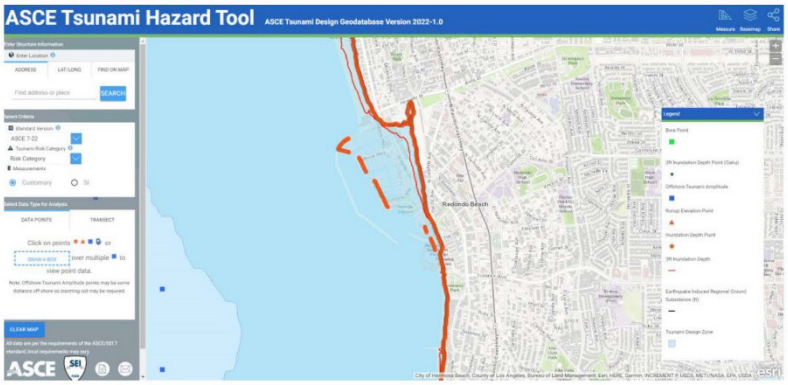
State of California Natural Resources Agency | Department of Conservation
Office of the State Geologist, 715 P Street, MS 1901, Sacramento, CA 95814
conservation.ca.gov | T: (916) 445-1825

2. Response to Comments

online metadata for additional information.
https://www.conservation.ca.gov/cgs/tsunami/maps

A3-3 Cont'

d. Consider including a Figure for the ASCE Tsunami Design Zones at Redondo Beach.

i. 

4. Page 5.9-25 Tsunami
   a. Consider using the term "Tsunami Hazard Area" to describe the tsunami area/maps, as these are not inundation maps. Refer to comment 3c for more information.
   b. Update reference to Tsunami Hazard Area Map for Los Angeles (see 3ai).
   c. Please refer to the following table for distant and local tsunami source information:

A3-4

Tsunami Source Scenario Model Results for Los Angeles County

2019 UPDATE - Near shore tsunami heights (flow depths) for both local and distant source scenarios, in FEET above Mean Sea Level.
NOTE: The projections do not include any adjustments for ambient conditions, such as storm surge and tidal fluctuations, and model error (it is very important to note this difference, as those numbers can increase the projected water height during an event).

	TSUNAMI SOURCES	Approximate Travel Time	Leo Carrillo State Beach	Malibu Beach/ Lagoon	Santa Monica Pier	Marina Del Rey	Manhattan Beach	Redondo Beach	Palos Verdes Hills	San Pedro-POLA	Long Beach Middle Harbor-POLB	Long Beach	Naples-Alamitos Bay	Catalina Avalon	Catalina Two Harbors
Local Sources	M7 Newport Inglewood Fault	10-15min								2	3	3	3		
	M7.5 Channel Isl. Thrust Fault	10-15min	4		3	2	3	3	3						
	M7.2 Anacapa Dume Thrust Fault	10-15min		8	6	3	6	6	5						
	Palos Verdes Landslide 1	10-15min			7	4	6	10	20	4	4	4	5		
	Palos Verdes Landslide 2	10-15min								6	5	5	5	12	16
	M7.1 Santa Monica Thrust Fault	10-15min		4	5	3	3	4	3						
	M7.7 Catalina Fault	15-20min	4	6	6	5	6	6	6	5	7	7	7	27	10
Distant Sources	M9 Cascadia-full rupture	2hr			4	4	4	4	3	3	4	4	4	3	3
	M9.2 Alaska 1964 EQ	6hr	5	5	7	6	5	4	4	8	7	9	8	4	4
	M9.3 Alaska-Fast Aleutians	6hr	7	8	14	14	9	8	7	9	8	12	13	-	-
	M8.9 Central Aleutians I	6hr	3		5	5	4	4	4	4	5	5	4		
	M8.9 Central Aleutians II	6hr			3	4	3	4	3	3	3	4	4		
	M9.2 Central Aleutians III	6hr	6	7	10	10	7	6	5	13	10	11	13	5	5
	M9 Kamchatka 1952 EQ	9hr	3												
	M8.8 Kurill Islands II	10hr			3	2	3	2	2	2	3	3	3		
	M8.8 Kurill Islands III	10hr			3	3	3	3	2	2	3	3	3		
	M8.8 Kurill Islands IV	10hr			3	3	3	3	2	2	3	3	3		
	M8.8 Japan II	11hr			3	3	3	3	2	2	3	3	3		
	M9.5 Chile 1960 EQ	13hr			5	5	4	4	4	4	7	9	10	3	3
	M9.4 Chile North	13hr	5	5	5	6	5	5	5	4	10	9	11	4	5
	Maximum Runup - Local Source		**4**	**9**	**8**	**5**	**7**	**11**	**24**	**7**	**8**	**8**	**8**	**30**	**18**
	Maximum Runup - Distant Source		**7**	**9**	**11**	**11**	**8**	**7**	**5**	**15**	**12**	**13**	**15**	**7**	**7**
	UPDATED Maximum Runup - Distant Source		**8**	**9**	**15**	**15**	**10**	**9**	**9**	**10**	**10**	**14**	**15**	-	-

2019 Updated Source Information

A3-4 Cont'

d.
e. Please update distant/local source text in this section to align with this table.
f. Consider adding a section here on ASCE Chapter 6 standards, as they are used in the CBC for specific risk category structures.

A3-5

5. Page 5.9-26 Seiche
   a. Consider that seiche may occur within King Harbor.
6. Page 5.9-40 Pollutant Release from Dam Inundation, Tsunamis, and Seiches
   a. See comment 4a on "Tsunami Hazard Area".
   b. CGS has completed Probabilistic Tsunami Hazard Analyses (PTHA) at several return periods (i.e., 72, 100, 200, 475, 975, 2475, 3000-year average return periods) found online here: https://www.conservation.ca.gov/cgs/tsunami/reports#other

Other Reports and Data

Community exposure to tsunami hazards in California (PDF) - Wood, N., Ratliff, J., and Peters, J., 2013, U.S. Geological Survey Scientific Investigations Report 2012-5222, 49 p.

Probabilistic tsunami hazard analysis (PTHA) data for California (2023 release) - This dataset represents the modeled tsunami flood hazard for California, originating from tsunami sources located in the Pacific Ocean, and covers a range of average return periods. For more information, please see the **PTHA data "Read Me" file** and the **AECOM report, *Probabilistic Tsunami Hazard Maps for the State of California (Phase 2)***.

⚠ THESE DATA ARE CONSIDERED "UNVERIFIED" WITH UNKNOWN ERRORS. Where errors exist, they are likely related to inaccuracies within the digital elevation model used during the numerical tsunami modeling process.

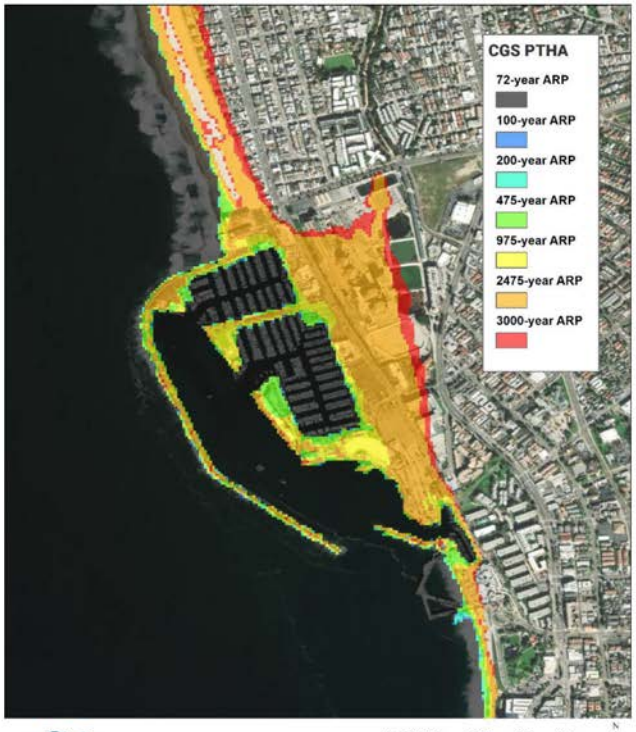
⚠ DO NOT USE THESE DATA FOR TSUNAMI EVACUATION PLANNING. Tsunami Hazard Area maps for evacuation planning are available at the **California Tsunami Maps web page**.

A3-6

c.
d. The PTHA data can be used to assess the impact of tsunami at Redondo Beach at each return period.

Page 3 of 5

2. Response to Comments



Redondo Beach Tsunami Hazard Levels

e.
f. The National Tsunami Warning Center (NTWC) provides tsunami alert information to the public. NTWC does not provide information on evacuation orders/warnings; that is done by local officials. Consider modifying text to clarify the difference.

7. Page 5.9-43 References
   a. Update tsunami map reference (see comment 3ai).
   b. Consider adding a reference to the ASCE Chapter 6 tsunami standards and online ASCE Tsunami Hazard Tool (https://asce7tsunami.online/)
8. Page 5.9-44 References

   Los Angeles County Office of Emergency Management (LACOES). 2006, March 29. Los Angeles County Operational Area Emergency Response Plan, Tsunami Annex. https://ceo.lacounty.gov/wp-content/uploads/OEM/Tsunami%20Annex.pdf

   a.
   b. Consider using a newer LA County Office of EM's OA Emergency Response Plan Tsunami annex, *if available*. The 2006 Tsunami Annex predates both of our CGS 2021 Tsunami Hazard Area maps and 2009 Tsunami Inundation Maps.
9. Page 13-3 Reference

A3-6 Cont'

A3-7

A3-8

A3-9

Page 4 of 5

California Department of Conservation (CDOC). 2009. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles.

A3-9 Cont'

a.
b. Update reference (see comment 3ai)

Very respectfully,



Nick Graehl
Engineering Geologist | Tsunami Unit
California Geological Survey
715 P St, MS-1901 Sacramento, CA 95814
M: (661) 549-7788 W: (916) 879-1850
Nicholas.Graehl@conservation.ca.gov
State Tsunami Info: www.tsunami.ca.gov

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

2. Response to Comments

A3. Response to Comments from California Geological Survey, dated September, 6, 2024.

A3-1 This comment introduces a comment letter submitted by the California Geological Survey (CGS) that provides recommendations regarding tsunami considerations associated with the proposed project. Responses to these topics are provided below. This specific comment does not raise any environmental issue regarding the adequacy of the DPEIR; therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and comments on tsunami considerations are further discussed below.

A3-2 This comment points to the regulatory background of Section 5.6, *Geology and Soils*, of the DPEIR, and recommends that future applicants of development projects facilitated by the proposed project also review the State Tsunami Hazard Area Maps and ASCE Tsunami Design zone maps in addition to Title 10, Chapter 5.1542, of the City's Municipal Code. The information presented is acknowledged for the record, and additional references regarding the State Tsunami Hazard Area maps and ASCE Tsunami Design Zone maps have been added as part of the FPEIR (see Section 3, *Revisions to the Draft PEIR*). The proposed project is a regulatory document that sets the framework for future growth and development in the city but does not directly result in development. Future development would be required to undergo the necessary approvals and would undergo individual project-level analysis under CEQA as appropriate. The addition of this source does not change the conclusions reached by the DPEIR.

A3-3 This comment requests clarification for the reference used in Figure 5.9-3, Tsunami Hazards Areas in Redondo Beach. The reference to CGS 2009 for the Figure 5.9-3 in the DPEIR has been corrected in the FPEIR to reference the CGS 2021 source for identifying Tsunami Hazard Zones (see Section 3, *Revisions to the Draft PEIR*). The correction of the source does not change the conclusions reached by the DPEIR. The commenter provides links to maps and data to prepare the recommended map to be included in the DPEIR. The commenter also recommends including a figure for the ASCE Tsunami Design Zones at Redondo Beach. An additional figure for the ASCE Tsunami Design Zones at Redondo Beach has been added as part of the FPEIR (see Section 3, *Revisions to the Draft PEIR*). No additional environmental issues were raised regarding the adequacy of the DPEIR. Therefore, no further response is warranted.

A3-4 This comment recommends using the term "Tsunami Hazard Area" instead of inundation to describe the tsunami area/maps. The comment also requests that the distant/local source text align with the table provided in the comment letter. The comment also suggests that a section on ASCE Chapter 6 standards be added in Section 5.9, *Hydrology and Water Quality*. ASCE Chapter 6 standards cover the design of buildings and other structures to withstand tsunami loads and effects. The General Plan Policy S-7.7 would require structures along the coast to be fortified against waves from a storm surge. Please see Section 3, *Revisions to the Draft PEIR,* for revisions made in response to this comment. The addition of this source does not change the conclusions reached by the DPEIR.

A3-5 This comment recommends considering that a seiche may occur in King Harbor. As discussed on page 5.9-40 of the DPEIR, King Harbor is in a tsunami hazard zone, and the city may be subject to impacts from seiches. The policies and regulations that reduce risks associated with tsunamis would also reduce risks from seiches. Therefore, the DPEIR contains sufficient analysis and no changes are necessary. The comment is acknowledged for the record.

A3-6 This comment provides a link for Probabilistic Tsunami Hazard Analysis (PHTA) that can be used to assess the impact of tsunamis. The comment also suggests that the text referring to the National Tsunami Warning Center (NTWC) be modified to make it clear that the NTWC does not provide information on evacuation orders/warnings. General Plan Policy S-5.2 would obtain information from the U.S. Tsunami Warning System and the Tsunami Ready Communities program to send evacuation notices to community members in the event of a tsunami. Additionally, the DPEIR references the National Weather Service rather than the NTWC. Therefore, the DPEIR provides accurate information regarding tsunami alert systems. No changes to the DPEIR are necessary. The comment is acknowledged for the record.

A3-7 This comment requests that the Tsunami map reference for Figure 5.9-3 be updated in the References section and recommends adding ASCE Chapter 6 tsunami standards and online ASCE Tsunami Hazard Tool. Please see Response to Comment A3-3, above, and Section 3, *Revisions to the Draft PEIR,* for revisions made to references as a response to this comment. The correction of the source does not change the conclusions reached by the DPEIR. The comment is acknowledged for the record.

A3-8 This comment suggests using a newer version of the Los Angeles County Office of Emergency Response Plan, Tsunami Annex, if available, rather than the reference cited in the DPEIR from 2006. The most recent version available is from 2018. Please see Section 3, *Revisions to the Draft PEIR,* for revisions made to references in response to this comment. The correction of the source does not change the conclusions reached by the DPEIR.

A3-9 This comment requests that the reference to the California Department of Conservation on DPEIR page 13-3 be updated to be consistent with the reference discussed in comment A3-3. Please see Section 3, *Revisions to the Draft PEIR,* for revisions made to references as a response to this comment. The correction of the source does not change the conclusions reached by the DPEIR.

2. Response to Comments

Letter A4 – Beach Cities Health District

Comment Letter A4

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

September 11, 2024

VIA E-MAIL AND

MESSENGER

City of Redondo Beach
Community Development Department, Door 2
415 Diamond Street
Redondo Beach, California 90277
Attn: Marc Wiener, Community Development Director
Sean Scully, Planning Manager

Email: GeneralPlanEIR@redondo.org

Re: Beach Cities Health District's Comment on Draft Program EIR
Redondo Beach Focused General Plan Update, Zoning Ordinance Update, and Local Coastal Program Amendment
(State Clearing House No. 2023050732)

Dear Mr. Wiener and Mr. Scully:

I am writing on behalf of Beach Cities Health District ("BCHD"), a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City of Redondo Beach (the "City"). BCHD appreciates this opportunity to submit comments on the Draft Program Environmental Impact Report ("DPEIR") prepared in connection with the Redondo Beach Focused General Plan Update, Zoning Ordinance Update, and Local Coastal Program Amendment ("Project" or "General Plan Update").

Initially, BCHD feels compelled to observe the volume and purported scope of the DPEIR – encompassing a main volume in excess of 700 pages, and nine appendices over 700 pages.[1] An extension of the review and comment period – currently set at nearly the bare minimum number of days – is warranted to facilitate a thorough, comprehensive, and meaningful reading and evaluation of the materials. A4-1

At the same time, it is readily evident from the limited review that has been possible under the given period, that the DPEIR fails to conform to the requirements of the California Environmental Quality Act ("CEQA") (Pub. Res. Code §§ 21000, et seq.), and the State of California Guidelines for CEQA (14 Cal. Code Regs §§15000 et seq.). The DPEIR is replete with several serious deficiencies that mandate correction before any consideration of the Project can take place. These deficiencies consist of both general and specific matters as further discussed

[1] The text of a draft EIR should ordinarily be less than 150 pages and, for projects of "unusual scope or complexity," should normally not exceed 300 pages. (14 Cal Code Regs §15141; see also Pub Res C §21003(b)–(c).)

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

below. Accordingly, BCHD requests that the City suspend any further consideration of the Project until the DPEIR can be revised and recirculated for public review and comment to fully disclose and analyze the potential impacts of the Project and fully consider feasible alternatives to the Project.

A4-1 Cont'

I. INTRODUCTION

CEQA calls for a thorough analysis of a project's potentially significant environmental impacts as well as feasible means to avoid or substantially lessen such impacts. To serve its important public purposes of informing the public and decision-makers of the consequences of its action, such a review must occur before approval of a project. Such review is particularly important where, as here, it is anticipated that the proposed Project will have substantial impacts on and conflict with the authorities of other public agencies.

As such, thorough identification of the proposed Project, and candid disclosure of all phases of the Project and its potential impacts, are essential to ensure that the proposed Project will be planned and implemented in conformity with established community plans and policies and that environmental review is conducted with full consideration of all potentially significant environmental impacts as well as mitigation measures and alternatives designed to address those impacts. In addition, it will be important to consider the impacts of the proposed Project on the BCHD's community, mission, facilities, and operations. The City must therefore provide a meaningful opportunity for informed public review of and comment on a well-defined "project."

While we recognize the effort that has gone into the preparation of the current DPEIR, it is apparent that the document does not provide the information, evidence, or analysis required under CEQA. The DPEIR thus fails to fulfill its critical role as mandated by CEQA in educating the public generally, other affected regulatory agencies and governments, or the officials and City Council, as to the potential environmental significance and impacts of the proposed Project.

A4-2

The necessary contents for an adequate Draft EIR are described in Public Resources Code § 21100. A Draft EIR must include "a detailed statement setting forth all of the following:

(1) All significant effects on the environment of the proposed project.

(2) In a separate section:

(A) Any significant effects on the environment that cannot be avoided if the project is implemented.

(B) Any significant effect on the environment that would be irreversible if the project is implemented.

(3) Mitigation measures proposed to minimize the significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

(4) Alternatives to the proposed project.

(5) The growth-inducing impacts of the proposed project."

Article 9 of the CEQA Guidelines further expands on the contents of Draft EIRs. Specifically, a Draft EIR must contain the information required by CEQA Guidelines sections 15122 through 15131. (CEQA Guidelines § 15120.) Those sections require, among others, adequate consideration and discussion of (1) the Project Description, (2) the Environmental Setting, (3) Significant Environmental Impacts, (4) Mitigation Measures, (5) Alternatives, and (6) Cumulative Impacts. A4-2 Cont'

As outlined in more detail below, the DPEIR fails to, among others: contain an adequate project description; properly identify the environmental setting; adequately assess the Project's potentially significant environmental effects, including those that cannot be avoided; and identify feasible mitigation measures and alternatives to avoid or substantially lessen the Project's significant environmental effects. It is therefore respectfully urged that the DPEIR be revised, corrected, and recirculated for public review and comment before the City proceeds with any further action on the proposed Project. A4-3

In addition, BCHD requests and expects that responses to each comment, whether in this letter or the exhibits attached hereto, will be provided as required by and in accordance with CEQA Guidelines section 15088.

II. THE DPEIR FAILS TO COMPLY WITH CEQA.

A. The DPEIR Does Not Provide A Full And Accurate Description Of The Project.

1. Deficient Project Description—In General

The DPEIR does not provide a full and accurate description of the "Project" as required by CEQA. (*See, e.g.*, CEQA Guidelines § 15124; *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376.) This deficiency undermines the document's compliance with CEQA guidelines and its effectiveness in informing the public and decision-makers about the potential environmental impacts of the Project. A4-4

An EIR must comprehensively review the proposed project in its entirety, considering all phases from planning to development and operation. This requirement reflects CEQA's definition of a "project" as the "whole of an action" that may result in a direct or reasonably foreseeable indirect physical change in the environment (Public Resources Code § 21065; CEQA Guidelines § 15378). The DPEIR falls short in this regard, failing to provide a complete and stable project description, which is essential for fulfilling CEQA's "public awareness" mandate. Specifically, portions of the General Plan Update were revised by the City's Planning Commission and an

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

revised General Plan Update reflecting those changes to the Project have yet to be released for public review.

In addition to being accurate and complete, a project description must be stable. (CEQA Guidelines § 15124; *County of Inyo v. City of Los Angeles* (1997) 71 Cal. App. 3d 185, 197.) Despite this, at its August 1, 2024 Special Meeting, the Planning Commission reached a consensus on several proposed changes to multiple Goals, Policies, and Implementation Measures within the Land Use and Open Space and Conservation Elements of the General Plan Update.[2] Per the staff report at the Planning Commission's August 15, 2024 meeting, the changed version of the General Plan Update, incorporating the Planning Commission's proposed modifications, is not scheduled to become publicly available until the Planning Commission's September 19, 2024 public hearing on the Project[3] – which is after the public's deadline to respond to the DPEIR. The public must be given the opportunity to comment on changes to the Project. (See *Save Our Capitol! v Department of Gen. Servs.* (2023) 87 Cal.App.5th 655, 676.)

A4-4 Cont'

Notably, at the August 15 Planning Commission meeting, Commissioner Sheila Lamb revealed her intent to propose additional changes to the City's Zoning Code relating the zoning and land use designation of the Campus.[4] However, she did not specify the proposed changes at that time, intimating that she preferred to introduce these changes at the next Planning Commission meeting – after the public review period for the EIR has closed – so that they may be included without environmental review and subject to public review and comment. This approach raises concerns about transparency and the adequacy of public participation in the environmental review process.

These ongoing revisions indicate that the General Plan Update is still in development, making it premature for the City to proceed with CEQA review at this stage. Such "shifting sands" in the project description mislead the public and undermine the EIR process. As noted in *County of Inyo v. City of Los Angeles*, *supra*, when an EIR contains an unstable or shifting project description, meaningful public participation is hindered. The lead agency's failure to provide a stable and consistent project description constitutes a prejudicial abuse of discretion under CEQA

[2] The URL to the video of the Planning Commission's proposed changes to the General Plan update is as follows: https://youtu.be/ph7ZtvCVwJE?t=9007.

[3] The URL to the referenced staff report is as follows: https://redondo.legistar.com/View.ashx?M=PA&ID=1207077&GUID=50B43972-9154-49AF-9FC9-EDCBBFA1A695. The referenced language can be found on page 77 of the agenda packet (page 2 of the staff report).

[4] The URL to the video of the comments made by Commissioner Lamb is as follows: https://youtu.be/eylAOQHWL5o?t=15353.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

2. Response to Comments

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

and precludes this EIR from serving as the environmental basis for the proposed discretionary actions.

Given that the Project is not yet completely defined, the City must pause the CEQA review process until a complete and stable project description is available. This will ensure that the DPEIR can accurately assess the potential environmental impacts of the General Plan Update, as required by CEQA, and that the public and decision-makers have the necessary information to provide meaningful input.

A4-4 Cont'

2. Specific Comments on "Project Description" Text

The following comments and questions refer to specific portions or pages of Chapter 5 of the DPEIR:

a. Pp. 3-23 to 3-25 – Inconsistencies in FAR Application and Inadequate General Plan Buildout

BCHD's 9.7-acre campus at 514 North Prospect Avenue (the "Campus") is designated as public/institutional (PI) land use in the Project. (DPEIR, p. 3-20, Figure 3-5.) The Project's proposed land uses for each designation are detailed in Table 3-2. Table 3-2 sets a new maximum Floor Area Ratio (FAR) of 0.75 for the Campus. However, the DPEIR describes a buildout scenario for the Campus that exceeds this proposed maximum FAR. Specifically, page 3-25 of the DPEIR outlines a buildout scenario for the Campus with a FAR of 0.85, surpassing the Project's maximum allowable FAR:[5]

> Growth for [BCHD] was projected consistent with the site development plan/ program for phases 1 and 2, as described in the project description of the 2021 certified Final Environmental Impact Report (SCH No. SCH Number 2019060258) in the buildout methodology for the General Plan Update, including the following assumptions (Phase 1: Assisted Living: 157 units (203,700 sf); Memory Care: 50,000 sf (120 beds); PACE: 14,000 sf; Community Services: 6,270 sf; Youth Wellness Center: 9,100 sf. Phase 2: Wellness Pavilion: 37,150 sf; Aquatics Center (indoor area): 24,000 sf; Center for Health and Fitness: 20,000 sf), resulting in a FAR of 0.85.

A4-5

The analyzed buildout scenario in the DPEIR appears to be tied to BCHD's Healthy Living Campus Master Plan. However, the defined Project prevents that very buildout scenario for the

[5] A similar paragraph is found in the DPEIR's Appendix, p. A-17.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

Campus. By analyzing a buildout scenario that exceeds the Project's maximum FAR for the Campus, the DPEIR assesses the impacts of something other than the actual Project. Consequently, it fails to evaluate the true environmental impacts of the Project itself. Further, the DPEIR lacks a clear explanation or rationale for applying a buildout scenario for the Campus that conflicts with the defined Project.

By not applying the Project's maximum FAR of 0.75 for the Campus in its buildout scenario, the DPEIR avoids addressing the likely loss of essential public services provided by BCHD at the Campus, such as healthcare services to the surrounding community and residential care facilities for the elderly and disabled. This omission leads to an incomplete analysis of the environmental impacts associated with the proposed General Plan Update, particularly regarding its effects on the BCHD and the community. All potentially significant environmental impacts related to the new maximum FAR of 0.75 for PI land use designations should have been analyzed but were not because it analyzed a buildout scenario for the Campus that the Project itself prohibits.

An accurate and complete project description is crucial for a proper evaluation of the potentially significant environmental impacts of the agency's actions. (*Silveira v. Las Gallinas Valley Sanitary Dist*. (1997) 54 Cal.App.4th 980, 990.) Only a precise project description allows affected parties and decision-makers to balance the proposal's benefits against its environmental costs, consider mitigation measures, and weigh alternatives. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193.)

A4-5
Cont'

The DPEIR erroneously redefines the scope of its analysis to a buildout scenario that is precluded by the defined Project, making it impossible for public agencies and concerned individuals to conduct an effective review or provide meaningful comments on the proposed Project. CEQA review cannot be adequately undertaken unless the City identifies a buildout scenario for the Project that reflects the true impacts of the proposed Project. The DPEIR must be revised to include a complete and accurate project description, incorporating all components of the Project, including the proposed FAR on PI in the buildout, to enable informed public and agency input.

The DPEIR fails to recognize, let alone analyze, all potentially significant environmental impacts of the proposed 0.75 FAR on PI land use designations. It must be revised to include a comprehensive analysis of both the direct and reasonably foreseeable indirect impacts of the proposed FAR. Alternatively, the scope of the DPEIR and General Plan Update must be expanded to include a detailed, evidence-based explanation justifying the buildout assumptions that exceed the Project's scope and limits. (CEQA Guidelines § 15125; *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310.)

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

b. Pp. 3-23 to 3-25 – Factual Inaccuracy in the DPEIR Regarding BCHD Healthy Living Campus FAR and Resulting Implications

The above-referenced paragraph on page 3-25 of the DPEIR also contains an inaccuracy regarding the FAR for the BCHD Healthy Living Campus. It outlines a buildout scenario for the Campus with a FAR of 0.85, which is purportedly based on the site development plan described in the certified Final Environmental Impact Report for the BCHD Healthy Living Campus Master Plan. However, the 0.85 FAR referenced in the DPEIR is incorrect. The EIR for the BCHD Healthy Living Campus Master Plan evaluated a proposed project with a FAR that exceeds the 0.85 stated in the DPEIR, even without accounting for the vacant Flagler lot. Importantly, if the City applied a FAR of 1.25, which is proposed for other public/institutional land use designations, this would adequately accommodate the BCHD Healthy Living Campus Master Plan project.

A4-5 Cont'

Because of this incorrect information, even if the City is correct in ignoring the Project's maximum FAR of 0.75 for the Campus in its analysis, the DPEIR incorrectly identified the proposed FAR in BCHD's proposed Campus project, as analyzed in its EIR for the BCHD Healthy Living Campus Master Plan. A proper environmental analysis under CEQA depends on accurate data and assumptions, and in this case, the study has been fundamentally flawed because it relies on inaccurate data and assumptions. As a result, the DPEIR must be revised, corrected, and recirculated for public review and comment before the City proceeds with any further action on the proposed Project. This step is essential to ensure that the public and decision-makers are fully informed about the true environmental impacts of the Project.

B. The DPEIR Fails To Acknowledge And Analyze Various Significant Environmental Impacts.[6]

Given the improper buildout methodology used in the DPEIR, assessing impacts related to any environmental resource topic is premature, either on a project or cumulative basis. The "whole" of the Project must be analyzed in an EIR. The "whole" of the project cannot be analyzed with an incorrect buildout methodology. As such, a corrected buildout must be provided before these topics can be properly analyzed and mitigated in a revised and recirculated DPEIR. (CEQA Guidelines § 15151 ["An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences" and that in reviewing an agency's efforts in preparing an EIR, courts look for "adequacy, completeness, and a good faith effort at full disclosure"]; *accord*, CEQA Guidelines § 15204(a) [requiring that a "good faith effort at full disclosure [be] made in the EIR."].)

A4-6

[6] This Section provides comments on both the Environmental Setting (Chapter 4) and Environmental Analysis (Chapter 5) of the DPEIR.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

The DPEIR must be revised and recirculated to contain a thorough analysis of all potentially significant impacts associated with all of the proposed Project's control measures as well as feasible mitigation measures and alternatives designed to avoid or substantially lessen those impacts.

The scope of the proposed DPEIR improperly excludes potentially significant impacts to, among other things, public services, population and housing, and land use and planning. Unless and until those areas are more fully addressed, the scope of the DPEIR is improperly limited and erroneously excludes areas requiring further assessment. In several respects, the DPEIR merely *assumes* the absence of potentially significant impacts, rather than factually demonstrating that significant impacts will not occur if the (unsettled) Project is adopted and implemented. This is insufficient under CEQA. (*City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398.)

A4-6 Con't

1. The DPEIR Fails To Evaluate the Impacts of the Project on Public Health Services.

Courts have held that an agency failed to proceed as required by law because the EIR's discussion and analysis of a mandatory EIR topic was nonexistent or so cursory it manifestly did not comply with the basic legal requirement that the issue be discussed and analyzed. (*See El Dorado Union High Sch. Dist. v City of Placerville* (1983) 144 Cal.App.3d 123, 132 [EIR contained no discussion of impacts on school district].) Here, the DPEIR wholly fails to address the impacts of the Project on public services provided by BCHD. In fact, the DPEIR conspicuously omits BCHD and public health from the list of "public services" within the Project area, while including things like library, school, fire, and police services. (DPEIR, p. 4-6, 5.13-1.)

BCHD is a public agency that provides preventive health services to South Bay residents, including those in the City. The City's proposed update to its General Plan Land Use Element affects BCHD's 9.7-acre Campus. The Campus is currently improved with medical offices, community wellness and memory care facilities, a maintenance building, and a parking structure. The Campus currently has a public or institutional (P) land use designation in the City's General Plan and is zoned as a community facility ("P-CF") under the City's zoning code. Currently, there is no specified maximum Floor Area Ratio ("FAR") for P-CF zoned parcels. Instead, the existing General Plan allows for flexibility in terms of use by subjecting development to discretionary design review. (Redondo Muni Code § 10-2.1116.)

A4-7

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

2. Response to Comments

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

The building on the Campus, originally constructed in 1958, must be replaced due to its age and seismic deficiencies. [7] A seismic retrofit is economically unfeasible. [8] Additionally, the existing buildings require substantial annual maintenance and investment in the building infrastructure, and soon, BCHD's maintenance costs are expected to exceed its operational revenues. This operational deficit, if prolonged, will lead to a reduction in BCHD programs and ultimately insolvency. To address this, BCHD aims to modernize the Campus to better connect City residents with health and wellness services, programs, and facilities. Since 2017, BCHD has engaged in public outreach to plan and design the Campus. The proposed modernization includes a residential care facility for the elderly (with memory care and assisted living units), space for an all-inclusive care program for the elderly, community services, and a youth wellness center. More information is available online at https://www.bchdcampus.org/faq.

Without any cogent explanation or rationale, the Project sets a maximum FAR on the Campus at 0.75.[9] If adopted, this limit would hinder BCHD's efforts to modernize its outdated and seismically deficient Campus, compromising its ability to provide essential public services, including preventative health care, to the City and surrounding community. Without modernization in the coming years, BCHD will be unable to operate at the Campus, resulting in a loss of vital public health services for the Beach Cities area.

A4-7
Con't

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would "Result in a substantial adverse physical impact associated with the provisions of new or physically altered 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 any of the public services." Since none of the elements required to assess compliance with this standard are presented in the DEIR with regards to BCHD or public health generally, neither the City nor the affected public is provided the substantial information upon which a threshold determination may be derived.

The DPEIR must be revised, and the scope expanded, to include a detailed analysis, supported by substantial evidence, regarding potentially significant public services impacts relating to health as well as feasible mitigation measures and alternatives designed to address those impacts.

---

[7] A copy of the Campus' Seismic Risk Consulting Report is enclosed as Attachment 1.
[8] A copy of the Bain Brothers feasibility report regarding a seismic retrofit is enclosed as Attachment 2.
[9] In fact, it appears that the proposed 0.75 FAR was advanced for the sole and specific purpose of defeating the proposed modernization of the Campus.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

2. The DPEIR Fails To Effectively Evaluate The Impacts Of The Project On Housing And Population.

The DPEIR fails to effectively evaluate the impacts of the proposed Project on housing and population, particularly concerning BCHD's Campus, which plays a crucial role in providing assisted living options for seniors and disabled individuals in in City.

The City's 6th Cycle 2021-2029 Housing Element acknowledges that elderly residents and individuals with disabilities have unique housing needs. (2021-2029 Housing Element, p. 28.) Disabled individuals constitute 6.5% of our City's population, with 45% of them being aged 65 and older. (*Ibid.*) Independent living difficulties are common among these elderly residents. (2021-2029 Housing Element, Table H-18). However, housing options for persons with disabilities, including community care facilities, are limited. Currently, the City has only six residential care facilities for the elderly, with a total capacity of 282 beds. (2021-2029 Housing Element, p. 30). The BCHD Campus houses one of these critical facilities.

The need for suitable housing options for persons with disabilities, including community care facilities, is crucial. The staff report for the Campus' 2006 Conditional Use Permit, which allowed part of its full-service community center to be converted into an assisted living facility, emphasized the urgent need for such facilities to serve elderly individuals wishing to remain in the South Bay area. Similarly, the staff report for the Campus' 2010 Conditional Use Permit to expand the assisted living facility explicitly noted, "[g]iven the aging demographics of [the City's] population, it is not surprising that this facility is looking to expand and it is likely that more of these facilities will be needed in the near future."[10] Moreover, the General Plan Update expressly provides that "it will be important to provide a variety of future residential development for the senior population." (General Plan Update, p. 2-5.)

A4-8

However, the proposed FAR of 0.75 for the Campus not only limits BCHD's ability to provide ongoing residential care for the City's elderly community but also threatens its overall operations. Without the necessary modernization, BCHD will be unable to continue its services, resulting in a significant loss of essential housing and care facilities for our elderly and disabled population. This restriction contradicts the City's commitment to addressing the specialized housing needs of its residents. (See e.g., DPEIR, p. 5.12-11 ["Proposed policies under the Redondo Beach General Plan's Housing and Land Use Elements would ensure the City supports a variety of housing types and densities and provides job growth to accommodate Redondo Beach's residents"].)

The implementation of a 0.75 FAR on the Campus will displace a substantial number of elderly and disabled individuals or reduce the availability of housing options for these vulnerable populations, necessitating the construction of replacement housing elsewhere. This displacement creates significant disruption and hardship for these vulnerable populations, further exacerbating the housing crisis for those with specialized needs.

[10] These CUPs and staff reports are included as Attachments 3 and 4.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

2. Response to Comments

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

Given these documented effects on our vulnerable senior and disabled population, the DPEIR must be revised, and the scope expanded, to include a detailed analysis, supported by substantial evidence, regarding these potentially significant impacts on housing and population. Furthermore, it should outline feasible mitigation measures and alternatives to address those impacts.

A4-8 Cont'

3. The DPEIR Fails to Analyze the Project's Environmental Justice Impacts.

Social and economic factors play an important and explicit part in the CEQA review process. The Legislature stated the intent of CEQA is in part to "[c]reate and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations." (Pub. Resources Code § 21001(e) [emphasis added].) Significantly, the economic and social effects of a project's physical changes to the environment may be considered in determining that the physical change is a significant effect on the environment. (CEQA Guidelines § 15064(e) ["If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect"]; CEQA Guidelines 15131(b) ["economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment"].) Moreover, SB 1000, enacted in 2016, requires local governments in California to incorporate environmental justice into their general plans. This means they must identify and address the needs of disadvantaged communities that face disproportionate environmental and health risks.

A4-9

The CEQA Guidelines illustrate how a physical change to the environment can be a significant impact based on the social or economic impact of that physical change: "For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant." (CEQA Guidelines § 15131(b); see also CEQA Guidelines § 15382 ["A social or economic change related to a physical change may be considered in determining whether the physical change is significant"].)

Accordingly, an agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." (Pub. Res. Code § 21083(b)(3).) An indirect effect that requires CEQA analysis can be an economic one: if a proposed development project may cause economic harm to a community's existing businesses, and if that could in turn "result in business closures and physical deterioration" of that community, then the agency "should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project." (See *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal.App.3d 433, 446.)

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

Here, the DPEIR fails to meet these CEQA requirements for at least two significant reasons. First, the Project's proposed maximum Floor Area Ratio (FAR) of 0.75 effectively prevents the BCHD from modernizing its Campus, which currently provides essential health and housing services to disabled individuals. According to the Housing Element, 6.5% of the City's population is disabled, with 45% of these individuals being aged 65 and older (2021-2029 Housing Element, p. 28). The modernization of the BCHD Campus is crucial for continuing to offer these critical services to our disabled and aging residents.

Without the ability to modernize its facilities, BCHD will be unable to function effectively, resulting in the potential elimination of health services vital to the well-being of these vulnerable populations. The DPEIR does not address this significant impact, which disproportionately affects disabled and aging residents, thereby raising serious environmental justice concerns. Pub. Resources Code § 21083(b)(3) states that a project's environmental effects must be considered significant if they cause a substantial adverse effect on human beings. The failure to account for the Project's impact on the availability of health services for disabled and aging residents falls squarely within this criterion.

Second, the Project impacts employment in the healthcare sector due to the inability to modernize the Campus.[11] Health care is one of the largest occupational categories in the City of Redondo Beach, as outlined in the General Plan Update (DPEIR, p. 5.12-5). The Project's proposed maximum FAR of 0.75 precludes the BCHD from modernizing its Campus, which in turn hinders its ability to provide jobs in this crucial sector. Without modernization, the BCHD's ability to function and offer employment opportunities will be severely compromised, leading to a significant loss of jobs in the community.

A4-9
Cont'

The loss of these jobs would not only affect those employed in the healthcare sector but also have broader economic implications for the City, including reduced access to essential health services for residents. The DPEIR does not adequately address the potential social and economic impacts resulting from the loss of these jobs, particularly as they relate to environmental justice concerns. CEQA Guidelines Section 15131(a) requires the consideration of the economic and social effects of a project when they are related to the physical changes in the environment. The Project's impact on employment in the healthcare sector and the subsequent loss of services constitute a significant indirect physical effect that has not been sufficiently analyzed.

The proposed Project would deprive South Bay residents of critical health and housing opportunities, leading to irreparable social and economic impacts on public land uses in the City. Specifically, the Project would result in the loss of access to health and assisted living facilities, aging residents and health services, and critical employment opportunities. These impacts disproportionately affect vulnerable populations, particularly disabled and aging residents, and as such, should be carefully analyzed under the environmental justice provisions of CEQA.

[11] Additionally, the proposed FAR on the Campus is inconsistent with the General Plan Update's goal to "Maintain existing employers" (General Plan Update, p. 2-27). By hindering BCHD's ability to modernize, the Project contradicts this goal and threatens the stability of one of the City's employers.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

The DPEIR must be revised to include a thorough analysis of the Project's environmental justice impacts, particularly as they relate to the potential loss of health services and employment opportunities for disadvantaged communities. Without this analysis, the EIR fails to comply with CEQA's mandate to protect the environment and public health, especially for those who are most vulnerable.

A4-9 Cont'

C. The DPEIR Fails to Recognize and Analyze Inconsistencies Between General Plan Update Land Use Policies and Proposed Maximum Density/Intensity for Land Use Designations.

CEQA mandates that an EIR must include a discussion of any inconsistencies between the proposed project and applicable general plans or regional plans, including all elements of the General Plan. (14 Cal Code Regs §15125(d)). This requirement is crucial because it ensures that the public and decision-makers are fully informed about the extent to which the proposed project aligns with or deviates from the long-term vision and policies set forth in the General Plan. Such an analysis is essential for evaluating whether the Project is consistent with the community's goals and whether the environmental review is based on a stable and accurate project description.

However, the DPEIR does not provide a thorough analysis of these inconsistencies. Instead, it largely overlooks how the Project may conflict with various elements of the proposed General Plan, including Land Use and Housing Elements. This omission undermines the DPEIR's compliance with CEQA and deprives the public and decision-makers of critical information needed to assess the Project's potential environmental impacts comprehensively.

For instance, the proposed maximum FAR is not consistently applied to all properties with a public or institutional (P) land use designation in the General Plan and zoned P-CF. For example, properties within the City's civic center and the City-owned property at the northeast corner of Pacific Coast Highway and Vincent Street have a proposed maximum FAR of 1.25. However, other properties with a public or institutional (P) land use designation, including the Campus and school sites within the City, have a maximum FAR of 0.75. It's important to note, however, that school sites have a different use and zone designation – school facilities (P-SF) – and may be exempt from local land use regulations under the Government Code. This means that BCHD's Campus is the *only* property of its size with a public or institutional (P) land use designation in the General Plan and zoned P-CF affected by this proposed limitation.

A4-10

Further, the proposed maximum FAR of 0.75 in the draft General Plan update for the Campus is inconsistent with the land use policies and goals of the General Plan, especially regarding public and institutional uses, health and land use, and health partnerships. The Campus aims to provide a well-being hub that serves and connects Beach Cities residents of all ages with abundant health and wellness services, programs, and facilities. The proposed FAR of 0.75 would constrain the Campus' redevelopment and prevent BCHD from achieving its mission. Specifically, the FAR is inconsistent with the following policies identified in the draft General Plan Update:

- **Policy LU-1.13: Public and Institutional Uses**. This policy states that the City should "Provide for the continuation of existing and expansion of governmental

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

administrative and capital facilities, schools, libraries, hospitals and associated medical offices, public cultural facilities, and other public uses, ancillary parks, recreation and open spaces and other public land uses and facilities to support the existing and future population and development of the City." (Draft General Plan Update, p. 2-18; DPEIR, p. 5.10-7) The Campus is a public and institutional use that provides essential health and wellness services to the community. Without modernization, the Campus will be unable to meet the growing and changing needs of Beach Cities residents, leading to a loss of these critical services. The proposed FAR of 0.75 would undermine this policy by limiting the floor area available for these vital purposes, ultimately compromising the health and well-being of the community.

- **Policy LU-4.2: Health and Land Use**. This policy states that the City should "Seek to incorporate health considerations into land use planning decisions in a manner that improves health and well-being." (Draft General Plan Update, p. 2-20; DPEIR, p. 5.10-9) The Campus exemplifies this policy by creating a hub that promotes health and well-being for all generations. However, the proposed FAR of 0.75 would prevent the modernization of the Campus. Without the necessary modernization of the Campus, BCHD will be unable to operate, leading to a deterioration in community health and wellness.

- **Policy LU-4.7: Health Partnerships**. This policy states that the City should "Build and maintain partnerships with health care providers, health-promoting non-profits, and community-based organizations to evaluate and implement land use projects in a manner that improves community health." (Draft General Plan Update, p. 2-21).[12] The Campus reflects this policy by partnering with BCHD, a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City. The proposed FAR of 0.75 would eliminate the Campus' ability to efficiently connect City residents with health and wellness services, programs, and facilities. By imposing this restrictive FAR, the City is essentially dismantling and disregarding its partnership with BCHD, jeopardizing the goal of promoting health in the City and leading to a significant loss of essential health facilities and services for Beach City residents.

A4-10
Con't

Finally, the proposed FAR of 0.75 for the Campus limits its ability to provide ongoing residential care for the City's elderly and disabled community, which directly conflicts with the City's commitment to addressing their specialized housing needs as outlined in the Housing Element. (See e.g., 2021-2029 Housing Element, pp. 28-30, Table H-18). By imposing such a restrictive FAR, the Project undermines the City's ability to meet the growing demand for

[12] The DPEIR notably omits this policy from its environmental analysis (DPEIR, p. 5.10-9). The DPEIR must be revised to include this policy to evaluate its consistency with the General Plan Update's proposed land use designation limitations, particularly the maximum FAR of 0.75 on the Campus.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

2. Response to Comments

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

residential care facilities for elderly and disabled residents. This restriction is not only inconsistent with the goals and policies of the Housing Element but also jeopardizes the ability of seniors to access necessary care within their community.

The failure to address these inconsistencies not only violates CEQA Guidelines but also calls into question the validity of the DPEIR as a tool for informed decision-making. To remedy this deficiency, the City must revise the DPEIR to include a detailed analysis of all inconsistencies between the Project and the elements of the proposed General Plan, considering the Project's alignment with the community's long-term planning goals and evaluating the potential environmental consequences of any conflicts. Specifically, the DPEIR must address the inconsistencies between the General Plan Update's land use policies and the proposed maximum density/intensity for land use designations. Additionally, the DPEIR should include a detailed analysis, supported by substantial evidence, of the significant impact that the proposed FAR on public and institutional uses will have on the availability of essential health services and housing and care facilities for our elderly and disabled residents. It should also outline feasible mitigation measures and alternatives designed to address those impacts.

A4-10 Cont'

D. The Draft SEIR Fails To Adequately Analyze Feasible Alternatives.

CEQA requires that an EIR include a reasonable range of alternatives to the project that would feasibly meet most of the basic project objectives while avoiding or significantly reducing the project's significant impacts. (CEQA Guidelines § 15126.6.) The EIR's alternatives analysis does not comply with CEQA because it includes a legally infeasible alternative as well as an alternative that would not meet most of the basic project objectives and/or avoid or substantially lessen significant environmental impacts. Specifically, it does not analyze any alternative that would mitigate the environmental impacts identified in this letter.

A4-11

E. BCHD was not provided an adequate opportunity to be involved in the preparation of the General Plan update, as required by Gov. Code §§ 65351, 65352, before being submitted to environmental review.

According to Government Code § 65351, the City is required to involve public agencies in the preparation of any amendment to the General Plan. Furthermore, Government Code § 65352 mandates that the City refer any proposed action to amend the General Plan to specified governmental entities, including any special district, such as BCHD, that may be significantly affected by the proposed amendment. Each of these governmental agencies must be given a minimum of 45 days to review and comment on the proposed amendment.[13] Toward that end,

A4-12

[13] As set forth above, at the August 15 Planning Commission meeting, Commissioner Sheila Lamb disclosed her intent to propose additional revisions to the City's land use language relating to the Campus. She did not specify the proposed changes at that time, indicating that she preferred to introduce these changes at the next Planning Commission meeting—after the public review period for the EIR has closed. This approach would allow the changes to be included without environmental review and public scrutiny, including comments from the BCHD, which is a clear violation of not only these provisions, but also CEQA.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

agencies are encouraged to "[c]onsult[] with state and local responsible agencies before and during preparation of an environmental impact report so that the document will meet the needs of all the agencies which will use it." (CEQA Guidelines, § 15006, subd. (g); *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 936.)

BCHD did not receive any notice of the General Plan Update, including the proposed maximum FAR until being served with the Notice of Preparation of Draft EIR. By failing to involve BCHD in the process, the City allowed land use practices that will jeopardize BCHD's ability to continue its mission of providing necessary public services, including preventative health care to the City and surrounding community, to be included in the proposed General Plan update that is being reviewed.

A4-12 Cont'

F. The DPEIR is So Fatally Flawed That Recirculation is Required.

CEQA requires that an EIR be recirculated when "significant new information is added to the EIR" before certification of the document. (See CEQA Guidelines § 15088.5.) "Significant new information" includes a disclosure that a "new significant environmental impact would result from the project" or the "draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded" (*Ibid.*)

For all of the reasons discussed above, the DPEIR's inaccuracies and omissions constitute a serious and significant failing of the process and run counter to CEQA's mandates that an "EIR is to inform other governmental agencies and the public generally of the environmental impact of a proposed project." (CEQA Guidelines, § 15003(d).) BCHD therefore objects to any further action on the Project until the necessary and proper environmental review has been completed and the public has been provided a meaningful opportunity to comment on the new EIR.

A4-13

III. CONCLUSION

While it is plain that an EIR is needed in connection with this proposed Project, it is also clear that the DPEIR should be more complete than the version that was provided for public review and comment. The current version of the DPEIR fails to adequately describe the "Project" thereby thwarting effective public review and comment on the General Plan Update. In several key areas, it fails to thoroughly and adequately identify the Project's significant environmental impacts and propose feasible mitigation measures and alternatives to avoid or substantially lessen such impacts. As such, the DPEIR fails to comply with CEQA, and the DPEIR must therefore be revised, corrected, and re-circulated with all of the analysis and other content required by CEQA before the City may lawfully act on the Project.

Thank you for your consideration of BCHD's comments on the DPEIR. Please do not hesitate to contact the undersigned with any questions concerning this correspondence.

A4-14

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

2. Response to Comments

BCHD Beach Cities Health District
A Public Agency

Live Well. Health Matters.

Very truly yours,

BEACH CITIES HEALTH DISTRICT

Tom Bakaly
Chief Executive Officer

cc: Monica Suua, CFO, Beach Cities Health District (monica.suua@bchd.org)
Joseph Larsen, Rutan & Tucker LLP (jlarsen@rutan.com)
Michael W. Webb, City Attorney, City of Redondo Beach
(michael.webb@redondo.org)

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

A4. Response to Comments from the Beach Cities Health District, dated September 11, 2024.

A4-1 This comment introduces the Beach Cities Health District (BCHD) as a public agency that provides preventive health services to residents of the South Bay, including the City of Redondo Beach. The commenter raises concerns regarding the public review period and states that the amount of time to review the DPEIR was not sufficient considering the DPEIR is over 700 pages long, as are the appendices. The commenter requests an extension of the review and comment period to thoroughly review a document of this volume. Under CEQA Guidelines Section 15105, a minimum 45 day public review period for a draft Environmental Impact Report is required is it is submitted to the State Clearinghouse for review by state agencies, extensions of the review period occur under . unusual circumstances. Unusual circumstances are at the discretion of the lead agency and are not warranted at this time. The public review period for the DPEIR was 47 days, meeting the requirements under CEQA. Additionally, the commenter raises concerns regarding the DPEIR and how it fails to meet the requirements of CEQA and requests the recirculation of the DPEIR. As further discussed in the responses provided below, no further analysis is required and recirculation of the DPEIR is not warranted. Please refer to the comments below that address these comments in greater detail.

A4-2 This comment further introduces the concerns raised in this letter. The comment outlines the necessary contents of a Draft EIR pursuant to CEQA Guidelines, which include (1) the Project Description, (2) the Environmental Setting, (3) Significant Environmental Impacts, (4) Mitigation Measures, (5) Alternatives, and (6) Cumulative Impacts. As discussed in DPEIR section 1.2.2, *Type and Purpose of this Draft PEIR*, a Program EIR was prepared for the proposed project in accordance with CEQA Guidelines, Section 15168, and includes all of these components. No environmental issues were raised in this comment regarding the adequacy of the DPEIR and no further analysis is warranted.

A4-3 This comment states the DPEIR fails to contain an adequate project description, properly identify the environmental setting, adequately assess the proposed project's potentially significant environmental effects, and identify feasible mitigation measures and alternatives to avoid or lessen significant environmental impacts. Issues raised in this comment are addressed in detail in comments A4-4 through A4-13. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-4 This comment states the DPEIR does not provide a full and accurate description of the proposed project. The commenter also expresses concerns regarding the opportunity to provide comments on modifications of the proposed project after the public review period. As discussed in DPEIR Section 3, *Project Description*, California state law requires each city and county to adopt a comprehensive, long-term general plan. Consistent with this requirement, the City is updating five of the State-required elements that make up the City of Redondo Beach General Plan. Updates to these elements are accompanied by associated revisions to the City's Zoning Ordinances and Local Coastal Program (LCP). The project description of the DPEIR contains accurate and detailed information

explicitly describing all the components of the proposed project, including summaries of the general plan element updates, the zoning updates, the updates to the City's LCP, and the City's objectives. Multiple Tables and Figures are included in the project description to further illustrate and clarify the scope of the project.

Additionally, revisions proposed by the Planning Commission are recommendations only and not formal changes to the project being proposed and analyzed. Proposed changes discussed by the Planning Commission are within the scope of the EIR. Additionally, revisions often occur in response to the comments and concerns received during the public review period. However, changes that do not significantly change the analysis of the DPEIR would not result in recirculation. Therefore, no revisions are necessary. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-5 This comment raises concerns regarding inconsistencies in floor area ratio (FAR) application and inadequate General Plan buildout. As discussed on Page 3-25 of the DPEIR, the Public Institutional (PI) land use designation was analyzed for reasonable growth by 2050 at a FAR consistent with the proposed land use designation, existing conditions, and known projects with application and/or certified EIR at the time of release of the Notice of Preparation. Specifically, growth for BCHD was projected consistently with the site development plan/program for phases 1 and 2, as described in the project description of the 2021 certified final environmental impact report in the Table titled "Proposed Project at a Glance" on page 2-1 of that documents Project Description section (SCH No. 2019060258) in the buildout methodology for the General Plan Update (see Appendix B, *Buildout Methodology*, of the DPEIR). When considering buildout conditions, the need for new public and institutional development building space is often minimal in a built out city, even when new residential and nonresidential growth is forecast throughout the balance of the city. Often, the incremental increased need for public services is accommodated within existing building and property footprints. While some facilities may get redesigned and rebuilt (due to aging of infrastructure or buildings), the average intensity of building space for public and institutional development is primarily driven by the intensity of existing facilities, almost all of which are currently far below (less than half) of the maximum allowable FAR. The BCHD is an existing non-conforming use that currently exceeds (by 0.02) the maximum FAR of 0.75; however, the buildout assumes 0.85 FAR to align with the proposed development plan/program in the property's proposed Healthy Living Campus Master Plan FEIR. The General Plan and Zoning Ordinance currently do not place a cap on the FAR for most of the PI zones, with the exception of City Hall and the Annex located on the northeast corner of PCH and Vincent Street, which have a FAR of 1.25. Under the proposed project, the maximum FAR for the PI land use designation would remain at 1.25 for the City Hall and the Annex and be designated at0.75 for all other PI designated properties. Moreover, in contrast with commercial and industrial uses, the shape and size of public and institutional uses are subject to different market forces and are less predictably driven by the maximum

development intensity allowed. Changes to the land use designation, including the PI land use, are consistent with the General Plan buildout; therefore, the DPEIR contains sufficient analysis at a program level and no changes are necessary.

A4-6 This comment states that the DPEIR fails to acknowledge and analyze various significant environmental impacts due to improper buildout methodology. As discussed in comment A4-5, changes to land use designation in the DPEIR are consistent with General Plan Update buildout since there are several areas within the PI land use category where change is not anticipated and because the City is built out, the proposed plan anticipates that any increase in services within this land use category would be accommodated on existing sites and within existing building footprints. Additionally, a maximum FAR was added to comply with State Law requiring cities to establish standards of population density and building intensity. Additionally, the proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. At the general plan level, it is speculative and infeasible to evaluate project-specific environmental impacts associated with specific construction of development since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demand from buildout, the appropriate level of analysis required under CEQA would be conducted.

A4-7 This comment states that the DPEIR fails to evaluate impacts to public health services. Impacts to public services, including fire, police, school and library facilities, are addressed in Section 5.13 of the DPEIR. The CEQA Guidelines do not require analysis of a project's potential impacts upon public health services; CEQA is focused on potential impacts to the physical environment. The proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. At the general plan level, it is speculative and infeasible to evaluate project-specific environmental impacts associated with specific construction of projects since specific sites and time frames for development are unknown. There are no pending applications, including from BCHD, related to these PI sites. This DPEIR fulfills the requirements for a Program EIR. Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document is necessary. Use of a Program EIR gives the lead agency an opportunity to consider broad policy alternatives and program wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale. When specific projects are necessary to meet the growth demand from buildout, the appropriate level of analysis required under CEQA would be conducted.

A4-8 This comment states that the DPEIR fails to effectively evaluate impacts on housing and population, specifically related to assisted living options. The comment raises concerns regarding land use changes associated with PI designations and states that the proposed FAR will result in a significant loss of essential housing for the elderly and disabled. Concerns raised regarding proposed FAR are addressed in comment A4-5, above.

Buildout of the proposed project is not linked to a development timeline and is based on a reasonable buildout of the parcels in the city, nor would proposed land use changes change existing uses on site. No limitations on overall operation of the campus would be placed as a result of the proposed project. As noted in this DPEIR, Appendix B, *Buildout Methodology*, assisted living units, have aspects of both residential and non-residential uses, but they must be analyzed as either a residential use or a non-residential use in the technical studies of the PEIR to avoid double-counting associated impacts. The DPEIR conservatively analyzed all assisted living facilities in the City as residential uses. Where FARs for facilities with assisted living are identified, however, the FAR includes the building square footage associated with the assisted living facility. Additionally, the proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. Lastly, the City of Redondo Beach General Plan contains a Senior Citizen/Childcare Services Element that is designed to address the needs and preferences of the senior population; no changes to this element are proposed for updates as part of this effort.

A4-9 This comment states that the DPEIR fails to analyze environmental justice impacts. Environmental justice is not a topic under CEQA. Furthermore, there are no environmental justice communities in the City of Redondo Beach. However environmental justice may be indirectly addressed under the topic of housing and population, which involves ensuring that the environmental impacts of a proposed project do not displace communities. As discussed in DPEIR Section 5.12, *Population and Housing*, the proposed project would increase opportunities for housing, provide a variety of housing types, and exceed the RHNA goal for new housing units. Therefore, the proposed project would not displace housing. Additionally, there are no environmental justice communities in the city. The proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. The proposed project was analyzed at the program-level and would not eliminate any existing improvements or housing. The proposed project would also result in an increase in employment by 16% above existing conditions (see page 5.10-6 of the DPEIR). The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-10 This comment states that the DPEIR fails to recognize and analyze inconsistencies between General Plan Update Land Use Policies and proposed maximum density for land use designations, including FAR. Concerns raised regarding proposed FAR are addressed in comment A4-5. As discussed in comment A4-5, changes to land use designation in the DPEIR are consistent with the General Plan Update buildout since there are several areas within the PI land use category where change is not anticipated and because the City is built out, the proposed plan anticipates that any increase in services within this land use category would be accommodated on existing sites and within existing building footprints. Additionally, a maximum FAR was added to comply with State Law requiring cities to establish standards of population density and building intensity. Existing uses in the PI

land use category where the FAR in the proposed plan has been set to 0.75 include: 12 public schools, 1 private school, 2 fire stations, a water storage facility and adjacent open space area, the City Yard, the parking lot in Riviera Village, the North Redondo Beach Library, the Kensington Assisted Living Community (developed on school property), and Beach Cities Health District. As discussed in Section 5.10, *Land Use and Planning*, a primary goal of the proposed project is to retain the City's current character, and several policies of the proposed project address consistency of new development with existing development. Additionally, as discussed previously, the proposed project exceeds the RHNA goal for new housing units and would increase opportunities for housing. However, this comment does not raise any environmental concerns regarding the adequacy of the DPEIR analysis, therefore no revisions to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-11 This comment states that the DPEIR fails to analyze feasible alternatives. DPEIR Chapter 6, *Alternatives to the Project*, includes a reasonable range of feasible alternatives to the project that meet the defined basic objective of the project but avoid or substantially lessen identified significant environmental impacts, as defined in CEQA Guidelines Section 15123.6(a). Additional alternatives to the project were considered but rejected, as detailed in Chapter 6 of the DPEIR. Additionally, the DPEIR does not need to address all possible alternatives and there are no additional impacts that the DPEIR has not disclosed. Therefore there is no need for additional alternatives to address concerns raised in this letter.

A4-12 This comment states that the BCHD was not given adequate opportunity to be involved in the preparation of the General Plan Update. The BCHD met with members of the General Plan Advisory Committee (GPAC) as well as presented on the topic of "Blue Zones" in September of 2018. This meeting agenda included as the priority task to discuss and reach consensus on Draft Land Use definitions. BCHD was also notified of preparation of the DPEIR during the EIR scoping process. BCHD was sent a Notice of Preparation (NOP) via certified mail on June 1, 2023. A representative on behalf of BCHD, from the law firm Rutan & Tucker LLP, attended the EIR scoping meeting on June 8, 2023. At the scoping meeting, BCHD stated its concern related to the proposed 0.75 FAR for the PI land use designation. Following the scoping meeting, BCHD submitted a comment letter (dated June 26, 2023) reiterating its concerns associated with the proposed 0.75 FAR for PI land use designation (see Appendix A*, Notice of Preparation and Public Comment Letters*, of the DPEIR). BCHD was sent via certified mail a Notice of Availability (NOA) of the release of the DPEIR on August 1, 2024, notifying BCHD of the 47-day review period. As discussed above under Response to Comment A4-5, and on Page 3-25 of the DPEIR, the Public Institutional (PI) land use designation analyzed reasonable growth by 2050 at a FAR consistent with the proposed land use designation, existing conditions, and known projects with application and/or certified EIR at the time of release of the Notice of Preparation. Specifically, growth for BCHD was projected

consistently with the site development plan/program for phases 1 and 2, as described in the project description of the 2021 certified final environmental impact report in the Table titled "Proposed Project at a Glance" on page 2-1 of that documents Project Description section (SCH No. 2019060258), in the buildout methodology for the General Plan Update (see Appendix B, *Buildout Methodology*, of the DPEIR). As BCHD was involved with the City's General Plan Advisory Committee as early as 2018 and as proper noticing for the DPEIR was completed pursuant to the CEQA Guidelines and the buildout methodology associated with the PI land use accounted for known projects at the time of the preparation of the NOP, no revisions to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-13 This comment requests recirculation of the DPEIR as a result of the issues raised in this letter. Recirculation of a DPEIR under CEQA is required for significant changes to the project after the Draft EIR is released that may result in new or increased significant environmental impacts; for new information that was not available during the initial review period and could affect conclusions in the Draft EIR; for revisions that affect impact analysis; or if numerous public comments reveal significant issues not previously addressed that would lead to new environmental impacts. The DPEIR accurately analyzes impacts on a program-level. Section 1.2.2, *Type and Purpose of this Draft PEIR*, page 1-3, lays out the requirements of the CEQA Guidelines and why a program-level EIR is the appropriate level of CEQA review to support the proposed project. The proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. Therefore, this section of the DPEIR accurately describes the processes that the City must take to ensure CEQA compliance for any future projects that may be facilitated by the proposed project. No further analysis is required and recirculation of the DPEIR is not warranted.

A4-14 This comment concludes and summarizes the letter written by the BCHD. Please see the responses provided above that address each of the issues outlined in this comment. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4 Attachment 1

The letter includes a Seismic Risk Consulting Report. This attachment does not warrant changes under CEQA. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. (See Appendix A of this FPEIR.)

A4 Attachment 2

This letter includes a report: Evaluation of Development Strategy: Seismic Retrofitting. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. (See Appendix A of this FPEIR.)

A4 Attachments 3 and 4

This letter includes resolutions and administrative reports for the Planning Commission Hearings. These attachments do not warrant changes under CEQA. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. (See Appendix A of this FPEIR.)

2. Response to Comments

LETTER A5 – Los Angeles County Metropolitan Transportation Authority

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

Comment Letter A5

September 16, 2024

City of Redondo Beach
Marc Wiener, Community Development Director
Sean Scully, Planning Manger
Community Development Department, Door 2
415 Diamond Street
Redondo Beach, California 90277

Sent by Email: GeneralPlanEIR@redondo.org

RE: Redondo Beach Focused General Plan Update
Amended Notice of Availability of Environmental Impact Report (EIR)

Dear Director Wiener and Mr. Scully:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment (Plan Update) located in the City of Redondo Beach (City). Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities. A5-1

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

Plan Update Description

The Plan Update effort focuses on updating four (4) elements (Land Use, Open Space and Conservation, Safety, and Noise) that were last updated in 1992. These four elements will combine with elements that are not being updated to compose the City's comprehensive General Plan. A5-2

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Page 1 of 4

Redondo Beach Focused GPU Notice of Availability
Notice of Availability – Metro Comments
September 16, 2024

The focused update also includes a new Introduction, which includes a vision statement (Vision 2050), Guiding Principles developed as part of the process by the City's General Plan Advisory Committee (GPAC), growth projections by 2050, and implementation actions.

A5-2 Cont'

Comments

Transit Services and Facilities

The Plan Update and associated EIR should include updated information on existing and planned transit services and facilities within the Plan Update area. In particular, Metro's NextGen Bus Plan (completed in December 2021) should be used as a resource to determine the location of high-frequency bus services and stops within the Plan Update area. For more information, visit the NextGen Bus Plan's website at https://www.metro.net/projects/nextgen/. The most recent transit schedule and stop information is available at https://www.metro.net/riding/schedules-2/.
In addition, the Plan Update and EIR should include stations for all rail lines that are existing and under construction. Please refer to Metro's 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

A5-3

Adjacency to Planned Light Rail Facilities

The Plan Update area includes the Metro-owned Right-of-Way (ROW) and planned light rail facilities for C Line Extension to Torrance. The project would extend transit service from the Redondo Beach (Marine) Station where it currently ends to the new Mary K. Giordano Regional Transit Center (Torrance Transit Center). Metro released a Draft EIR in January 2023. In May 2024, the Metro Board of Directors selected the Hybrid Alternative as the Locally Preferred Alternative (LPA), including a future station that would be located adjacent to the existing Redondo Beach Transit Center located on Kingsdale Avenue, and directed staff to continue the EIR process in compliance with CEQA; complete studies to respond fully to public comments received on the ROW and Hawthorne Blvd Alignments in the Final EIR; and continue to develop refined cost estimates for the LPA on the ROW alignment and develop a refined funding plan that includes the identification of all federal, State, and local funding sources to implement the project.

A5-4

To avoid any confusion, the Plan Update and EIR should note that the correct name of the existing line is the C Line (Green). This is the official designation of the light rail used by Metro.

Metro recommends that the Plan Update consider appropriate and compatible uses along the rail corridor and development standards for new development projects adjacent to the planned light rail corridor to ensure safety and maintenance. See the Metro Adjacent Development Handbook for best practices (available at https://www.metro.net/devreview). Please contact Georgia Sheridan, Senior Director, for more information on the C Line Project, at sheridang@metro.net. The project website is at metro.net/clineext.

Page 2 of 4

2. Response to Comments

Redondo Beach Focused GPU Notice of Availability
Notice of Availability – Metro Comments
September 16, 2024

Transit Orientation Considerations

Considering the Plan Update area's inclusion of the planned light rail, as well as several key bus lines, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro Rail stations, including orienting pedestrian pathways towards the station.

2. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Plan's development standards, including:

    a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access Metro Rail stations and Metro Bus stops.

    b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The City should also coordinate with the Metro Bike Share program to explore potential Bike Share stations in the Plan Update area.

    c. First & Last Mile Access: The City should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.

3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

A5-5

A5-6

A5-7

Page 3 of 4

Redondo Beach Focused GPU Notice of Availability
Notice of Availability – Metro Comments
September 16, 2024

4. Wayfinding: Wayfinding signage should be considered as part of the Plan Update to help people navigate through the Plan Update area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

A5-8

Metro looks forward to continuing to collaborate with the City to effectuate policies and implementation activities that promote transit-oriented communities. If you have any questions regarding this letter, please contact me by phone at 213.418.3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012-2952

Sincerely,

Digitally signed by Shine Ling
DN: C=US, E=lingsx@metro.net, O=Los Angeles County Metropolitan Transportation Authority (Metro), OU=Transit Oriented Communities, CN=Shine Ling
Date: 2024.09.16 11:58:35-07'00'

Shine Ling, AICP
Senior Director, Development Review Team
Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: https://www.metro.net/projects/devreview/

Page 4 of 4

A5. Response to Comments from the Los Angeles County Metropolitan Transportation Authority, dated September 16, 2024.

A5-1 The Los Angeles County Metropolitan Transportation Authority (Metro) has submitted a comment letter that provides transit systems and infrastructure information for consideration in the DPEIR. This comment does not raise concerns regarding the adequacy of the DPEIR, and the specific comments in this letter are further addressed below. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-2 This comment summarizes the proposed project's efforts to update the General Plan, including a vision statement, guiding principles, implementation actions, and growth projections by 2050. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-3 This comment suggests that Metro's NextGen Bus Plan be used as a resource to determine transit services and facilities in the planning area. The comment provides links for further information. As discussed on page 5.15-6 of the DPEIR, Metro's NextGen Bus Plan was incorporated into the description of transit routes in the planning area. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-4 This comment provides background information for the planned light rail facilities and notes that the correct name for the existing line is the C Line (Green), which is the official designation of the light rail used by Metro, and that it should be referred to as such in the DPEIR. The comment also provides a link for the Metro Adjacent Development Handbook for best practices. Page 5.15-20 of the DPEIR discusses the Metro C Line (Green) accurately, consistent with the comments in Metro's letter. No changes to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-5 This comment shares Metro's support for development of commercial and residential properties near transit stations and encourages the City to be mindful of proposed development in proximity to Metro Rail stations, including orientation of pedestrian pathways. Goals and policies implemented by the proposed project would facilitate streetscape improvements, encourage pedestrian access for new development, support location of transit stations, and facilitate bicycling and pedestrian linkages (Policies LU 2.7, 2.8, 3.6, 3.8, and 4.6). This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-6 This comment encourages the installation of safe and convenient connections for pedestrians, people riding bicycles, and transit uses. Goals and policies implemented by the proposed project would facilitate streetscape improvements, encourage pedestrian access for new development, support location of transit stations, and facilitate bicycling

and pedestrian linkages (Policies LU 2.7, 2.8, 3.6, 3.8, and 4.6). This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-7 This comment encourages the incorporation of transit-oriented, pedestrian-oriented parking strategies. Parking requirements were adjusted as part of the proposed project to implement Housing Element Program 13 (see Table 3-7 on page 3-33 of the DPEIR). This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-8 This comment suggests that wayfinding signage be considered to help people navigate through the planning area to all modes of transportation. Policy P33 of the Transportation and Circulation Element would enhance transit wayfinding and signage at transit stops, which would remain consistent with the proposed Land Use Element policies (see page 5.15-8 of the DPEIR). This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

2. Response to Comments

LETTER O1 - Morongo Band of Mission Indians

TRIBAL HISTORIC PRESERVATION OFFICE

Comment Letter O1

VIA ELECTRONIC MAIL

GeneralPlanEIR@redondo.org

Marc Wiener
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

MORONGO BAND OF MISSION INDIANS
A SOVEREIGN NATION

August 12, 2024

Re: Notice of Availability Draft Environmental Impact Report Focused General Plan Update, City of Redondo Beach, California

The Morongo Band of Mission Indians (Tribe/MBMI) Tribal Historic Preservation Office received your letter regarding the above referenced Project. The proposed Project is not located within the boundaries of the ancestral territory or traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians.

Thank you for notifying the MBMI about this project. MBMI encourages your consultation with tribes more closely associated with the lands upon which the project is located.

O1-1

Respectfully,

Bernadette Ann Brierty

Bernadette Ann Brierty
Tribal Historic Preservation Officer
Morongo Band of Mission Indians

CC: Morongo THPO

12700 Pumarra Road – Banning, CA 92220 – (951) 755-5259 – Fax (951) 572-6004 – THPO@morongo-nsn.gov

O1. Response to Morongo Band of Mission Indians, dated August 18, 2024.

O1-1 The commenter acknowledges receipt of the Notice of Availability (NOA) for the DPEIR. The commenter confirms that the proposed project is not within the boundaries of the area of the Morongo Band of Mission Indians, and as such no consultation is requested. This comment does not raise any environmental issue regarding the adequacy of the DPEIR; therefore, a response is not required pursuant to CEQA. This comment is acknowledged for the record.

2. Response to Comments

LETTER O2 – StopBCHD

Comment Letter O2

Outlook

FYI - BCHD Unimpressive Health Outcomes

From Stop BCHD <stop.bchd@gmail.com>
Date Fri 2024-09-20 1:21 AM
To Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>; Marc Wiener <Marc.Wiener@redondo.org>

*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

O2-1

LA County Health did a fair unbiased Health Survey in 2023 and published it this year. Of the 50 highest income Cities in the County, 19 were large enough to get valid survey results and they are below.

(We used the odd Gallup ranking methodology for the "value" of health outcomes, since BCHD made Taxpayers fund it – likely as an ADVERTISEMENT for their Bond Measure)

Manhattan Beach (#6 City in income in LA County) was Top 25% in high income City health outcomes in the 2023 LA County Health Survey.

Hermosa Beach (#16 in income) was too small population for valid survey data.

Redondo Beach (#22 in income) was in the below average in health outcomes.

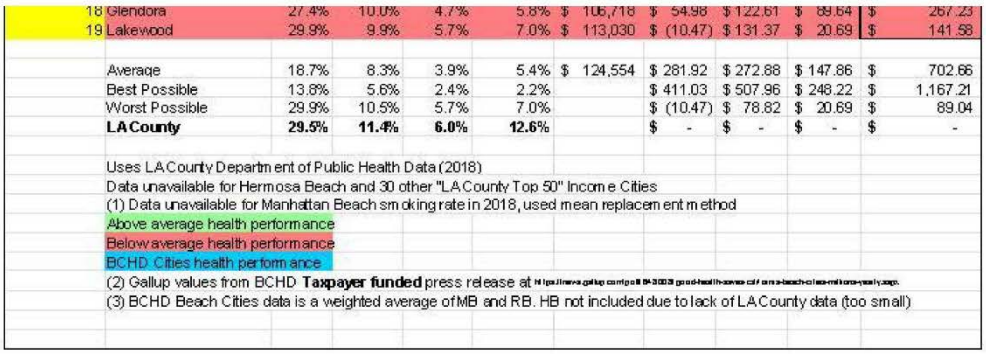
BCHD's Beach Cities (averaged together) were just slightly above "average" in health outcomes.

REMEMBER – NO OTHER TOP 50 INCOME CITIES IN LA COUNTY HAVE A HEALTH DISTRICT – WHY ARE BCHD Beach Cities Health Outcomes ONLY AVERAGE?

Gallup Methodology Health "Savings" Rating		Obesity	Diabetes	Smoking	Uninsured	HH Income	Gallup per capita Obesity Value (2)	Gallup per capita Diabetes Value (2)	Gallup per capita Smoking Value (2)	Per Person "Savings" vs. LA County Average Health Performance
							$ 2,618	$ 8,758	$ 6,895	
1	Calabasas	14.8%	5.6%	2.4%	3.8%	$ 154,079	$ 384.85	$ 507.96	$ 248.22	$ 1,141.03
2	Bev Hills	14.1%	5.6%	2.9%	6.2%	$ 116,771	$ 403.17	$ 507.96	$ 213.75	$ 1,124.88
3	Santa Monica	14.9%	5.6%	3.4%	6.1%	$ 106,797	$ 382.23	$ 507.96	$ 179.27	$ 1,069.46
4	**Manhattan Beach (1)**	13.8%	6.0%	3.9%	2.2%	$ 187,217	$ 411.03	$ 472.93	*$ 144.80*	$ 1,028.75
5	Rancho PV	14.6%	7.6%	3.0%	4.0%	$ 166,747	$ 390.08	$ 332.80	$ 206.85	$ 929.74
6	Culver City	18.3%	6.1%	4.0%	5.3%	$ 114,429	$ 293.22	$ 464.17	$ 137.90	$ 895.29
7	So. Pasadena	15.0%	8.3%	2.6%	5.4%	$ 127,882	$ 379.61	$ 271.50	$ 234.43	$ 885.54
8	Claremont	17.3%	7.9%	3.7%	4.8%	$ 115,091	$ 319.40	$ 306.53	$ 158.59	$ 784.51
	BEACH CITIES (3)	16.7%	7.3%	4.8%	n/a	n/a	$ 336.29	$ 362.46	$ 80.71	$ 779.46
9	Cerritos	16.2%	9.4%	2.6%	4.7%	$ 124,460	$ 348.19	$ 175.16	$ 234.43	$ 757.78
10	Walnut	14.7%	10.5%	3.1%	6.9%	$ 130,444	$ 387.46	$ 78.82	$ 199.96	$ 666.24
11	**Redondo Beach**	18.1%	7.9%	5.3%	4.9%	$ 134,033	$ 298.45	$ 306.53	$ 48.27	$ 653.25
12	Santa Clarita	27.3%	6.2%	4.4%	6.6%	$ 116,186	$ 57.60	$ 455.42	$ 110.32	$ 623.33
13	Arcadia	14.8%	10.2%	4.1%	6.1%	$ 108,214	$ 384.85	$ 105.10	$ 131.01	$ 620.95
14	Diamond Bar	15.4%	10.5%	3.9%	5.4%	$ 106,881	$ 369.14	$ 78.82	$ 144.80	$ 592.76
15	La Mirada	25.0%	9.9%	3.5%	5.5%	$ 104,130	$ 117.81	$ 131.37	$ 172.38	$ 421.56
16	Torrance	21.0%	9.8%	5.7%	7.0%	$ 109,554	$ 222.53	$ 140.13	$ 20.69	$ 383.34
17	Altadena	23.3%	10.4%	4.4%	5.2%	$ 123,869	$ 162.32	$ 87.58	$ 110.32	$ 360.22

O2-1
Con't

2. Response to Comments



18	Glendora	27.4%	10.0%	4.7%	5.8%	$ 106,716	$ 54.98	$ 122.61	$ 89.64	$ 267.23
19	Lakewood	29.9%	9.9%	5.7%	7.0%	$ 113,030	$ (10.47)	$ 131.37	$ 20.69	$ 141.58
	Average	18.7%	8.3%	3.9%	5.4%	$ 124,554	$ 281.92	$ 272.88	$ 147.86	$ 702.66
	Best Possible	13.8%	5.6%	2.4%	2.2%		$ 411.03	$ 507.96	$ 248.22	$ 1,167.21
	Worst Possible	29.9%	10.5%	5.7%	7.0%		$ (10.47)	$ 78.82	$ 20.69	$ 89.04
	LA County	**29.5%**	**11.4%**	**6.0%**	**12.6%**		$ -	$ -	$ -	$ -

Uses LA County Department of Public Health Data (2018)
Data unavailable for Hermosa Beach and 30 other "LA County Top 50" Income Cities
(1) Data unavailable for Manhattan Beach smoking rate in 2018, used mean replacement method
Above average health performance
Below average health performance
BCHD Cities health performance
(2) Gallup values from BCHD **Taxpayer funded** press release at https://news.gallup.com/poll/194303/good-health-scarce-california-beach-cities-millions-yearly.aspx.
(3) BCHD Beach Cities data is a weighted average of MB and RB. HB not included due to lack of LA County data (too small)

O2-1
Cont'

--

StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

O2. Response to Comments from the StopBCHD dated September 20, 2024.

O2-1 This comment was received from the StopBCHD organization, which is a neighborhood quality-of-life community that raises concerns regarding BCHD's commercial development. This comment provides a summary of a survey taken in 2023 on Fair Unbiased Health. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

2. Response to Comments

LETTER O3 – StopBCHD

Comment Letter O3

Outlook

StopBCHD submission on FAR for P-CF Zoning

From Stop BCHD <stop.bchd@gmail.com>
Date Thu 2024-09-19 2:52 PM
To Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; CityClerk <CityClerk@redondo.org>

1 attachments (12 MB)
DEIR - BCHD - Analysis of P-CF Zoning Integration.odt;

CAUTION: Email is from an external source; ***Stop, Look, and Think*** *before opening attachments or links.*

Public Comment: City Council, Planning Commission, GPAC, General Plan record, General Plan EIR

In 2020, StopBCHD provided comments to the City and BCHD on the BCHD Draft EIR for the Wealthy Living Campus. Those comments included the attached document that provides photos and descriptions of all the P-CF parcels as of 2020. It is clear from that material that BCHD is an outlier in FAR as built, and that BCHD's proposed 793,000 sqft full build-out with an FAR of nearly 2.0 would irreparably damage the surrounding neighborhood character and property value. O3-1

The 2020 document is attached.

We stand by our analysis that 0.75 is a maximum FAR and that left unchecked, BCHD will destroy the surrounding neighborhood character and property value.

--
StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

Analysis of the Neighborhood Impacts of P-CF Zoned Parcels in Redondo Beach, CA

Based on information from city Director Brandy Forbes, there are seven (7) P-CF parcels in Redondo Beach. They are:

1) Andrews Park	1801 Rockefeller Ln, Redondo Beach, CA 90278
2) Beach Cities Health District	514 N. Prospect Av, Redondo Beach, CA 90277
3) Broadway Fire Station (#1)	401 S Broadway, Redondo Beach, CA 90277
4) City of Redondo Beach Facility	1513 Beryl St, Redondo Beach, CA 90277
5) Grant Fire Station (#2)	2400 Grant Ave, Redondo Beach, CA 90278
6) Kensington Assisted Living	801 S Pacific Coast Hwy, Redondo Beach, CA 90277
7) North Branch Library	2000 Artesia Bl, Redondo Beach, CA 90278

With the exception of BCHD, the former South Bay Hospital parcel and the City of Redondo Beach multiple use facility, the remaining five (5) P-CF parcel uses appear to be consistent with surrounding land uses from a design, height, and traffic perspective.

Andrews Park

Per the City of Redondo Beach, Andrews Park is local neighborhood recreation facility, "Andrews Parkette is a 1.61 acre park located just north of Grant Avenue in Redondo Beach. The park features grass, trees, play equipment, picnic tables and picnic shelter." Based on observation, there are no features at Andrews Park, such as commercial buildings or tall parking structures that are inconsistent with the surrounding neighborhood uses and design. Andrews Park is a recreation facility per the City of Redondo Beach.

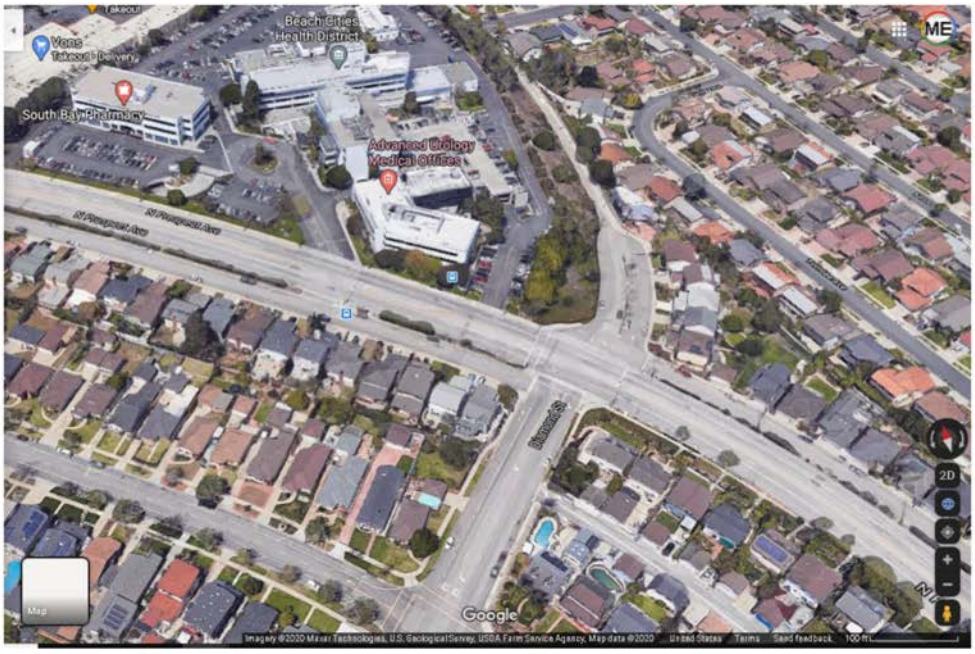


Beach Cities Health District (BCHD)

BCHD was renamed from South Bay Hospital District (SBHD) in 1993 following the 1984 failure of South Bay Hospital as a publicly-owned emergency hospital, and the subsequent failure as a leased facility to AMI/Tenet. Per Google Earth Pro (GEP) measurements, the hospital towers are generally 4-story, 60-feet tall. Per BCHD, there is a single, 900-sqft "penthouse" mechanical room atop the 514 N. Prospect hospital building at 75-feet. That represents 0.3% of the approximately 300,000-sqft of the

2. Response to Comments

existing campus buildings. At 75-feet, BCHD is 250% the height of surrounding 30-foot height zoning limits. SBHD also allowed construction of two (2) medical office buildings on land it leased to third (3rd) parties. These buildings are both 3-stories and 40-feet, also according to GEP measurements. They are both 130% of local zoning height restrictions and the 510 N. Prospect building is built at the west-most lot line, increasing its mass, noise reflection, and visual height to a maximum for its construction. At 130% to 250% in excess of surrounding zoning height limits, with concrete sound-reflective walls, substantial reflective glass, night time outdoor lighting, traffic, and emergency siren activity, BCHD is not consistent with the surrounding neighborhoods in function nor design.



Broadway Fire Station (#1)

Per in-person visual inspection, the Broadway Fire Station is a corner lot with general building height of 1-story, except for a specialized small footprint multistory tower. The overall facility is generally lower height than surrounding residential and multi-family facilities and built in a not dissimilar architectural design to minimize its impacts.



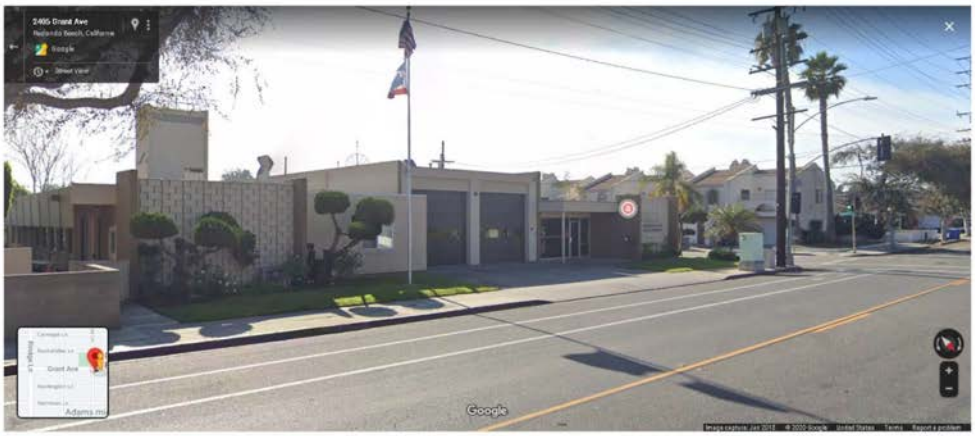
City of Redondo Beach Facility (Beryl St)
Per in-person visual inspection, this multi-use facility houses both the police shooting range and a number of public works functions. It is in the southeastern most corner of the Dominguez Park parcel, adjacent to the Edison right-of-way and across the street from Towers Elementary. The Edison right-of-way to the north is utility/industrial use and the park to the west is public use and significantly elevated above the parcel. The Torrance public facility, Towers Elementary is to the south. There is some residential to the east behind a sound wall. On three (3) sides, the use of this parcel is consistent with its surrounding public facility zoning, although the police shoot range has decades of controversy surrounding it. The residential to the east is buffered by a strip of land and the road. Most of this parcel's surrounding neighbors are consistent uses.



Grant Fire Station (#2)

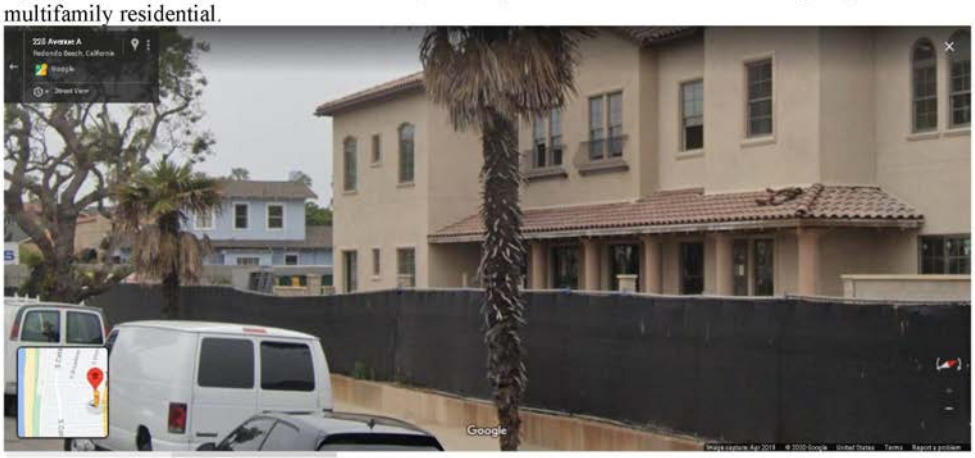
2. Response to Comments

Per in-person visual inspection, the Grant Fire Station is a corner lot with general building height of 1-1/2-stories, except for a specialized small footprint multistory tower. The overall facility is generally lower height than surrounding residential and multi-family facilities except for the specialized tower, and built in a not dissimilar architectural design to minimize its impacts.



Kensington Assisted Living

Per the City of Redondo Beach EIR, the project includes an 80,000-square foot assisted living facility with 96 suites and 11,000-sqft of common space on 3.37 acres gross. The footprint of the facility buildings is 1.15 acres based on aerial analysis. The architecture and design is earth tone Spanish revival and at 33-feet maximum height is very consistent with the surrounding single and multifamily residential.



North Branch Library

Based on aerial analysis and GEP, the North Library is approximately 12,000 sqft footprint and surrounded on three (3) sides by commercial development. To the south is multifamily residential. Based on in-person inspection, the interface of the tallest point of the library and the multi-family to the south are approximately equal height at two (2) stories. The mixed use to the north of the Library is nominally 4-stories and more visually massed than the Library. The Library has clean design and is consistent with the adjoining land uses visually and in terms of height, is lower than the land use to the north.



Conclusion

Based on this analysis, only BCHD is vastly out of scale and design with surrounding neighborhoods. Except for a small, local servicing strip mall to its north, the 30-foot elevated site of BCHD is visible to all residential construction on all four (4) sides of the lot. Noise, aesthetic blight, glare, reflection, night time lighting, traffic, sirens, and associated PM2.5 emissions are inconsistent with surrounding land uses.

Redondo Beach Code Conformance

The current BCHD at 312,000 sqft does not appear to conform with existing Redondo Beach code for issuance of a Conditional Use Permit. The proposed 793,000, 6-story senior apartments and 8-story, 800+ car parking structure violate the following RBMC section based on height, noise, invasion of privacy, and excess generated traffic.

10-2.2506 Conditional Use Permits.

(a) Purpose. The purpose of a Conditional Use Permit shall be to review certain uses possessing unique characteristics, as listed in Article 2 of this chapter, to **insure that the establishment or significant alteration of those uses will not adversely affect surrounding uses and properties** nor disrupt the orderly development of the community. The review shall be for the further purpose of stipulating such conditions regulating those uses to assure that the criteria of this section shall be met.

(b) Criteria. The following criteria shall be used in determining a project's consistency with the intent and purpose of this section:

2. Response to Comments

(1) The site for the proposed use shall be in conformity with the General Plan and shall be adequate in size and shape to accommodate such use and all setbacks, spaces, walls and fences, parking, loading, landscaping, and other features required by this chapter to **adjust such use with the land and uses in the neighborhood**.

(2) The site for the proposed use shall have adequate access to a public street or highway of adequate width and pavement to carry the quantity and kind of traffic generated by the proposed use.

(3) **The proposed use shall have no adverse effect on abutting property or the permitted use thereof.**

O3. Response to Comments from the StopBCHD, dated September 19, 2024.

O3-1 This comment is in support of a maximum FAR of 0.75 for the P/I land use designation for BCHD and raises concerns for the preservation of neighborhood character and property value. As discussed in the General Plan Update and DPEIR, implementation of goals and policies would ensure that community character is preserved and consistent with existing uses. Policy LU-2.2 and Policy LU-2.3 would ensure that new projects are compatible with their adjacent neighborhoods. Additionally, goal LU-3 would preserve and improve the character and integrity of existing neighborhoods and districts. As discussed in Section 5.1, *Aesthetics*, of the DPEIR, the City also adopted Objective Residential Standards that provide criteria to maintain residential neighborhood character and ensure new or renovated residential developments are compatible with existing development. Additionally, changes to land use designation analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

2. Response to Comments

LETTER O4 – Mark Nelson

Comment Letter O4

Outlook

Fwd: Public Comment - Agenda Item J1 Planning Commission

From Stop BCHD <stop.bchd@gmail.com>
Date Thu 2024-09-19 5:45 PM
To Marc Wiener <Marc.Wiener@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; CityClerk <CityClerk@redondo.org>; Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>

CAUTION: Email is from an external source; ***Stop, Look, and Think*** *before opening attachments or links.*

Distribute to City Council and Planning Commissioners

Mark Nelson
Representing the participants of StopBCHD.com

First, I remind the commission that BCHD had a $200K per year consultant as the chair of the General Plan Advisory Committee. An enviable position for a pending major developer like BCHD. I wonder if CenterCal or CBRE will sponsor the next GPAC chair? O4-1

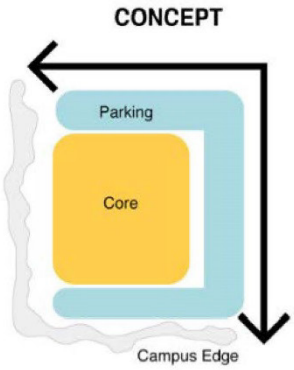
Thank you to Planning staff. Staff's exhibit on pages 99-113 clearly demonstrates the outlier that a 1.25 FAR would be in the public/institutional sector. It also shows excessive developments in other land uses.

BCHD demonstrated to the Community Working Group an FAR 1.95, 793,000 sqft project with 80% to 95% non-resident users according to BCHD's consultant analysis, BCHD's allcove state funding grants, and the national PACE association's analysis. StopBCHDs FAR analysis of P-CF in 2020 also concluded that BCHD was an outlier and that the future development should be restricted to the current FAR via the PCDR process.

We support a MAXIMUM 0.75 FAR for P/I. We are sympathetic to the City of Redondo Beach's needs and due to its nearly 100% service to residents of the City, we can support a higher FAR for the City. The City is also a trustworthy counterparty, unlike our experience with BCHD. O4-2

In May of 2017, at the very first CWG meeting, BCHD committed to protecting surrounding property owners and neighborhoods by building in the center of the campus. (ref, p 25 of 5/2017). BCHD broke that commitment immediately and now plans to MAXIMIZE local damage by building exclusively on the perimeter that it swore to protect. BCHD proposes a 110-feet above Beryl St, 110-150-feet above the Torrance homes on the east, 80-100 feet above the homes on Diamond with a giant parking structure, and 75-100 feet above Prospect homes. Clearly, we cannot leave any facet of BCHD development to chance.

Healthy Living Campus Parking Approach



We urge the City of limit FAR to 0.75 for P/I.

O4-2
Cont'

2. Response to Comments

O4. Response to Comments from Mark Nelson dated September 17, 2024.

O4-1 This comment is from Mark Nelson on behalf of the StopBCHD organization. This comment acknowledges BCHD involvement in the General Plan Advisory Committee. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

O4-2 This comment is in support of a maximum FAR of 0.75 for the P/I land use designation. Changes to land use designation analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER O5 – Mark Nelson

Comment Letter O5

Outlook

Public Comment - 0.75 FAR for P/I Land Use is consistent with protecting surrounding neighborhoods

From Mark Nelson
Date Tue 2024-09-17 10:05 PM
To Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; CityClerk <CityClerk@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>; TRAO News <traonews@gmail.com>

CAUTION: Email is from an external source; ***Stop, Look, and Think*** *before opening attachments or links.*

Based on the FAR analysis tables in the Planning Commission Agenda Packet beginning on Page 99, it's clear that 1.25 FAR is an outlier and creates eyesores that are inconsistent with neighborhoods. P/I should have a maximum FAR of 0.75 with a grandfather for current structures at their current FAR if it exceeds 0.75. One only needs to look at the FARs above 1.0 in the provided data to understand the magnitude of the mistake of allowing an FAR above 0.75. O5-1

Mark Nelson
Property Owner
StopBCHD.com

2. Response to Comments

O5. Response to Comments from Mark Nelson dated September 17, 2024.

O5-1 This comment is from Mark Nelson on behalf of StopBCHD organization. This comment is in support of a maximum FAR of 0.75 for the P/I land use designation. Changes to land use designation analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER O6 – Mark Nelson

Comment Letter O6

Outlook

BCHD's Lot Size is Incorrect in the Table.

From Mark Nelson
Date Tue 2024-09-17 8:19 PM
To Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; CityClerk <CityClerk@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>

CAUTION: Email is from an external source; ***Stop, Look, and Think*** *before opening attachments or links.*

Public Comment - Redondo Beach City Council, Planning Commission, General Plan record.

406626 sqft is 9.33 acres. BCHD stated in its preliminary CUP, and the City of Redondo Beach did not comment, that the site is 9.94 acres, or 432986 sqft. That yields an FAR of 0.72. I presume that BCHD had a current survey completed and update the prior +/- that was measured in the 1950s manually. BCHD's Murdoch consultant either misled the City or can provide evidence to support his filing.

From Page 2 of the 2/2022 BCHD drawing set submitted in good faith to the City by BCHD

AIN:	7502-017-903
ZONING DISTRICT	P-CF COMMUNITY FACILITY ZONE
LAND USE:	P PUBLIC OR INSTITUTIONAL
AREA:	9.94 ACRES

Address	Existing Use	Proposed FAR (CC approved)	Lot Area SF	Building SF	Existing FAR	Aerial View	Street View
514 N Prospect	PI-BCHD	0.75	406,626.00	312600	0.77		

O6-1

2. Response to Comments

O6. Response to Comments from Mark Nelson dated September 17, 2024.

O6-1 This comment is from Mark Nelson on behalf of the StopBCHD organization. This comment provides information on BCHD and claims that the site is 9.94 acres which yields a FAR of 0.72. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER R1 – Geoff Gilbert

Comment Letter R1

From: Geoff Gilbert
To: Planredondo; CityClerk; Sean Scully
Cc: [redacted] Rosann Taylor; [redacted] Todd Loewenstein; [redacted] Margaret Mckenzie; Mark Nelson (Home Gmail); Paige Kaluderovic; Nils Nehrenheim; Robert Ronne; Residents Against Overdevelopment
Subject: Opposing BCHD"s request for exemption of the proposed FAR limits for its Healthy Living Campus
Date: Thursday, August 15, 2024 2:53:14 PM

You don't often get email from [redacted] Learn why this is important

*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

To the Planning Commission and all concerned;

The Redondo Beach Planning Commission has been working on long term goals and policies for the City's development for the next 30 years.
No easy crystal ball fortune telling here, but a deliberate, critical undertaking to shape and prepare our city for the next two or three generations and beyond.
So, I agree with the proposed 0.75FAR limitations (and the exception of 1.25FAR for City Hall and Planning Commission Annex). We do not have room for "urban sprawl" and increasing the density of development will negatively affect our community.

R1-1

Beach Cities Health District, however, seeks exemption from the 0.75FAR for its "Healthy Living Campus" and has lobbied the public and media for support to pressure the City to allow it to have the same 1.25FAR proposed for the City buildings. It claims the 0.75FAR would prevent it from constructing Phase I of its HLC, thus "limiting health uses on our campus". BCHD's attorney stated the FAR "limits the District's ability to modernize the seismically deficient facility and will result in a reduction of services for the community". Furthermore, that, "it's not uniformly applied" and "*attacks* a particular project", the HLC.

BCHD goes on telling the public what's at risk if the 0.75FAR is approved; the already existing allcove project and Fitness Center. These are good components of BCHD's business but they are already housed in the 514 Building and can be moved almost anywhere. They are really not at risk, nor are the other community health services of BCHD.

What is at risk, and what BCHD continues to deliberately fail to *fully and publicly* explain to the public and media is the Residential Care Facility for the Elderly which is the primary focus of HLC Phase I.

Unlike the Beach Cities Hospital which the citizens voted on to create for the community, this RCFE is a commercial development, to be controlled and operated by a third party developer using our public land and tax dollars. It is not being created specifically for our Beach Cities residents like the former hospital, but for anyone who can afford its premium cost. BCHD weakly explains that any revenue it receives from the developer would essentially trickle down to unspecified services to the Beach City

R1-2

2. Response to Comments

community. These unspecified services, if any, are the "health uses" that might be at risk.
The "seismically deficient" buildings are not unsafe. They just do not meet the current seismic building codes, much like most of the public buildings and schools in LA County. This is backed up by BCHD's own seismic consultant. The seismic issue is again a scare tactic BCHD is using to build its RCFE.
The HLC RCFE therefor is exactly like other commercial assisted living businesses such as Kensington, Sunrise, Oakmont, etc., etc., etc. BCHD's RCFE must follow the same FAR limits as any other commercial development.
BCHD has not, cannot, give real support to its "warning" that the FAR will "limit health uses" . It has enough resources to maintain its commendable community projects.
.
Finally, the voters of Redondo Beach, Hermosa Beach and Manhattan Beach did not approve the construction of the HLC as they did the original hospital.
Yet, like the hospital that failed under the management of BCHD, the residents will be fiscally liable for the HLC for well over the next 30 years.

Do not make any FAR exceptions to the BCHD HLC commercial development project which meets no standards whatsoever to allow such a waiver.

Sincerely,
Geoff Gilbert
Redondo Beach

R1-2
Cont'

R1. Response to Comments from Geoff Gilbert, dated August 15, 2024.

R1-1 This comment acknowledges the City's efforts for long-term goals and policies for development for the next 30 years. The comment is in agreement with the proposed FAR for the BCHD land use designation and states that increasing the density of development will negatively affect the community. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

R1-2 This comment notes BCHD's goal to seek exemption from the proposed FAR and summarizes the efforts made by the BCHD to oppose the FAR under its land use designation. The comment requests that no exceptions are made to FAR for the BCHD land use designation. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

2. Response to Comments

LETTER R2 – Mark Nelson

Comment Letter R2

From: Mark Nelson (Home Gmail)
To: Planredondo; Planning Redondo; Sean Scully
Subject: PUBLIC COMMENT - Fwd: Gallup study PRA - Lack of Socioeconomic Controls in the Gallup Study
Date: Thursday, August 15, 2024 10:53:46 PM

*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

Public Comment - Planning Commission - BCHD's vendor Gallup's lack of evidence-based analysis

This California Public Records Request is in and waiting for a response from BCHD's vendors.

---------- Forwarded message ---------
From: **Mark Nelson (Home Gmail)** <[redacted]
Date: Thu, Aug 15, 2024 at 4:04 PM
Subject: Gallup study PRA - Lack of Socioeconomic Controls in the Gallup Study
To: PRR <[redacted] Communications <[redacted]
<[redacted] info <[redacted]

Provide documents demonstrating the statistical control for the following variables directly impacting health levels and outcomes:

	BCHD	US	BCHD
HH Income	$157.0K	$74.6K	Twice the HH Income of the National average
No Health Coverage	2.4%	7.9%	One-third of the lack of Health Coverage as the Nation
Poverty Rate	5.0%	11.5%	Less than one-half the National poverty rate

These factors are causal for health outcomes and are unrelated to BCHD.

"Across the lifespan, residents of **impoverished communities are at increased risk** for mental illness, chronic disease, higher mortality, and lower life expectancy.9,13–17 Children make up the largest age group of those experiencing poverty.18,19 **Childhood poverty** is associated with developmental delays, toxic stress, chronic illness, and nutritional deficits.20–24 Individuals who experience childhood poverty are more likely to experience poverty into adulthood, which contributes to generational cycles of poverty.25 In addition to lasting effects of childhood poverty, **adults living in poverty are at a higher risk of adverse health effects from obesity, smoking, substance use, and chronic stress**.12 Finally, **older adults with lower incomes** experience higher rates of disability and mortality.6 One study found that men and women in the top 1 percent of income were expected to live 14.6 and 10.1 years longer respectively than men and women in the bottom 1 percent."

https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries

Institute of Medicine (US) Committee on the Consequences of Uninsurance. Care Without

R2-1

Coverage: Too Little, Too Late. Washington (DC): National Academies Press (US); 2002. 3, Effects of Health Insurance on Health. Available from: https://www.ncbi.nlm.nih.gov/books/NBK220636/

Barakat C, Konstantinidis T. A Review of the Relationship between Socioeconomic Status Change and Health. Int J Environ Res Public Health. 2023 Jun 29;20(13):6249. doi: 10.3390/ijerph20136249. PMID: 37444097; PMCID: PMC10341459.

R2-1
Cont'

2. Response to Comments

R2. Response to Comments from Mark Nelson, dated August 15, 2024.

R2-1 This comment raises concerns regarding impacts to health levels and outcomes. This comment also provides information and links for more information on the relationship between socioeconomic status and health. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

.

LETTER R3 – Mark Nelson

Comment Letter R3

From: Mark Nelson (Home Gmail)
To: Communications; Jane Diehl; Michelle Bholat; Noel Chun; Martha Koo; Planredondo; Planning Redondo; Paige Kaluderovic; Nils Nehrenheim; Todd Loewenstein; Scott Behrendt; Zein Obagi; Sean Scully
Subject: Public Comment - Planning Commission - OPPOSE BCHD"s HLC Plans for FAR of 1.83
Date: Thursday, August 15, 2024 4:24:49 PM

*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

Per BCHD's planning documents, it seeks a 792,500 sf buildout which yields an FAR of 1.83. With all facilities built at 100-feet or more above the adjacent residential land uses, that is TOTALLY UNACCEPTABLE both in density and height.

Because 99.7% of the entire campus square feet and 99.4% of the hospital square feet are under 52-feet tall, BCHD should be limited to 52-feet with deep setbacks to respect the natural elevated terrain.

An FAR of 0.5 would be the most consistent with the surrounding residential and commercial land uses.

R3-1

2. Response to Comments

R3. Response to Comments from Mark Nelson, dated XX, 2024.

R3-1 This comment raises concerns for BCHD's proposed FAR compared to the proposed FAR presented in this DPEIR. The commenter suggests a 0.5 FAR in order to be most consistent with surrounding uses. Changes to land use designation, including changes to FAR presented in the DPEIR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are required. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER R4 – Mark Nelson

Comment Letter R4

From: Mark Nelson (Home Gmail)
To: Sean Scully; Planredondo; Planning Redondo; CityClerk
Subject: Public Comment - Planning Commission
Date: Thursday, August 15, 2024 7:45:54 PM

*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

Regarding Public/Institutional Land Use

We have been considering 0.75 and 1.25 FAR for P/I

I would like to add 0.5 FAR as well into consideration. Many, if not all, P/I sites are surrounding by commercial or residential, both of which are either FAR 0.5 or equivalent. The use of a 0.5 FAR would avoid character assassination of the surrounding neighborhoods.

An FAR bonus system could be used, based on the proposed resident use of the site. For example, City of Redondo Beach facilities are typically used by and benefit residents and that could provide a large FAR bonus. Other facilities, such as a regional jail facility, would get its bonus, if any, based on the fraction of use by the City of Redondo Beach and its residents.

Alternatively, bad development actors could also be managed by requirements in the Zoning requirements. Dynamic height limits could be set by the surrounding property height limits. Setbacks could be a percentage, such as 10% of lot depth with a maximum of 50-feet, as an example.

Unfortunately, I don't know how to assure that these types of Zoning restrictions are assured implementation following the General Plan process and approval.

I'm inclined to limit the FAR to 0.5 or 0.75 to manage the protection of surrounding neighborhoods, unless objective restrictions could be assured during Zoning implementation.

R4-1

2. Response to Comments

R4. Response to Comments from Mark Nelson, dated August 15, 2024.

R4-1 This comment raises concerns for potential changes of character of surrounding neighborhoods associated with a proposed FAR of 0.75 for the P/I land use designation. The comment requests consideration of 0.5 FAR for the P/I land use designation. As discussed in the General Plan Update, and thus the DPEIR, implementation of goals and policies would ensure that community character is preserved and consistent with existing uses. Policy LU-2.2 and Policy LU-2.3 would ensure that new projects are compatible with their adjacent neighborhoods. Additionally, goal LU-3 would preserve and improve the character and integrity of existing neighborhoods and districts. As discussed in Section 5.1, *Aesthetics*, of the DPEIR, the City also adopted Objective Residential Standards that provide criteria to maintain neighborhood character and ensure new or renovated residential developments are compatible with existing development. Additionally, changes to land use designations analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER R5 – Mark Nelson

Comment Letter R5

From: Mark Nelson (Home Gmail)
To: Sean Scully; Planning Redondo; Planredondo; CityClerk
Subject: PUBLIC COMMENT: BCHD Apparently Misled the State in its Funding Application for allcove
Date: Monday, August 19, 2024 2:14:44 PM

*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

Public Comment: City Council, Planning Commission, General Plan

In order to make the Beach Cities Health District more attractive to State investment (likely reason), BCHD included areas of lower income, racial diversity, healthcare provider shortage areas (HPSA) and disadvantaged communities (DC) to its largely White and affluent resident base. Sadly, BCHD has only provide token benefit to the MHSA and DC communities with allcove.

The District consists of Hermosa, Manhattan and Redondo Beach with an average household income of $157,000 per year and a 68.1% White residency. In order to be more attractive for grant purposes (likely reason) BCHD added more diverse cities from SPA8.

The allcove program currently services enrollees that are 74% Hermosa, Redondo, Manhattan, and Torrance. That allcove area has an average household income of $145,000 and is 59.4% White. That is still a solid majority of the demographics that BCHD seems to sought to dilute

However, the 14 SPA8 cities that represent the mental Healthcare Provider Shortage Areas and the Disadvantaged communities have only a household income of $74,000 annually (50% of the current allcove 4-city supermajority), are 75.8% of the SPA8 population (compared to under 20% for the 4-cities), only receive 13.4% of allcove services (compared to 74% of the 4-cities) and are 80.6% non-White.

Based on statistics alone, BCHD appears to have diversity-washed its allcove service area, but failed to provide any meaningful level of services to the downtrodden of SPA8. Further, an Uber RT from Long Beach, the largest constituent of allcove, is approximately $70. Those youth, along with many of the other disadvantaged communities, are economically deprived of participation. BCHD's philosophy of allcove at the beach is disingenuous and continues to keep the segregation of income, race, and health care availability alive and well.

R5-1

FROM BCHDs FUNDING APPLICATION - BCHD HAS FAILED TO SERVICE THE DISADVANTAGED IN ANY MEANINGFUL WAY

FROM BCHD FILING WITH THE STATE OF CALIFORNIA
7. Describe State Priorities
Please describe how your project meets the priorities you have selected above (limit 500 words).
allcove Beach Cities targets 7 of the required state priorities:

2. Response to Comments

Invest in behavioral health and community care options that advance racial and geographic equity: Through funding from
California's Mental Health Services Oversight and Accountability Commission, BCHD is opening allcove Beach Cities this fall
to expand services to communities in Service-Planning Area 8, including 16 cities and communities of the City of Los
Angeles, which includes more than 1,000,000 people. **allcove Beach Cities will be able to provide services to those 12-25
years old, including 49% Latino population, followed by 26% white, 15% Asian, 8% African American and 2% other.**
Address urgent gaps in the care continuum for people with behavioral health conditions, including children and youth: While

R5-1
Cont'

R5. Response to Comments from Mark Nelson, dated August 19, 2024.

R5-1 This comment states that BCHD has failed to service the disadvantaged and provides background information on BCHD and its funding application. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

2. Response to Comments

LETTER R6 – Frank Briganti

From: CityClerk
To: Planning Redondo
Subject: FW: BCHD massive buildings Project:
Date: Monday, August 19, 2024 4:21:40 PM

Hello,

Our apologies, we missed this public communication for the August meeting. It can be added to the next one under public comment.

Thank you,

Melissa Villa
Analyst
City of Redondo Beach | City Clerk's Office
415 Diamond Street | Redondo Beach, CA 90277
[redacted]

Comment Letter R6

-----Original Message-----
From: Frank Briganti <[redacted]
Sent: Thursday, August 15, 2024 10:05 AM
To: CityClerk <[redacted]
Subject: Re: BCHD massive buildings Project:

CAUTION: Email is from an external source; Stop, Look, and Think before opening attachments or links.

FOR PUBLIC. RECORD & COMMENT
*****For Aug 15,24 Planning Comm Meeting.* 1. Concerns & Questions:
No consideration for 300+ homes & Towers School regarding **Skyline (HillSide Comm). ** West Torrance PSB within the High Buildings area.
Codes.
No documented safe guards(hazardous medical waste,dust,noise, traffic,etc) for the West surrounding homes!
Allocove structure -Beryl/Flagler(Torr), capped oil well , no documented water table & soil EPAreports. & No traffic/pedestrian impact studies?
This area had been CONTAMINATED WITH BENZENE, TRICHLORETHYLENE, ETC from dry cleaning Bussiness in Von,s area!
This serves NO Health issues to the Southbay residents (RB,HB, MHB) Taxed!
The extended building will be a continued to be revenue$$$$ generating money for BCHD administration .ex, Silverado, medical, lab ,radiology, pharmacy, urgent care, surg center etc. Providence is a revenue source.
Need a forensic audit of BCHD financial BOOKS. - Admin Salaries, Lawyers, PR firms, etc.
This is a Project for a PRIVATE(100%) company?

R6-1

THE 0.5 factor would be the right start , TOsee how this goes for EVERYONE!!!!
THANKS Dr. Frank Tomlee av

R6-2

Sent from my iPad

R6. Response to Comments from Frank Briganti, dated August 15, 2024.

R6-1 This comment raises concerns for general health issues associated with uses from the BCHD campus. As discussed in Section 5.8, *Hazards and Hazardous Materials*, this site is not identified as a hazardous site, and implementation of regulatory compliance governing use and transport of hazardous materials would be required for future development. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

R6-2 The commenter suggests a FAR of 0.5 for the P/I land use designation. Changes to land use designations analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

2. Response to Comments

LETTER R7 – Charlie S.

Comment Letter R7

From: Charlie S
To: Planning Redondo; CityClerk
Cc: Sean Scully; Eleanor Manzano
Subject: RE: BCHD issue is FAR beyond floor space
Date: Sunday, August 18, 2024 4:11:58 PM
Importance: High

You don't often get email from [redacted] Learn why this is important

*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

I would like to understand why my comment below is not shown in the Planning Commission Meeting Minutes on the date of the email.
Thanks, Charlie Szymanski

From: Charlie S <[redacted]
Sent: Thursday, August 15, 2024 1:39 PM
To: [redacted]
Cc: 'Charlie Szymanski' <[redacted] 'Sean Scully' <[redacted]
Subject: BCHD issue is FAR beyond floor space
Importance: High

Dear Commission and Residents:

Plain and simple, Redondo Beach should not be in the passive real estate business. Any public lands and services should be directed to consumptive services for residents or alternatively as chartered.

What I mean by that is that day in and day out our residents need active support from all city resources, whether city employees and staff, our contractors, including for example LA County Lifeguards, and so forth, and any other services paid for and designated for the benefit of taxpayers and residents. Every day or frequently the resources are mostly used up for residents' benefit. Health care in the US being primarily a free market, visionaries decades ago designated this approximately 11 acres toward the everlasting benefit of health improvement for residents. Because the commitment was larger than supportable, other communities were also designated participants. R7-1

When you look at health care, it is the ultimate in a consumptive service. When you use the resources including personnel, equipment, and land and so forth, all that is left is better health and living residents. One could argue that this is the ultimate in good things. The land should be designated for the highest benefit of daily resident users for their benefit or their health. Here we see an organization that wants to use a great deal of 11 acres to benefit a few hundred paying individuals as a passive investment. The greatest good use for this land would be if it can benefit the greatest number of residents in the designated communities. This is FAR BELOW the best benefit of this land to the communities and the about 120,000 individuals to be served. BCHD should not be in the real estate business, no matter who the residents are nor how they benefit. We should have facilities and space to R7-2

serve the active health of the beneficiaries. Discussing FAR for this property is quite appropriate, and as public land the FAR should be less, as it's institutional in nature and esthetics and legacy matter. But limiting the discussion to FAR misses the bigger picture of APPROPRIATE USE FOR THE BENEFIT OF THE COMMUNITY'S HEALTH. Read the Charter and Mission Statement of BCHD; you will find this enterprise does not suit them.

R7-2
Cont'

Charlie Szymanski

[redacted]
Nehrenheim

2. Response to Comments

R7. Response to Comments from Charlie S., dated August 18, 2024.

R7-1 This comment raises concerns regarding the adequacy of City services and resources and emphasizes health care services that would benefit the community. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

R7-2 This comment states that as public institutional land, FAR should be less than that proposed under the General Plan buildout. Changes to land use designations analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

2.1 PROPOSED CHANGES TO GENERAL PLAN UPDATE

In addition to the comment letters received on the DPEIR, this section of the FEIR also notes the recommendations from planning staff on proposed changes to General Plan Update and provides responses on the effect of the proposed changes to conclusions presented in the DPEIR.

- In response to public comments and planning staff's recommendations proposed changes/edits are being made to the Land Use Element and Implementation Actions. The proposed text updates to the policies and implementation actions of the Land Use Elements do not change the conclusions reached by the DPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- In response to a letter submitted to the City by the Redondo Beach Unified School District (RBUSD) on the General Plan Update (dated July 17, 2024), revisions have been made to change the proposed land use designation of Open Space (OS) to Public Institutional (PI) at the Lincoln Elementary School Fields and Blacktop Area, the Alta Vista Elementary School Fields, and the former Franklin School Site. This change to the proposed land use does not change the analysis or impact conclusion of the FPEIR as the three subject properties are currently designated as Public Institutional (PI), which is consistent with the current and future intended use of the property. These three sites were not factored into the open space calculations included in the Open Space and Conservation Element and reverting the properties back to their original designation will have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- Planning staff is recommending to leave the existing Public or Institutional (P) designation of the AES powerplant site and the SCE ROW sites and not amend their designation to Public Utility (PU) as proposed by the Planning Commission. The current General Plan includes a "P" (Public or Institutional) designation for the AES powerplant site and the SCE ROW and the only permitted uses allowed by the Zoning Ordinance and LCP for the AES site are park/open space and utilities. The SCE ROW also conditionally permits agricultural uses, parking lots, and accessory structures in addition to the uses allowed on the AES site. The updated General Plan had proposed to change these properties to a newly created designation, Public Utility (PU), which is defined as providing "for utility uses including easements with public access for recreation and parking." Since the time that this designation was created, the powerplant has been decommissioned and is no longer in operation. Additionally, some changes are likely to the associated SCE ROW infrastructure in the future. Staff therefore recommends maintaining the original (existing) designation of these properties as "P" (Public or Institutional), which provides Governmental administrative and capital facilities, parks, schools, libraries, hospitals and associated medical offices, public cultural facilities, public open space, utility easements, and other public uses. Therefore, maintaining the original/existing designations for these properties will have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- In response to the Planning Commission's recommendations to reduce the proposed FAR associated with the Public Institutional land use designation from 0.75 to 0.50 FAR, the General Plan and Zoning Ordinance currently does not place a cap on the FAR for most of the PI zones, with the exception of City Hall and the Annex located on the northeast corner of PCH and Vincent Street, which have a FAR of 1.25. As discussed in detail in Appendix B, *Buildout Methodology*, of the FPEIR, existing uses in the Public Institutional land use category where the FAR in the proposed Land Use plan was set to 0.75 include: 12

public schools, 1 private school, 2 fire stations, a water storage facility and adjacent open space area, the City Yard, the parking lot in Riviera Village, the North Redondo Beach Library, the Kensington Assisted Living Community (developed on school property), and Beach Cities Health District. Estimates for existing uses on public and private school sites and the library range from 0.15 FAR to 0.37 FAR. Other uses (water towers, parking lots, and City Yard) range from 0.00 to 0.09 FAR. The two fire stations are built at 0.28 and 0.53 FAR, respectively. Therefore, reducing the proposed FAR from 0.75 to 0.5 would have no material effect on the FPEIR.

- In response to planning staff's recommendations, to change the proposed C-4 land use designation to C-2 for sites fronting Pacific Coast Highway (PCH), The proposed C-4 land use designation includes a FAR of 1.00 and the same uses proposed under the C-2 land use designation. The C-2 land use designation allows for a FAR of 0.50. Therefore, this change would not result in modifications to the conclusion disclosed in the FPEIR.
- In response to the Planning Commission's and planning staff's recommendations, revisions have been made raise the proposed minimum non-residential FAR from 0.35 to 0.40 for all Mixed-Use land designations. This revision would have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- In response to the Planning Commission's and planning staff's recommendations, revisions have been made to revert all proposed Utility (U) designations to their existing Public (P) designation. The proposed Public/Utility (U) land use designation provides for utility uses including easements with public access for recreation and parking is similar in use and intensity to the Public (P) designation. Maximum FAR 0.10. Therefore, this revision would have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).

3. Revisions to the Draft PEIR

3.1 INTRODUCTION

This section contains revisions to the DPEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DPEIR publication; and/or (3) typographical errors.. Changes made to the DPEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions. This section also includes revisions to additional documents that are part of the proposed project (e.g., technical reports, existing conditions reports, etc.).

The revisions made to the DPEIR merely provide clarification and amplification of issues and impacts already addressed in the DPEIR, and do not disclose any new or more severe impacts. As such, none of the information proposed to be added to the DPEIR is significant new information requiring recirculation pursuant to Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5.

3.2 REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments and recommendations received during the public comment period and Planning Commission hearings.

In response to Letter A3, page 5.6-29, *References*, of the DPEIR, was revised to add references to the State Tsunami Hazard Area Maps and ASCE Tsunami Design Zone Maps.

California Geological Survey (CGS) and the California Governor's Office of Emergency Services. 2021. Tsunami Hazard Area Map for Los Angeles County. Multiple scales. https://www.conservation.ca.gov/cgs/tsunami/maps.

American Society of Civil Engineers (ASCE). 2021. ASCE Tsunami Hazard Tool. https://asce7tsunami.online/.

In response to Letter A3, Figure 5.9-3, *Tsunami Hazards Areas in Redondo Beach*, of the DPEIR, has been revised for accuracy. The following text has been added to address changes.

Tsunami

The southwestern portion of the City is in a State of California Tsunami Hazard ~~Inundation~~ Zone Area, as shown in Figure 5.9-3, *Tsunami Hazards Areas in Redondo Beach* ~~(CDOC 2009)~~ (CGS 2021). Tsunamis are a series of large ocean waves generated by large undersea disturbances, such as a major earthquakes or landslides on the sea floor. Tsunamis are not affected by tides or currents—in a tsunami, the whole column of water is moving, not just the surface. When tsunami waves enter shallow water, they rise to form massive moving water

columns called "run-up." The run-up of water many feet high rushes onto shore, striking the coast with tremendous destructive force.

In response to Letter A3, Section 5.9, Hydrology and Water Quality, of the DPEIR, the following text has been added to address new figures added to the chapter.

Tsunami

The southwestern portion of the City is in a State of California Tsunami Hazard ~~Inundation~~ Zone Area, as shown in Figure 5.9-3, *Tsunami Hazards Areas in Redondo Beach* ~~(CDOC 2009)~~ (CGS 2021). Tsunamis are a series of large ocean waves generated by large undersea disturbances, such as a major earthquakes or landslides on the sea floor. Tsunamis are not affected by tides or currents—in a tsunami, the whole column of water is moving, not just the surface. When tsunami waves enter shallow water, they rise to form massive moving water columns called "run-up." The run-up of water many feet high rushes onto shore, striking the coast with tremendous destructive force.

Coastal areas in Los Angeles County are vulnerable to both local (<621 miles away) and distant-source tsunamis, although a local tsunami would be more devastating and could reach the coast in less than 30 minutes after the initial earthquake. The source of most local-source tsunamis will be earthquakes and landslides off the Cascadia subduction zone, the closest subduction zone to the California coast (LACOES 2006). According to the City's LHMP, approximately 600 households and nine key facilities in the City are within the Tsunami Inundation Zone Area (Redondo Beach 2020).The National Weather Service monitors for tsunamis and facilitates the tsunami warning system to alert areas that may face tsunamis. The Redondo Beach Fire Department also provides information for evacuation routes in the City and a guide for tsunami safety and awareness on its website (RBFD 2024). Provisions in the City's LCP, RBMC, and LHMP include requirements for development in order to reduce the effects of tsunami flooding hazards. Additionally, the ASCE Standards Committee has developed Chapter 6, Tsunami Loads and Effects, which provides standards to five western states, including California, for building design and other structures to withstand the effects of tsunamis. See Figure 5.9-3, *ASCE Tsunami Design Zone in Redondo Beach*, which showcases appropriate tsunami design zones in the city (ASCE 2021).

In response to Letter A3, pages 5.9-43 through 5.9-44, *References*, of the DPEIR, references have been revised for accuracy.

~~California Department of Conservation (CDOC). 2009. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles.~~

California Geological Survey (CGS) and the California Governor's Office of Emergency Services. 2021. Tsunami Hazard Area Map for Los Angeles County. Multiple scales. https://www.conservation.ca.gov/cgs/tsunami/maps.

American Society of Civil Engineers (ASCE), 2021. ASCE Tsunami Hazard Tool. https://asce7tsunami.online/.

———. 2015. ASCE 7 Tsunami Loads and Effects Design Standard. https://ascelibrary.org/doi/10.1061/9780784479117.124#:~:text=The%20Tsunami%20Loads%20and%20Effects%20Subcommittee%20of,and%20Effects%20chapter%20will%20become%20the%20first.

Los Angeles County Office of Emergency Management (LACOES). 2018, June ~~2006, March 29~~. Los Angeles County Operational Area Emergency Response Plan, Tsunami Annex. https://ceo.lacounty.gov/wp-content/uploads/OEM/Tsunami%20Annex.pdf.

In response to Letter A3, page 5.13-1 through 5.13-15, *Bibliography*, of the DPEIR, have been revised for accuracy.

~~California Department of Conservation (CDOC). 2009. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles.~~

California Geological Survey (CGS) and the California Governor's Office of Emergency Services. 2021. Tsunami Hazard Area Map for Los Angeles County. Multiple scales. https://www.conservation.ca.gov/cgs/tsunami/maps.

American Society of Civil Engineers (ASCE), 2021. ASCE Tsunami Hazard Tool. https://asce7tsunami.online/.

———. 2015. ASCE 7 Tsunami Loads and Effects Design Standard. https://ascelibrary.org/doi/10.1061/9780784479117.124#:~:text=The%20Tsunami%20Loads%20and%20Effects%20Subcommittee%20of,and%20Effects%20chapter%20will%20become%20the%20first.

Los Angeles County Office of Emergency Management (LACOES). 2018, June ~~2006, March 29~~. Los Angeles County Operational Area Emergency Response Plan, Tsunami Annex. https://ceo.lacounty.gov/wp-content/uploads/OEM/Tsunami%20Annex.pdf.

The following are proposed changes/edits to the Draft "Land Use Element" for the City Council's consideration as recommended by the Planning Commission at their public hearings on August 1, 2024 and September 19, 2024.

Global Changes throughout the DPEIR. The following text has been revised to reflect changes in the General Plan Update.

- **Policy LU-1.11 Creation and Distribution of Parkland**. Promote the creation of new open space and community serving amenities throughout Redondo Beach to achieve minimum parkland standards and to keep pace with the increase in multi-unit housing development. This policy includes specific prioritization of opportunities at the current power plant site and powerline right of ways. Additionally, the City will prioritize opportunities for parkland expansion in park deficient areas. The Housing Element indicates there will be 9,400 new residents by 2040 with full development buildout. If Redondo Beach does not increase its park acreage (current total equals 148.8 acres), instead of the current 3.1 acres per 1,000 residents (low ratio by many standards) the City will only have 1.9 acres per 1,000 residents. Locations of additional parkland sites is essential for the city to maintain its existing parkland ratio.

3. Revisions to the Draft EIR

Page 5.4-13, Section 5.4.3*, Proposed General Plan Goals and Policies*, of the DPEIR, was revised to reflect changes in the General Plan Update.

- **Policy LU-7.1: Historic landmarks and districts.** Encourage the voluntary designation of potentially historic resources as landmarks or historic districts. Strengthen the City's objective identification of potentially historic buildings, resources, landmarks, or historic districts in residential, commercial, public/institutional, and industrial zones.

Page 5.9-29, Section 5.9.3, *Proposed General Plan Goals and Policies*, of the DPEIR, was revised to reflect changes in the General Plan Update.

- **Policy LU-5.10 Develop a Green Infrastructure Plan.** Green infrastructure is an approach to water management that protects, restores, or mimics the natural water cycle. Green infrastructure is effective, economical, and enhances community safety and quality of life. It means planting trees and restoring wetlands rather than building a costly new water treatment plant.

Page 5.16- 6, Section 5.16.3, *Proposed General Plan Goals and Policies*, of the DPEIR, was revised to reflect changes in the General Plan Update.

- **Policy LU-7.1: Historic landmarks and districts.** Encourage the voluntary designation of potentially historic resources as landmarks or historic districts. Strengthen the City's objective identification of potentially historic buildings, resources, landmarks, or historic districts in residential, commercial, public/institutional, and industrial zones.

Page 5.11-49, Section 5.11, *Noise*, of the DPEIR, was revised to address a typographical error in the impact statement which should state 5.11-3.

Implementation of Mitigation Measures N-2 and N-3 would reduce Impact ~~5.13-3~~ 5.11-2 to less-than-significant levels.

Page 3-4, Section 5.13.1, *Fire Protection and Emergency Services*, of the DPEIR, was revised to address a typographical error in the impact statement which should state 5.13-1.

Impact 5.1~~5~~3-1: The proposed project would introduce new structures and residents into the Redondo Beach Fire Department service boundaries, thereby increasing the requirement for fire protection equipment and personnel. [Threshold FP-1]

Appendix I General Plan Implementation. The following text has been revised to reflect changes as recommended by the Planning Commission at their public hearings on August 1, 2024, and September 19, 2024.

Land Use Element Implementation Actions

Implementation Action		Applicable Policy	Responsible Department	Time Frame
IM-LU-14	**Redondo Beach objective design standards and applicant guidelines.** Update the residential design guidelines that direct architectural design, building siting and orientation, neighborhood identity including monumentation, wayfinding, placemaking elements, and other public realm features for mixed-use areas, transit-oriented higher intensity areas, and residential overlays.	LU-2.2, LU-2.3, LU-2.5, LU-2.6, LU-2.8, LU-3.2, LU-3.3, LU-3.5, LU-6.14	Community Development	Short, ongoing. The Objective Design Standards will be reviewed every three years.
IM-LU-34	**Public noticing and education**. Review and evaluate existing public noticing requirements for development projects to ensure adequate public awareness. Develop a public education and outreach plan for land use related issues which can be iterated and utilized throughout the year.	LU-3.11	Community Development	Short term
IM-LU-37	**Health in corridors.** Require a Health Risk Assessment to identify best practices to minimize air quality and noise impacts when considering new residential uses within 500 feet of a freeway. Continue to use appropriate risk assessment standards.	LU-4.2	Community Development	Short term

3. Revisions to the Draft EIR

Land Use Element Implementation Actions

	Implementation Action	Applicable Policy	Responsible Department	Time Frame
IM-LU-39a	**Harbor amenities plan.** Implement the Harbor Amenities Plan. The Harbor Amenities Plan serves to promote and enhance the City's coastal amenities and provide improved coastal access and coastal recreational opportunities.	LU-4.3	Community Development and Waterfront Economic Development	Short, Midterm
IM-LU-42	**CAP.** Continue to implement the strategies identified in the City of Redondo Beach Climate Action Plan (CAP). Update the City's existing Climate Action Plan.	LU-5.2, LU-5.5, LU-5.6	Community Development, Public Works	Short, ongoing
IM-LU-44	**Landscaping**. Evaluate the potential of establishing landscape design criteria/guidelines that require the exclusive use of native California ~~and~~ drought resistant vegetation in all housing and commercial developments.	LU-5.2, LU-5.5	Community Development	Short term
IM-LU-45	**Urban Forest.** Continue to investigate the development of an urban forest ordinance to provide for the consistent use of street trees to identify City streets, neighborhoods, commercial districts, and community gateways, consistent with the City's list of approved tree species. Conduct a survey of public streets, and identify areas where street trees do not exist, but could be supported. Partner with community groups and seek funding to expand the urban forest in these areas, with priority given to areas identified as park-deficient in the Parks Master Plan or Open Space and Conservation Element. Conduct an accurate count of tree acreage (percentage of the city's total area) and establish a tree coverage target percentage of 29%.	LU-5.8, LU-5.9	Public Works, Community Development	Midterm

Land Use Element Implementation Actions

Implementation Action		Applicable Policy	Responsible Department	Time Frame
IM-LU-46a	**Heat island mitigation.** Develop a "heat island" mitigation plan that includes guidelines for cool roofs, cool pavements, and strategically placed shade trees. Require all new development and major rehabilitation (i.e., additions of 25,000 square feet of office/retail commercial or 50,000 square feet of industrial floor area) projects to incorporate any combination of the following strategies to reduce heat gain for 50 percent of the non-roof, impervious-site landscape, which includes roads, sidewalks, courtyards, parking lots, and driveways: shaded within five years of occupancy; paving materials with a Solar Reflectance Index (SRI) of at least 29; open grid pavement system; and parking spaces underground, under deck, under roof, or under a building. Any roof used to shade or cover parking must have an SRI of at least 29.	LU-5.6	Community Development and Public Works	Midterm
IM-LU-46b	**Green infrastructure plan.** Update Municipal Code to include regulations for green roofs, vertical meadows, retention wells/ponds, rain gardens, curb cuts for bioswales, and permeable surfaces.	LU-5.10	Community Development and Public Works	Midterm
IM-LU-46c	**Environmental sustainability civic engagement plan.** Development an education and public outreach environmental sustainability plan in partnership with local environmental non-profit organizations.	LU-5.11	Community Development and Public Works	Midterm

3. Revisions to the Draft EIR

Land Use Element Implementation Actions

Implementation Action		Applicable Policy	Responsible Department	Time Frame
IM-LU-60	**Historic properties**. Update, expand, and periodically update the Citywide Historic Properties Survey to identify potential historic resources for placement on local Register and those that are at risk of losing their historic value. Include details documenting architecturally significant features that could be salvaged and reused. Consider including historically significant public landscape features, including specimen trees be designated as landmarks and preserved.	LU-2.1, LU-7.1, LU-7.3, LU-7.4, LU-7.9	Community Development	Short term
IM-LU-66	**Historic preservation ordinance**. Update and periodically review the historic preservation ordinance to incorporate findings of the updated Historic Resources Survey. Develop the City processes and ordinances to objectively designate historic buildings, resources, landmarks, and historic districts. Develop the City processes and ordinances required to protect and preserve historic buildings, resources, landmarks, and historic districts that have been designated as historic.	LU-7.9	Community Development	Short term

Land Use Element Implementation Actions

	Implementation Action	Applicable Policy	Responsible Department	Time Frame
IM-LU-67	**Special Policy Areas.** Identify and prioritize which special policy areas would most benefit from an area plan, specific plan, or corridor plan. As resources permit, develop and implement identified plans in order of priority. Resulting plans may include, but are not limited to the following, as appropriate for each area: • Strategies to promote desired reinvestment and redevelopment; • Regulations, and design standards with consideration of the character, history and uniqueness of existing corridors and neighborhoods. (Including standards that minimize impact of higher intensity development near established neighborhoods, and minimize viewshed impacts of new development on established neighborhoods) • A public realm plan to achieve a unified vision for long-term improvements to streets, sidewalks, plazas, other public spaces, and placemaking elements including landscaping palettes that uniquely identify unique commercial districts and residential neighborhoods in the City. • Public improvement priorities and pilot projects for inclusion in the City's Capital Improvement Program.	SPA-1, SPA-4, SPA-5, SPA-6, SPA-7	Community Development	Short, Midterm

3. Revisions to the Draft EIR

Land Use Element Implementation Actions

Implementation Action	Applicable Policy	Responsible Department	Time Frame
• Strategies to integrate improvements that facilitate transit use. <u>Identify Special Policy Areas PCH North (SPA-5A), PCH Central (SPA-5B), and Torrance Blvd. (SPA-5C) as a priority and establish new parking ratio and increased FAR standards as a short-term action item.</u>			

Figure 3-5, *Proposed Land Use Plan*, page 3-21, *Project Description,* and Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to a letter submitted to the City by the Redondo Beach Unified School District (RBUSD) on the General Plan Update (dated July 17, 2024), to change the proposed land use designation of Open Space (OS) to Public Institutional (PI) at the Lincoln Elementary School Fields and Blacktop Area, the Alta Vista Elementary School Fields, and the former Franklin School Site.

Figure 3-5, *Proposed Land Use Plan*, page 3-21, *Project Description*, and Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to Planning Commission's and planning staff's recommendations to change the proposed land use designation of the AES powerplant site and the SCE ROW site from Public Utility (PU) to Public or Institutional (P).

Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to Planning Commission's and planning staff's recommendations to raise the proposed minimum non-residential FAR from 0.35 to 0.40 the proposed C-4 land use designation to C-2 for sites fronting Pacific Coast Highway (PCH). C-4 land use designation has the same uses as C-2 land uses and therefore would not affect the analysis of the DPEIR.

Figure 3-5, *Proposed Land Use Plan*, page 3-21, *Project Description*, and Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to Planning Commission's and planning staff's recommendations, revisions to revert all Utility (U) designation to Public (P). The proposed Public/Utility (U) land use designation provides for utility uses including easements with public access for recreation and parking is similar in use and intensity to the Public (P) designation. Maximum FAR 0.10. Therefore, this revision would have no material effect on the FPEIR. .

Appendix A Attachments to Comment Letter A3

Appendices

This page intentionally left blank.

Notable Historical Tsunamis in Los Angeles County

Run-up amplitude, in feet, above normal tide conditions

OBS = observed tsunami activity
NR = No damage or severe conditions reported

- Distant Source - Tsunamis without felt earthquakes

- Local Source - Earthquake and tsunami together

Date	Magnitude-Source area	Tsunami location	Run-Up/Amp	Remarks
7/10/1855	multiple local Eqs	Santa Monica	?	"...considerable commotion in the water, attended by a strong rushing sound..."
8/13/1868	M8.5 - Chile	LA/San Pedro	2 ft	"...the loading dock was submerged..."
5/10/1877	M8.3 - Chile	LA/San Pedro	6 ft	"...The current was frightfully swift to look at..."
8/10/1879	moderate local EQ	Santa Monica	?	Minor "tidal wave" followed EQ
4/13/1923	M7.2 - Kamchatka	LA/San Pedro	?	"...ships had difficulty holding their lines due to swirling tides..."
8/30/1930	meteotsunami?	Santa Monica	10 ft	One person killed due to high surf; conjecture on tsunami source; possible LS from local M5.2 EQ
4/1/1946	M8.8 – Aleutian Islands	LA/San Pedro	3 ft	Broke ships from moorings
		Long Beach	1 ft	NR
		Catalina	6 ft	Damage to docks
11/4/1952	M9.0 - Kamchatka	Santa Monica	2 ft	NR
		LA/San Pedro	1 ft	Docking ferry problematic
		Long Beach	1 ft	NR
3/9/1957	M8.6 - Aleutian Islands	Santa Monica	2 ft	NR
		LA/San Pedro	1 ft	NR
		Long Beach	1 ft	NR
5/22/1960	M9.5 - Chile	Santa Monica	5 ft	NR
		LA/San Pedro	3 ft	One death (swimmer); $1M in damages; 800 small craft unmoored, 200 damaged, 40 sunk
		Long Beach	3 ft	Dock damage
		Alamitos Bay	2 ft	NR
		Catalina	2 ft	NR
3/28/1964	M9.2 – Alaska	Santa Monica	3 ft	One boat sunk; $100k damage at Marina Del Rey
		LA/San Pedro	2 ft	One death to longshoreman by falling object; $250k in damages; 100 boats unmoored, 6 sunk
		Long Beach	?	$100k in damages
		Alamitos Bay	2 ft	NR
		Catalina	2 ft	NR
11/29/1975	M7.1 - Hawaii	Catalina	4 ft	Damage to dock and boats
9/29/2009	M8.0 – Samoa	LA/San Pedro	1 ft	NR
2/27/2010	M8.8 – Chile	Santa Monica	2 ft	Minor damage in Marina Del Rey
		LA/San Pedro	1 ft	Minor damage to docks and boats
		Long Beach	?	NR
		Catalina	3 ft	Minor damage to several docks
3/11/2011	M9.0 - Japan	Santa Monica	3 ft	Minor damage in Marina Del Rey
		Redondo B.	2 ft	One dock, five boats damaged; $15K in damage
		LA/San Pedro	2 ft	Minor damage to boats and docks
		Long Beach	?	Damage to dock and boats
		Catalina	?	Damage to several docks and boats

CGS CALIFORNIA GEOLOGICAL SURVEY
Cal OES GOVERNOR'S OFFICE OF EMERGENCY SERVICES
USC UNIVERSITY OF SOUTHERN CALIFORNIA
NOAA
FEMA
THE NATIONAL TSUNAMI HAZARD MITIGATION PROGRAM (U.S.)

Tsunami Source Scenario Model Results for Los Angeles County

2019 UPDATE - Near shore tsunami heights (flow depths) for both local and distant source scenarios, in FEET above Mean Sea Level.
NOTE: The projections do not include any adjustments for ambient conditions, such as storm surge and tidal fluctuations, and model error (it is very important to note this difference, as those numbers can increase the projected water height during an event).

	TSUNAMI SOURCES	Approximate Travel Time	Leo Corrillo State Beach	Malibu Beach/ Lagoon	Santa Monica Pier	Marina Del Rey	Manhattan Beach	Redondo Beach	Palos Verdes Hills	San Pedro-POLA	Long Beach Middle Harbor-POLB	Long Beach	Naples-Alamitos Bay	Catalina-Avalon	Catalina-Two Harbors
Local Sources	M7 Newport-Inglewood Fault	10-15min								2	3	3	3		
	M7.5 Channel Isl. Thrust Fault	10-15min	4		3	2	3	3	3						
	M7.2 Anacapa Dume Thrust Fault	10-15min		8	6	3	6	6	5						
	Palos Verdes Landslide 1	10-15min			7	4	6	10	20	4	4	4	5		
	Palos Verdes Landslide 2	10-15min								6	5	5	5	12	16
	M7.1 Santa Monica Thrust Fault	10-15min		4	5	3	3	4	3						
	M7.7 Catalina Fault	15-20min	4	6	6	5	6	6	6	5	7	7	7	27	10
Distant Sources	M9 Cascadia-full rupture	2hr			4	4	4	4	3	3	4	4	4	3	3
	M9.2 Alaska 1964 EQ	6hr	5	5	7	6	5	4	4	8	7	9	8	4	4
	M9.3 Alaska-East Aleutians	6hr	7	8	14	14	9	8	7	9	8	12	13	-	-
	M8.9 Central Aleutians I	6hr	3		5	5	4	4	4	4	5	5	4		
	M8.9 Central Aleutians II	6hr			3	4	3	4	3	3	3	4	4		
	M9.2 Central Aleutians III	6hr	6	7	10	10	7	6	5	13	10	11	13	5	5
	M9 Kamchatka 1952 EQ	9hr	3												
	M8.8 Kuril Islands II	10hr			3	2	3	2	2	2	3	3	3		
	M8.8 Kuril Islands III	10hr			3	3	3	3	2	2	3	3	3		
	M8.8 Kuril Islands IV	10hr			3	3	3	3	2	2	3	3	3		
	M8.8 Japan II	11hr			3	3	3	3	2	2	3	3	3		
	M9.5 Chile 1960 EQ	13hr			5	5	4	4	4	4	7	9	10	3	3
	M9.4 Chile North	13hr	5	5	5	6	5	5	5	4	10	9	11	4	5
	Maximum Runup - Local Source		**4**	**9**	**8**	**5**	**7**	**11**	**24**	**7**	**8**	**8**	**8**	**30**	**18**
	Maximum Runup - Distant Source		**7**	**9**	**11**	**11**	**8**	**7**	**5**	**15**	**12**	**13**	**15**	**7**	**7**
	UPDATED Maximum Runup - Distant Source		**8**	**9**	**15**	**15**	**10**	**9**	**9**	**10**	**10**	**14**	**15**	-	-

CGS California Geological Survey · Cal OES Governor's Office of Emergency Services · USC University of Southern California · NOAA · FEMA · The National Tsunami Hazard Mitigation Program (U.S.)

2019 Updated Source Information

Appendix B Attachments to Comment Letter A4

Appendices

This page intentionally left blank.

Attachment 1

Seismic Risk Consulting Report

by ImageCat, Inc.



Beach Cities Health Center

514 North Prospect Avenue
Redondo Beach, CA 90277

Prepared For:

Beach Cities Health District
514 North Prospect Avenue
Redondo Beach, CA 90277

October 21, 2021

ImageCat, Inc.

ImageCat, Inc.
400 Oceangate Ste. 1050
Long Beach, CA 90802
Phone: (562) 628-1675

October 21, 2021

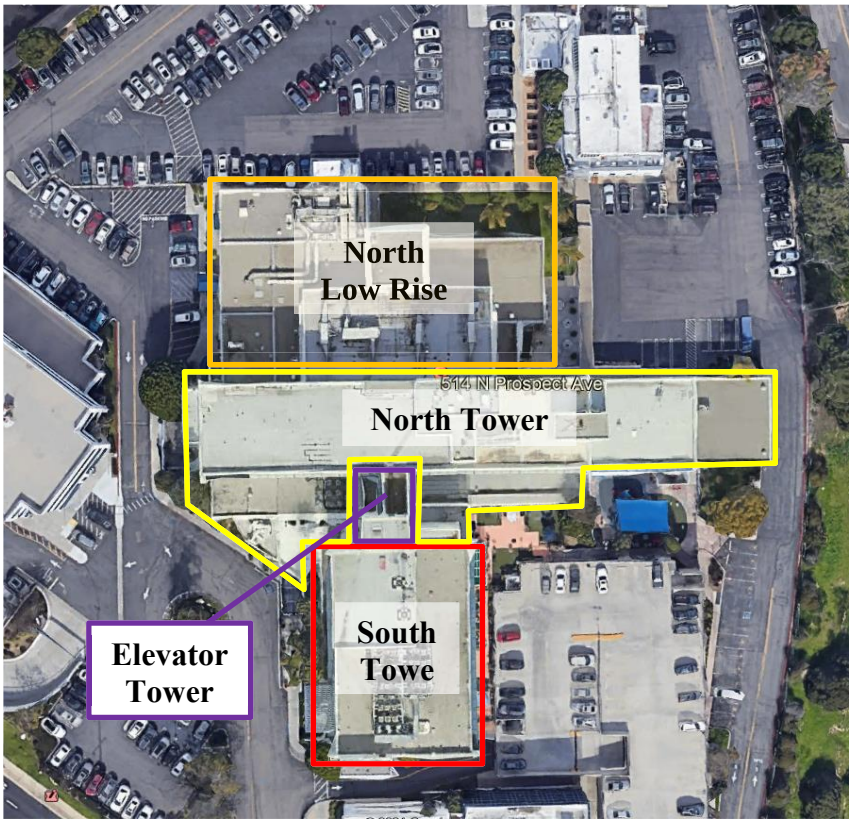
Beach Cities Health District
514 North Prospect Avenue
Redondo Beach, CA 90277

Attention: Tom Bakaly, Chief Executive Officer

Report: **Seismic Risk Consulting – Beach Cities Health Center**
514 North Prospect Avenue, Redondo Beach, CA 90277

Dear Mr. Bakaly,

ImageCat, Inc. (ImageCat) is pleased to present this report to Beach Cities Health District (BCHD) for seismic risk consulting regarding the Beach Cities Health Center towers, located at 514 North Prospect Avenue, in Redondo Beach, California (ZIP 90277). The property consists of a 4-story medical office building with 1 subterranean level. It is of reinforced concrete construction, composed of the North Tower (built in 1957 with a low-rise extension to north), the South Tower (built in 1967), and the Elevator Tower (built in 1967). The North Tower, the South Tower and the Elevator Tower are all separated by seismic joints. The low-rise extension of the North Tower is not part of the scope for this study. We understand that this study is needed to inform your decision-making process related to redevelopment/retrofit plans to achieve seismic safety while continuing to provide services to the community.



Site View

Purpose of the Study

BCHD has asked ImageCat, working together with Nabih Youssef Associates, to consider a number of different alternatives for the future of the buildings: 1) maintain status quo (i.e., no action to be taken or NO PROJECT to be planned or executed), 2) demolish today, 3) demolish in 3-5 years, with completion of the construction for a replacement facility, and 4) seismic retrofit of the existing buildings. This report addresses all four alternatives. For alternative 1, we present the estimated probabilistic risks associated with the structures in their status quo condition, examined for various durations of future usage. For the other three alternatives, ImageCat has qualitatively described the likely outcomes and various implications to BCHD, its customers, and other stakeholders. For each of the itemized implications, BCHD may refer to results of previous analyses conducted by financial consultants for quantitative information on costs and/or benefits.

Scope of Study

In this study, ImageCat reviewed the earthquake hazards for the subject site (ground shaking, liquefaction, and surface fault rupture) using published geological maps and a recent geotechnical investigation report [Converse Consultants, 2016].

We reviewed various available Architectural and Structural design drawings (original and expansion sets), and the Seismic Evaluation report [Nabih Youssef Associates (NYA), 2018]. We conducted multiple discussions with Engineers from NYA to obtain a detailed understanding of their findings on the structures' characteristics and current conditions and shared our observations. A Structural Engineer from ImageCat conducted a visual survey at site to assess existing configuration, conditions, and usage of the structures.

To examine seismic risks for the structures in their status quo conditions, ImageCat performed risk analysis using SeismiCat, ImageCat' earthquake risk tool for individual sites. Results include tables and curves relating the severity of the estimated probabilistic risks for various durations of future usage (short- and long-term) along with corresponding information on building stability, and downtime.

ImageCat also qualitatively described the outcomes and implications of the other considered alternatives according to our understanding, conversations with BCHD, and review of preliminary financial feasibility studies conducted by other consultants (Cain Brothers, CBRE, 2020).

Reliance

This report may be used and relied upon by Beach Cities Health District (BCHD) and each of its respective successors and assigns.

Organization of This report

This report summarizes the results of ImageCat's seismic risk review and is organized as follows:

1. Site Seismic Hazards
2. Building Vulnerability
3. Seismic Risk Results
4. Limitations

Appendices

1. Site Seismic Hazards

The earthquake hazards we considered include strong ground shaking, soil liquefaction, surface fault rupture and slope instability. Findings are drawn from published maps, a recent site geotechnical investigation report [Converse Consultants, 2016] and the ground shaking models of the U.S. Geological Survey (USGS).

1.1 Seismic Setting

California is the most seismically active of the United States. The San Andreas Fault strikes north-northwest from the Mexican border, past Los Angeles, and San Francisco, until it veers offshore near Eureka. The San Andreas forms the active boundary between two tectonic plates in relative motion. To the west of the San Andreas Fault extends the Pacific Plate, while to the east lies the North American Plate. Along most of the fault, the boundary is held locked by tremendous forces as the plates build up strain energy. Eventually, the constraining forces are overcome along stretches of this boundary, allowing sudden relative motion between the two sides of the fault. The strain energy stored in the rock is violently released as seismic waves, radiating outward from the rupturing fault segment. At the ground surface, hazards that accompany large earthquakes may include strong ground shaking and surface fault rupture, liquefaction, and landslide.

Within the Los Angeles basin, a set of faults including the Malibu Coast, Hollywood, Santa Monica, Sierra Madre and Cucamonga faults, forms the boundary between two physiographic provinces. To the north of the boundary is the Transverse Ranges Province, where seismic activity dominated by reverse and thrust faulting, giving rise to the Santa Monica and San Gabriel mountains. To the south is the Peninsular Ranges Province which features strike-slip faulting such as the Newport-Inglewood and the Elsinore fault systems, and blind thrust faults, such as the San Joaquin Hills Thrust and the Puente Hills Thrust. The site is found south of the boundary, within the Peninsular Ranges. All of these local faults give rise to frequent earthquakes, with attendant strong ground shaking, soil liquefaction, surface fault rupture, landslide and other hazards.

Of particular interest to BCHD are the Palos Verdes Fault and the Newport-Inglewood Fault. These are the closest and most active faults that can strongly affect the building. The Newport-Inglewood Fault displays strike-slip motion and produced the 1933 Long Beach Earthquake (M6.3). It can produce an earthquake of M7.1 if its onshore segments rupture together. It is thought to link with offshore segments that continue south to the Rose Canyon Fault and are capable of producing a large event if they rupture together. The Palos Verdes Fault has been active in late Quaternary time and is capable of a M7.3 earthquake. Further details and technical fault descriptions from the USGS for the four closest faults are included in Appendix B.

1.2 Local Faulting

The closest significant regional faults and their distances to the project site are tabulated below. Figure 1 shows the site location with respect to regional faults. These known faults all contribute to the ground shaking hazard and associated hazards at the site. Other, hidden faults also contribute to the hazard, and all of these faults are comprehensively considered in the USGS model.

Distance from Site to Regional Faults

Fault Name	Type	Limiting Magnitude	Distance (mi.)
Compton	RV	7.4	1.8
Palos Verdes	SS	7.3	2.4
Redondo Canyon	SS	6.2	3.0
Newport-Inglewood	SS	7.1	6.5
San Pedro Escarpment	RV	7.1	9.5
Puente Hills	RV	6.8	11.7
Santa Monica	SS	6.7	13.2
Elysian Park	RV	6.8	13.7
San Pedro Basin	SS	7.0	14.6
San Vicente	SS	6.2	14.6
Malibu Coast	SS	6.6	14.7
Anacapa-Dume	SS	7.1	15.2
Hollywood	SS	6.6	15.7
North Salt Lake	RV	6.0	16.0
Anaheim	SS	6.2	18.1
Raymond	SS	6.6	20.6

SS = Strike-slip; RV = Reverse

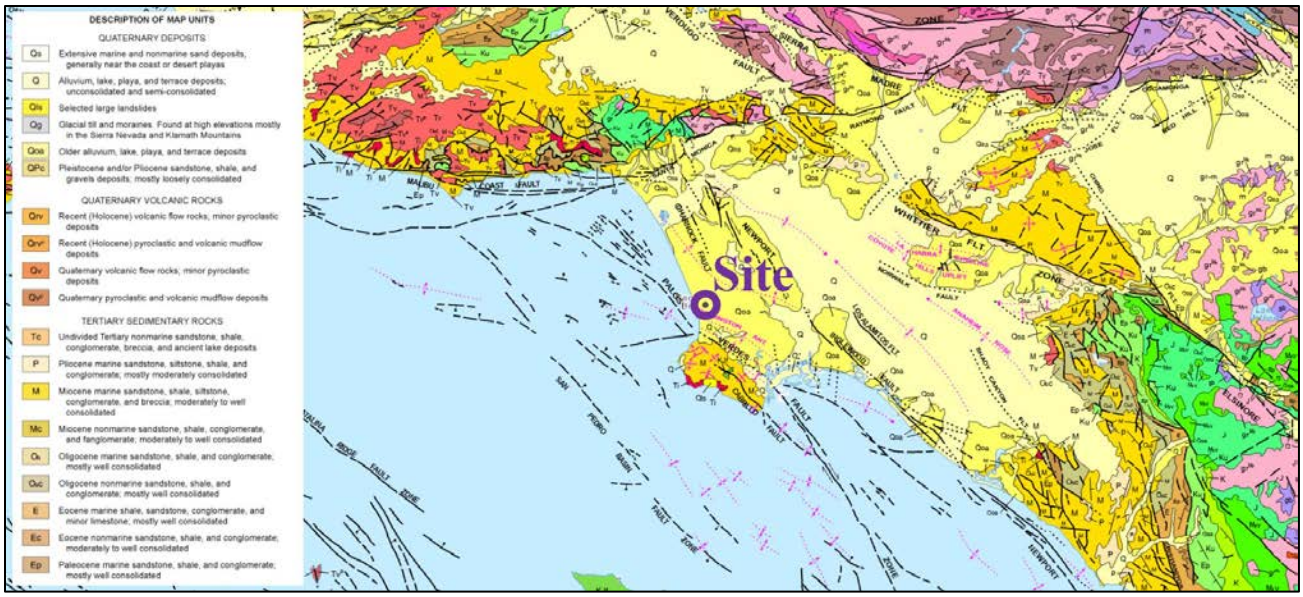


Figure 1 – Site Location, Geology and Local Faulting [CGS]

1.3 Surface Fault Rupture

Surface fault rupture can cause vertical and horizontal offsets that damage underground utilities and structural foundations that cross the fault. The State of California maintains maps of active faults known to rupture the ground surface [California Geologic Survey, SP-42] for the purpose of preventing structures from being built across the potential surface fault rupture. No known surface-rupturing faults cross the site [Redondo Beach quadrangle, CGS, 1999]. Based on this brief screening review of local faulting, we do not expect local surface fault rupture to contribute to the seismic risks at the site during the useful life of the buildings. BCHD's Geotechical Engineer, Converse Consultants, came to the same conclusion.

1.4 Landslide

Historically, landslides triggered by earthquakes have been a significant cause of earthquake damage. Areas that are most susceptible to earthquake-induced landslides are steep slopes in poorly cemented or highly fractured rocks; areas underlain by loose, weak colluvial soils; and areas near or within previous landslide deposits. The relatively flat site is NOT found within a Zone of Required Investigation for Landslide as defined by the State of California [Redondo Beach quadrangle, CGS, 1999]. We do not expect the site to be subject to earthquake-induced slope instability. BCHD's Geotechical consultant, Converse Consultants, also concluded that the site should not experience earthquake-induced slope instability.

1.5 Liquefaction

Earthquake-induced liquefaction is a ground failure phenomenon in which loose, sandy soils below the water table lose shear strength when subjected to many cycles of strong ground shaking. The effects of liquefaction may include settlement, lurching and lateral spreading. Where liquefaction occurs beneath building foundations, large settlements or dislocations can cause high levels of structural damage.

The site is NOT found within a Zone of Required Investigation for Liquefaction as defined by the State of California [Redondo Beach quadrangle, CGS, 1999]. According to the recent Geotechnical investigation report [Converse Consultants, 2016], the site soils consist of a fill layer underlain by alluvial soils extending to the maximum explored depth of 61.5 feet Below Ground Surface (BGS). The fill layer consist of silty sand and clayey sand to depths ranging between 3 to 13 feet BGS. The alluvial sediments consist of older dune and drift sand. Groundwater was not encountered during site explorations. Considering the relatively dense site soils and the absence of a shallow groundwater table, the Geotechnical Engineer concluded that potential for liquefaction risk at site is low.

1.6 IBC Classification of Soils

Site ground conditions affect the intensity and duration of ground shaking, as well as the shape of the ground motion response spectrum. In comparison to rock sites, soft soils amplify moderate ground motions, extending the duration of ground shaking, and shifting seismic energy to longer periods.

Based on the soil characteristics describe above and the site geotechnical report [Converse Consultants, 2016], ground conditions correspond to Site Class D as described in the International Building Code (IBC) and ASCE-7. The earthquake motions used in this study were computed directly for this condition.

1.7 Strong Ground Shaking

1.7.1 Previous Ground Shaking

The Redondo Beach site has not been subject to high levels of ground shaking since the construction of the buildings in question (1957-1967). Prior to the construction of the towers, the site was strongly shaken in the 1933 Long Beach Earthquake (M6.4). Maps of the earthquake show shaking in the general area may have corresponded to Modified Mercalli Intensity (MMI) of VIII. See Appendix C – Earthquake Risk Glossary for a description of the Modified Mercalli Intensity scale, used prior to the deployment of widespread strong motion instrumentation. Other earthquakes occurring over the life of the existing structures include 1971 Sylmar (M6.6), 1987 Whittier-Narrows (M6), 1992 Landers (M7.3) and Big Bear (M6.8), and the 1994 Northridge (M6.7) event. Ground shaking intensities in these events were generally slight or slight to moderate, and we know of no reported damage from any of these past events.

1.7.2 Future Ground Shaking

Using the comprehensive probabilistic seismic hazard model from the U.S. Geological Survey [Petersen, Frankel, et al, 2014; Schumway et al., 2018], ImageCat has estimated the site ground shaking hazards. This model includes all of the major known surface faults. It also accounts for the scattered seismicity that is not associated with these major faults.

As an example of the level of seismicity and ground shaking at this site, we have estimated the levels of motion that have a 10% chance of being exceeded within the 50-year exposure. This level of ground shaking may be viewed as having an average return period of 475 years. The peak ground acceleration **(PGA) is 0.47g**, the short-period spectral acceleration **(Ss) is 1.09g**, and the 1-second spectral acceleration **(S1) is 0.66g**. In our risk estimates in Section 3, we make use of probabilistic hazards for this site at a wide range of annual probabilities (or equivalently, for a wide range of return periods).

1.8 Other Seismic Hazards

The existing site grade is at elevations more than 150 feet above mean sea level. The site is not within a tsunami inundation zone [CGS] and we conclude that it should not be affected by tsunami hazards. Other seismic hazards such as fire and blast do not appear to affect this site.

1.9 Discussion of Hazards

The seismic hazards for the site at 514 North Prospect Avenue, in Redondo Beach are dominated by frequent strong ground shaking. Other hazards such as earthquake-induced landslide, soil liquefaction or surface fault rupture do not appear to be significant at this site. The ground shaking hazard is stronger than assumed in the original design codes (i.e., the 1955 and 1964 editions of the Uniform Building Code), and the buildings' design predates the Importance Factor (I-factor) in the code, which increased the ground motions and resulting design forces for essential facilities like hospitals. New design and construction at the site to current codes can easily account for the seismic hazards at the site to provide a higher level of earthquake resistance and more resilent performance.

2. Building Vulnerability

All three structures (i.e., the North Tower, the South Tower, and the Elevator Tower) are of reinforced concrete construction. They all have complete gravity and lateral load resisting systems. The gravity loads are carried by reinforced concrete floors (concrete slab and pan joist system) that rest on concrete girders, columns, load-bearing walls, and columns that carry the loads down to the reinforced concrete foundations.

Lateral loads in buildings are caused by earthquakes or winds. In California, lateral loads from earthquakes often govern the design for this type of buildings. Reinforced concrete floor slabs act as rigid diaphragms and collect lateral loads in each floor. These loads are then distributed to the vertical lateral load resisting elements such as reinforced concrete shear walls and reinforced concrete moment resisting frames. These elements carry the loads down to reinforced concrete foundations. The North Tower has shear walls in both the north-south and east-west directions. It also has additional moment resisting frames in the east-west direction. The south tower has shear walls in the east-west direction, and moment resisting frames in the north-south direction. The elevator tower has a core system with shear walls around its perimeter.

All three of these buildings were designed and constructed before 1970. During the past 50 years, many substantial changes have occurred in analysis and design codes and procedures for reinforced concrete structures, including increases in seismic hazard levels and the resulting design forces. Most of these changes were the results of lessons learned from past earthquakes. The 1971 San Fernando Earthquake (M6.7) exposed major strength and ductility deficiencies in concrete structures designed under then-current provisions of the Uniform Building Code (UBC). Good earthquake performance requires both “strength” and “ductility.” Strength is needed to keep the structure undamaged under low-to-moderate earthquake motions. Ductility (“toughness”) requires reinforcement detailing to confine the concrete and withstand overloads and large deformations while maintaining strength and stability. These observations of failures in led to major revisions in requirements for design of new concrete buildings.

For existing buildings (similar to the subject buildings), national standards like ASCE 41-17 “Seismic Evaluation and Retrofit of Existing Buildings” provide appropriate methods to identify the existence and severity of various seismic deficiencies that can affect building’s performance in future events in terms of damage and stability. The standard also provides guidance on the retrofit methods. The seismic evaluation study by NYA (dated 2018) followed this standard to identify deficiencies that can lead to stability issues affecting life-safety, as well as affecting structural and nonstructural damage, with implications for repair costs and downtime. ImageCat’s review of NYA’s report and discussions with NYA have improved our understanding of these buildings.

We note that several cities in California (e.g., Los Angeles, San Francisco, Santa Monica, etc.) are now citing older, nonductile (or “brittle”) reinforced concrete buildings under ordinances requiring evaluation of known typical deficiencies followed by seismic retrofit design and construction (or demolition) where these deficiencies are confirmed. At present, the City of Redondo Beach does not have such an ordinance in force, but it is possible in the future that the City will enact one. Any plans to continue use of these buildings over the long term should consider this possibility.

The sections below present findings from our review of original Structural drawings, visual site survey, and discussions with Structural Engineers from NYA in more detail and in technical terms.

2.1 Building Seismic Vulnerability

2.1.1 North Tower

Basis:	Original Architectural and Structural design drawings (dated 1957); Site geotechnical investigation report [Converse Consultants, 2016]; Seismic Evaluation Report [NYA, 2018]; Visual site survey by R. Imani PhD, PE, SE of ImageCat on 8/11/2021.
Architect:	Walker, Kalionzes, Klingernan Architects, Los Angeles, CA.
Structural Engineer:	Henry M. Layne, S.E.
Geotechnical Engineer:	The original Geotechnical Engineer is not identified on the drawings.
Year Built:	1957
Design Code:	The 1955 Edition of the Uniform Building Code (UBC)
Height:	4-story with a roof-top mechanical penthouse and 1 basement level.
Materials:	Concrete has 28-day compressive strength (f'c) of 2,000 psi for slab-on-grade, and 2,500 psi for all other elements. Reinforcing steel conforms to ASTM A305, intermediate grade. All steel pipe columns are ASTM A53, Grade B.
Foundations:	Reinforced concrete spread footings, continuous strip footings and a 4" thick slab-on-grade. Maximum allowable soil bearing pressure is 5,000 psf.
Gravity System:	One way reinforced concrete slab spans over reinforced concrete pan joists resting on reinforced concrete girders that are supported by reinforced concrete columns or load-bearing walls. These elements transfer the loads down to reinforced concrete foundations.
Lateral System:	Reinforced concrete floor slabs act as rigid diaphragms, collecting and redistributing lateral forces to reinforced concrete shear walls acting in both directions of the building. Deep reinforced concrete spandrel beams frame into concrete columns to form moment-resisting frames on the exterior lines in the east-west direction. These elements transfer the loads down to reinforced concrete foundations.
Remarks:	Reinforced concrete shear walls are 6" to 12" thick with 2 layers of vertical and horizontal reinforcement (except for the 6" thick walls). Distributed horizontal and vertical reinforcing typically consists of #4 bars spaced at 11 to 17 inches on center. Spandrel beams have #5, #6 or #9 continuous bars at top and bottom, and #3 or #4 stirrups spaced at 16 or 17 inches on center. Reinforced concrete columns have square, rectangular, or circular sections, with #6, #7 or #8 vertical bars and #2 ties spaced at 8 or 12 inches on center, or 3/8" diameter spirals with a 1-3/4" pitch. Transverse reinforcing for both spandrels and columns are significantly less than the ductility and

shear strength requirements of the current codes, making them vulnerable to brittle shear failure.

The roof-top mechanical penthouse has reinforced concrete shear walls around its perimeter.

A seismic gap of 4" exists between the North Tower and the low-rise (1- and 2-story) expansion building to the north.

The building has vertical irregularity deficiency in parts of the lateral load resisting system where discontinuous shear walls are supported by beams or columns of lower floors (e.g., penthouse shear walls supported by roof beams and two columns along the north side of the building supporting another discontinuous shear wall). This condition may lead to overstress with increased seismic damage or collapse in the supporting members.

Condition: Fair to good.

Architectural Notes: Exterior walls have painted concrete surfaces. The building has a built-up roof system.

Equipment Notes: Various types of equipment were observed to be well-anchored (HVAC units on roof, supply fans in roof-top penthouse, water heaters, elevator machinery, etc.

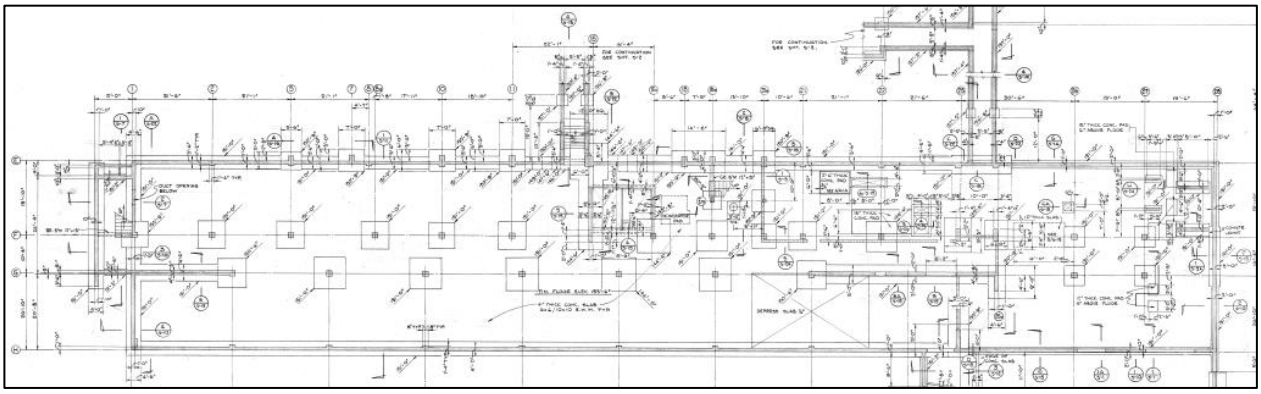


Figure 2 – Foundation and Basement Plan (North Tower)

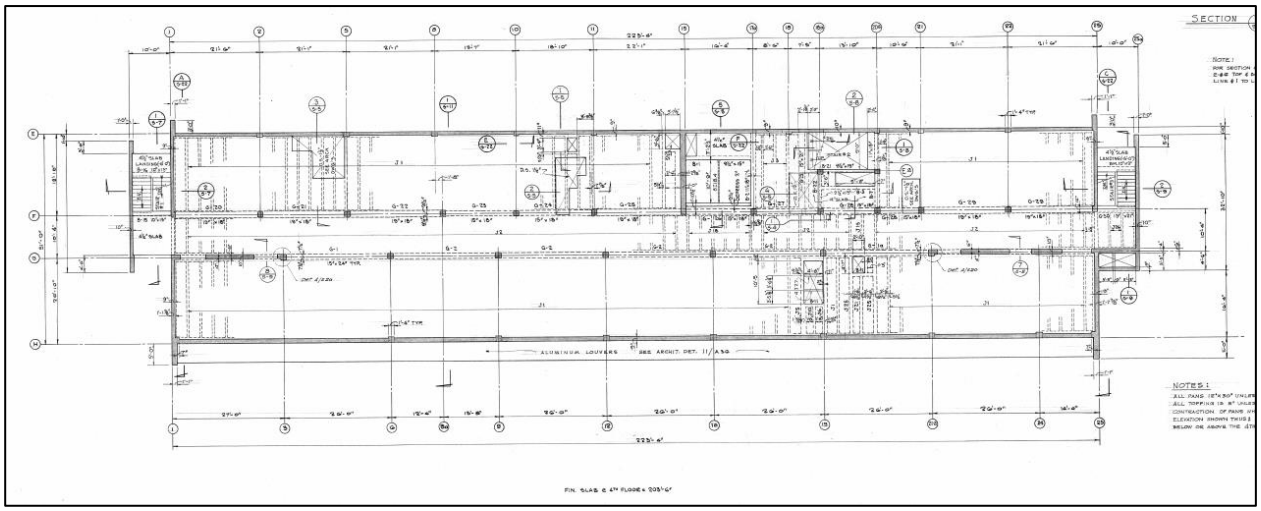


Figure 3 – 4th Floor Framing Plan (North Tower)

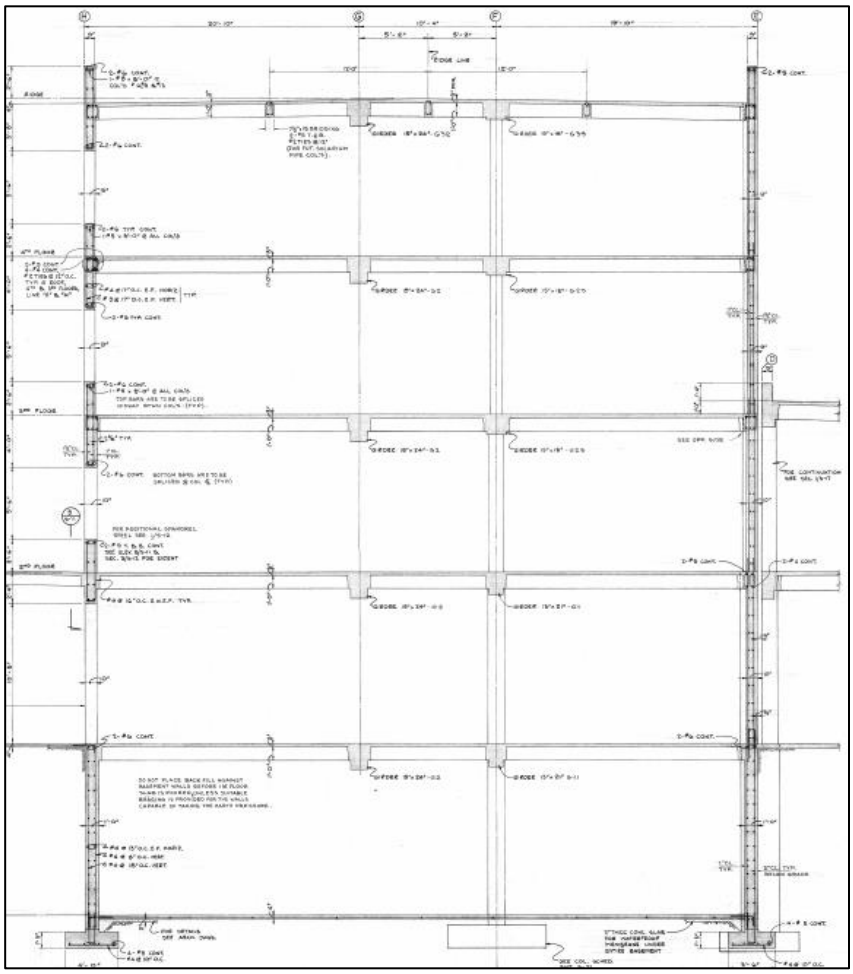


Figure 4 – Building Section (North Tower)

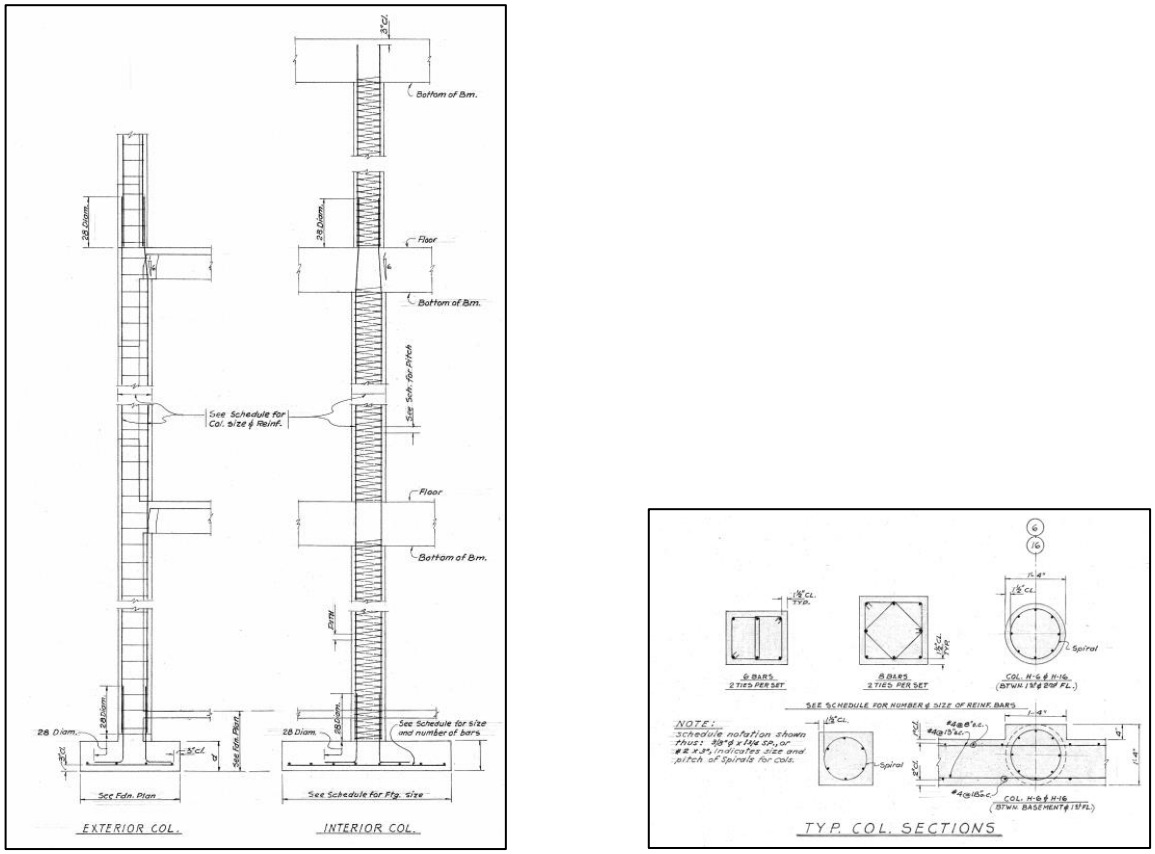


Figure 5 – Column Elevation and Details (North Tower)

2.1.2 South Tower and Elevator Tower

Basis:	Original Architectural and Structural design drawings (dated 1967); Site geotechnical investigation report [Converse Consultants, 2016]; Seismic Evaluation Report [NYA, 2018]; Visual site survey by R. Imani PhD, PE, SE of ImageCat on 8/11/2021.
Architect:	Kalionzes, Klingernan Architects, Los Angeles, CA.
Structural Engineer:	Henry M. Layne, S.E.
Geotechnical Engineer:	The original Geotechnical Engineer is unknown, but the Architectural drawings reproduce soil borings for the site.
Year Built:	1967
Design Code:	The 1964 Edition of the Uniform Building Code (UBC) assumed based on the year of construction. The Manual of Standard Practice for Reinforced Concrete Construction, Western Concrete Reinforcing Steel Institute is cited for concrete construction. The AISC Code (1963) is cited for steel construction.

Height:	4-story with a roof-top mechanical penthouse and 1 basement level.
Materials:	Concrete has 28-day compressive strength (f'c) of 2,500 psi for slab-on-grade and foundations, and 3,000 psi for all other elements. Reinforcing steel conforms to intermediate grade bar, with deformations per ASTM A305. Structural steel conforms to ASTM A53, Grade B for pipe columns and A36 for others.
Foundations:	Reinforced concrete spread footings, continuous strip footings and a 5" thick slab-on-grade.
Gravity System:	One way reinforced concrete slab spans over reinforced concrete pan joists resting on reinforced concrete girders that are supported by reinforced concrete columns. These elements transfer the loads down to reinforced concrete foundations.
Lateral System:	Reinforced concrete floor slabs act as rigid diaphragms, collecting and redistributing lateral forces to reinforced concrete shear walls in the east-west direction, and moment resisting frames (deep spandrel beams connected to columns) in the north-south direction of the South Tower. These elements transfer the loads down to reinforced concrete foundations. The elevator tower has a 3" seismic gap with the North and South Towers, with concrete shear walls around its perimeter that carry lateral loads to foundations.
Remarks:	Reinforced concrete shear walls are 10" thick (12" thick in the basement) with 2 layers of vertical (#4 bars spaced at 18" on center) and horizontal (#4 bars spaced at 16" on center) reinforcement. Reinforced concrete columns have rectangular sections of various sizes, with #7, #8 or #9 vertical bars and #4 ties spaced at 4 to 10 inches on center for columns on exterior lines. Interior columns have #3 ties spaced at 4 to 10 inches on center. Insufficient transverse reinforcement and lack of ductile detailing -- especially for the interior columns -- may lead to brittle shear failures when subjected seismic lateral movement (i.e., inter-story drift). Deep spandrels typically have #4 ties spaced at 12 inches on center (limited cases were seen with double #4 ties at 12 inches on center). These spandrels create captive columns along the east and west side the building that are prone to brittle shear failure during a seismic event. The roof-top mechanical penthouse has reinforced concrete shear walls around its perimeter. The building has vertical irregularity deficiency in parts of the lateral load resisting system where discontinuous shear walls are supported by beams or columns of lower floors (e.g., penthouse shear walls supported by roof beams and a column at the basement along the north

side of the building supporting another discontinuous shear wall). This condition may lead to additional seismic damage and overstress in the supporting members.

Condition: Fair to Good.

Architectural Notes: Exterior walls have painted concrete surfaces. The building has a built-up roof system.

Equipment Notes: Various types of equipment were observed to be well-anchored (HVAC units on roof, supply fans in roof-top pent-house, water heaters, elevator machinery, etc.)

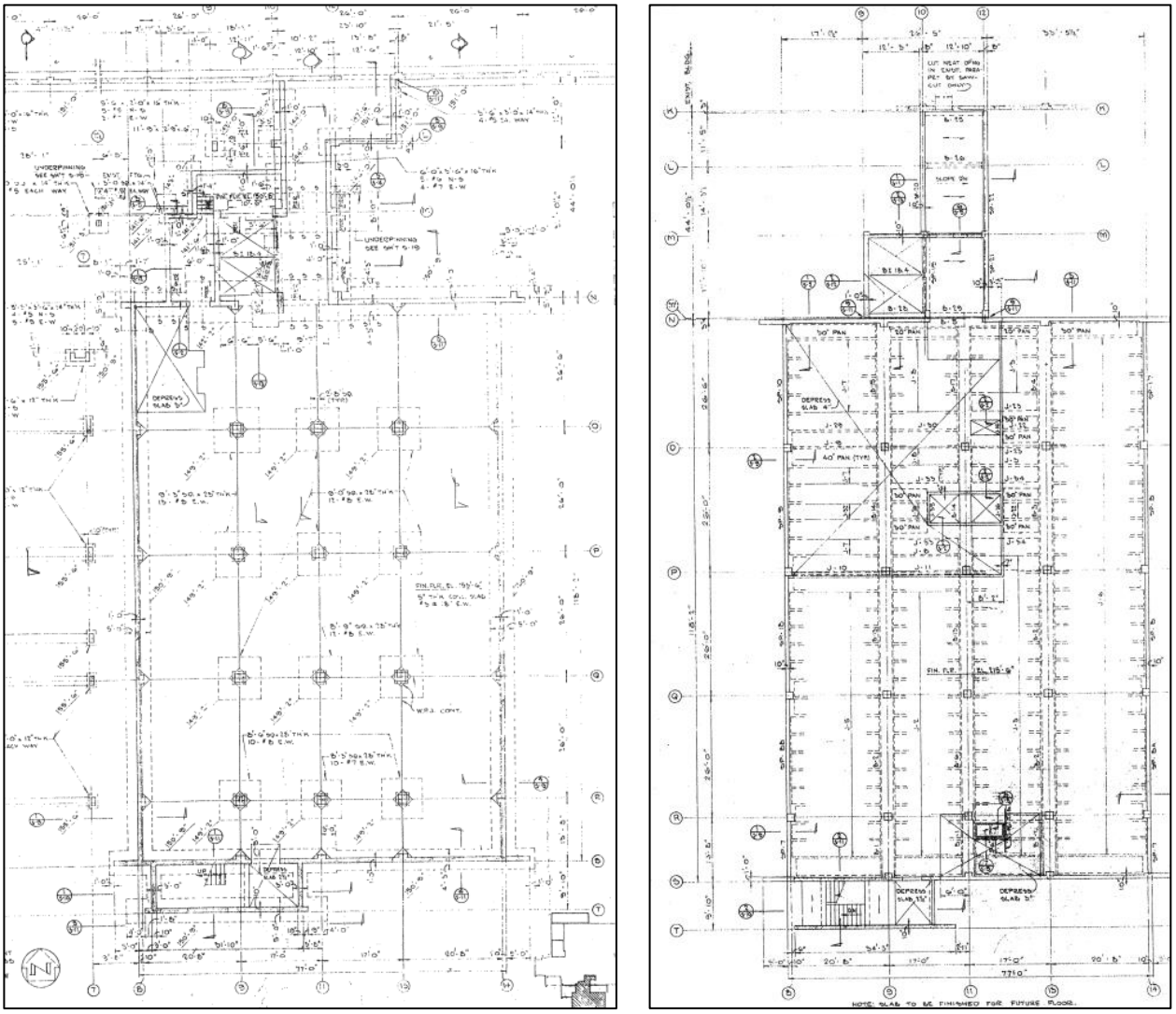


Figure 6 – Foundation and Basement Plan (Left), Roof Level Plan (Right) (South Tower and Elevator Tower)

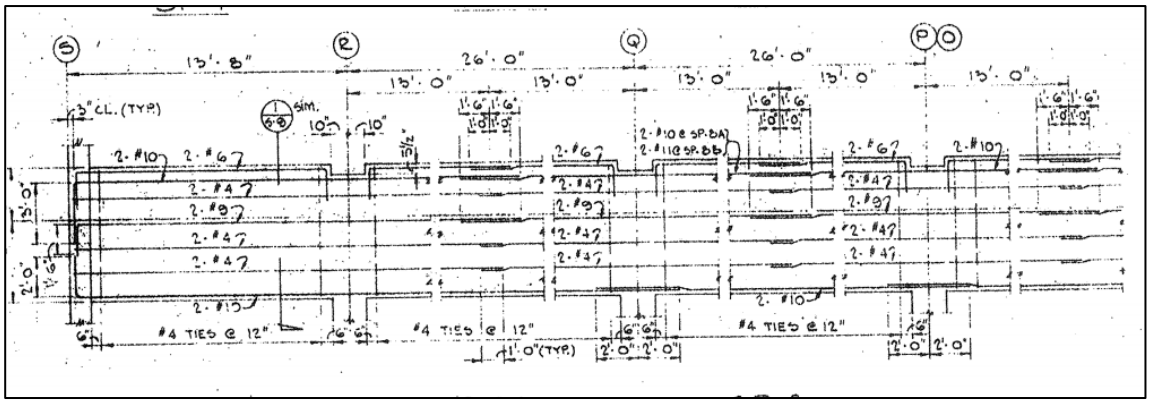


Figure 7 – Typical Spandrel Elevation (South Tower)

2.2 Additional Site Visit Notes

On August 11, 2021, R. Imani, Ph.D., P.E., S.E. of ImageCat conducted a visual survey of the 514 North Prospect building to observe current configuration, conditions, and usage. Dr. Imani met with Ms. Valerie Lee (Administrative Services Manager, BCHD) and a member of maintannce staff to walk the perimeter and inside of the buildings as well as on the roofs and in major equipment areas.

The site is generally flat. The exterior is mainly painted concrete surfaces and appears to be in good condition. The equipment at site is mostly at the same age as the buildings (with some new replacements) and appear to be anchored. These include HVAC units on the roof, supply fans and elevator machinery inside the mechanical penthouses, diesel fueled generators, transformers and other electrical panels inside rooms in the basement. Other equipment is located inside a separate building referred to as the Central Plant (located north-west of the North Low-Rise Building), which is not part of the scope for this study.

The buildings are in overall fair to good condition. Signs of age were observed, but no significant visible structural damage. Some rusting was visible on the exposed steel elements and anchorage material. The buildings are equipped with fire alarm and sprinkler systems. The main gas supply pipe observed outside the buildings is not equipped with an automatic earthquakle shut-off valve.

2.3 Building Stability and Qualitative Damage Discussion

All three structures (i.e., the North Tower, South Tower, and Elevator Tower) have complete and gravity load-carrying and lateral force-resisting systems. The North Tower was designed under the 1955 Uniform Bulding Code (UBC). The South and Elevator Towers were most probably designed under the 1964 edition of UBC. Both of these design codes pre-date the 1976 edition of UBC and, in addition to having a general seismic strength deficiency, can be classified in the non-ductile concrete structures, which are prone to brittle failure in seismic events due to lack of ductile detailing in various structural elements.

ImageCat has not performed structural calculations or developed detailed structural engineering models of the buildings. Instead, we have relied on the seismic evaluation performed by Nabih

Youssef Associates as documented in their report dated 2018. Their evaluation followed ASCE 41 methods, and included structural calculations and computer modeling.

Based on our review of the design documents and discussions with Engineers from NYA:

- In the North Tower, two columns along the north side of the building at level 2 are also supporting a discontinous shear wall. The elements supporting discontinous walls (i.e., beams, columns and diaphragm) can get overstressed during seismic events. Larger openings at first floor for some of the shear walls in the north-south direction may also lead to overstress in the shorter wall segments and a general lack of seismic strength in this floor. Captive columns created by deep spandrel beams along the north and south sides of the building are prone to brittle shear failure under seismic loading. The North Tower also has a vertical irregularity seismic deficiency caused by discontinuity of the shear walls around the roof-top penthouse, which are supported by roof-level beams.
- The South Tower has similar shear wall discontinuity issues (beams at roof level and a column in the basement are supporting shear walls above), and captive columns along the east and west sides of the building which are part of the moment frames as the only seismic load risisting elements in the north-south direction. These frames lack seismic strength and ductility and will be overstressed in seismic events.
- The elevator tower basically consists of a shear wall core that is continuous throughout its height to the foundations. Even though the level of seismic detailing is still below the minimums per current codes, the Elevator Tower should show generally adequate seismic performance.

Considering the deficiencies mentioned above, The North and South Towers in their current conditions may experience significant structural damage and do not meet the life safety requirements under the BSE-1E and BSE-2E hazard scenarios considered in the ASCE 41 standard for seismic evaluation of existing buildings.

In less technical terms, as these buildings undergo earthquake loads and experience lateral (sidesway) deformations, the lateral load resisting systems will get overstressed due to lack of strength. Overloading of these systems would lead to larger building deformations in ductile structures. However, since these buildings also lack ductility and cannot go through larger deformations, several elements including shear walls, columns and deep spandrel beams are expected to fail in a brittle manner (i.e., sudden breaking and failure rather than gradual deformation). For elements that are also carrying gravity loads, brittle failure from earthquake loads will lead failures in columns and other elements, resulting in partial or complete collapse. This translates to a significant life-safety concern. The significant damage or failure of structural systems is also combined by major damage to non-structural components (i.e., architectural finishes, ceilings, tiles, etc.) and building contents. A strong earthquake can lead to partial or complete collapse and loss of life, or result in damage that prompts the City to “red-tag” so that one or more of the buildings cannot be occupied. Even in less intense earthquake shaking, damage to non-structural components and contents can interrupt medical building operations for extended periods.

Estimated damage and collapse probablties (related to life-safety) under various hazard scenarios are studied in Section 3.

3. Seismic Risk Results

3.1 Brief Overview of Methods Used and Definitions

ImageCat performed seismic risk analysis based on the findings from review of the seismic hazards and the vulnerability assessment. In ImageCat's loss estimates, we have used ground motions from the 2014 USGS National Seismic Hazard Mapping Project. Structural damage models are adapted from "Code-Oriented Damage Assessment for Buildings" or CODA [Graf & Lee, EERI Earthquake Spectra Journal, February, 2009] and ATC-13, "Earthquake Damage Evaluation Data for California," [Applied Technology Council, Redwood City, CA, 1985 and ATC 13-1, 2002]. Seismic risk terminology follows guidelines issued by the American Society of Testing and Materials [ASTM E 2026-16a].

These models are semi-empirical, combining actual historical building performance data from past earthquakes, expert opinion, and other means to produce loss estimates for a particular class of structures. The models relate damage to seismic design parameters: building period (T), base shear (V/W or Cs), overstrength and ductility (through the R-factor). Engineering judgment is used to account for other building-specific structural features that affect structural performance (regularity, continuity, etc.). In this study, a Professional Engineer from ImageCat assessed the specific features of the building that affect seismic performance and adjusted the vulnerability models so that the risk results can reflect the particular building being examined.

Probable Loss (PL) describes the level of building damage from earthquake, expressed as a fraction of the building replacement value, having a stated probability of exceedance within a given exposure period. Alternatively, a level of earthquake damage having a stated return period. Probable Loss is found by considering all levels of earthquake hazard that may occur for the site in question, the building damage associated with each hazard level, and the variability of building damage within each hazard state. ImageCat recommends 'Probable Loss' (PL) as the best index of risk, since it relates loss directly as a function of probability.

3.2 Loss Estimates and Implications for Various Planning Alternatives

3.2.1 Maintain Status Quo – No Project to Be Planned or Executed (ALT 1)

Table A presents the probablistic seismic hazard intensities that have been used as input for the seismic risk assessment process for the buildings, examining time horizons of 3, 5, 10, 20, and 50 years. Each row in Table A provides various measures of intensity for a given probabilistic seismic hazard scenario. The intensity measures include Peak Ground Acceleration (PGA), the short-period (0.2 second) spectral acceleration (Ss), and the 1-second spectral acceleration (S1), all in units of g, where 1.0g is equal to the acceleration due to gravity.

Tables B and C below provide estimates of seismic risks for the buildings (i.e., North and South Towers) in their current condition, with no further actions taken. These estimates include building damage (a range of PL values as percentage of the total building replacement cost), downtime (a rough range of days to return to full operations), and probability of collapse (relevant to life-safety concerns). Results provided in each row only have a 10% probability of exceedance (i.e., becoming worse) during the period of considered exposure (i.e., 3, 5, 10, 20, and 50 years).

The ranges for the results attempt to indicate the level of uncertainty that should be considered for risk estimations of this type with complexities in characterization of both the seismic hazard and building vulnerability parameters.

Results are presented separately for the North and South Towers. As mentioned in the previous sections, even though the level of seismic detailing for the Elevator tower is still below the minimums per current design codes, it should generally provide adequate seismic performance due to the presence of continous shear wall core around its perimeter. The North and South Towers comprise the majority of value for the property and the major seismic deficiencies. As such, decisions for planning alternatives should be made according to results from the two towers.

Table A – Probabilistic Seismic Hazard Intensities

Seismic Hazard Scenario	PGA	Sa(0.2s)	S1
10% Probability of Exceedance in 3 Years	0.104g	0.265g	0.113g
10% Probability of Exceedance in 5 Years	0.146g	0.367g	0.163g
10% Probability of Exceedance in 10 Years	0.223g	0.544g	0.260g
10% Probability of Exceedance in 20 Years	0.318g	0.760g	0.398g
10% Probability of Exceedance in 50 Years	0.473g	1.090g	0.662g

Table B - Seismic Risk Estimates for the North Tower

Seismic Hazard Scenario	PL (%)	Downtime (Days)	Probability of Collapse
10% Probability of Exceedance in 3 Years	11-13%	135-175	1-3%
10% Probability of Exceedance in 5 Years	17-20%	210-255	3-8%
10% Probability of Exceedance in 10 Years	26-34%	270-345	9-19%
10% Probability of Exceedance in 20 Years	37-48%	390-525	20-34%
10% Probability of Exceedance in 50 Years	51-65%	570-750	37%-55%

Table C - Seismic Risk Estimates for the South Tower

Seismic Hazard Scenario	PL (%)	Downtime (Days)	Probability of Collapse
10% Probability of Exceedance in 3 Years	6-10%	110-140	1-2.5%
10% Probability of Exceedance in 5 Years	12-16%	165-205	3-7%
10% Probability of Exceedance in 10 Years	21-28%	255-330	8-16%
10% Probability of Exceedance in 20 Years	31-42%	350-465	18-30%
10% Probability of Exceedance in 50 Years	45-57%	510-690	35-49%

The ‘status quo’ alternative presents no upfront (immediate) costs or loss of service and income to BCHD, such as those that would result from demolition or retrofit construction. However, this exposes BCHD to significant levels of risk in terms of building damage and downtime losses and potential liability for loss of life, should an earthquake occur. **The building damage, downtime, and probability of collapse estimates with 10% probability of exceedance in the next 3 to 5 years are basically close to what would be expected, and deemed acceptable by most commercial lenders and institutional owners, from new buildings over a full lifetime (i.e., a 50-year exposure period).** Appendix E provides additional information on the objectives of seismic design codes and the corresponding acceptable risk. Appendix F provides information on common seismic risk criteria followed by commercial real estate lenders and institutional owners.

Beyond the next 3-5 years, the risk picture is different. Risk results presented for exposure periods of 10 to 50 years are significantly high, with probabilities of collapse that would likely be deemed unacceptable, especially for buildings that are used for assisted living, memory care, or other medical purposes.

3.2.2 Demolish Now (ALT 2)

This alternative would avoid any of the seismic risks described in the tables above. While a replacement building is being constructed (which may take 3 to 5 years), operations would need to be transferred to an alternative location, with the attendant costs and disturbance. The implications for this alternative include:

2a. Demolition costs - This includes permitting fees, basic demolition and disposal costs which can increase significantly if asbestos is confirmed to have been used during original construction, and debris hauling and landfill fees (if not included in the demolishing contractor's fees).

2b. Loss of service and income (temporarily or indefinitely) - As operations halt for demolition, and until a temporary off-site facility is procured or leased to transfer operations. Expected costs include:

2b.1 Initial setup and recurring annual costs of relocating BCHD's current operations (including community health and fitness programs which are separate from other private leases) to an off-site facility.

2b.2 Loss of annual rental income from various private leases currently active in the 514 N. Prospect building. In addition to loss of income, there may be additional implications for BCHD due to breaking of ongoing leases prior to their expiration dates, unless relevant exceptions were provided in the lease terms.

2b.3 If BCHD decides to construct a new replacement facility, costs of funding the planning and construction process would also apply to this alternative. These are described further in the next alternative.

3.2.3 Demolish in the Next 3-5 Years with Completion of a Replacement Facility (ALT 3)

This alternative balances near-term needs for service continuity with substantial progress toward seismic resilience. It presumes acceptance of the seismic risks described above for the next 3 to 5 years. Construction of a new facility could commence as the existing buildings continue current operations without loss in service or revenue, and with transfer of operations upon completion, followed by demolition and removal of the older buildings.

BCHD has already conducted preliminary studies on the market demand and financial feasibilty of constructing a new Assisted Living (AL) and Memory Care (MC) facility by considering two scenarios (i.e., a 5-story vs a 6-story building). The 6-story option was recommended to be pursued [Cain Brothers, 2020]. We note that those studies are preliminary and BCHD may conduct further reviews and updates based on the evolving market conditions, especially with regard to COVID 19.

If this alternative is pursued, Implications for BCHD include:

3a. No disruption of service or loss of income from the current activities as the existing buildings will remain operational until a coordinated transfer occurs upon completion of construction of the new facility.

3b. Construction of a new AL and MC facility (3 to 5 years):

3b.1 Project planning, financing (debt + equity from investors), design, and construction needs to be completed in the next 3-5 years, during which seismic risks for the existing buildings are acceptable.

3b.2 Since this is a new design project, BCHD would have the opportunity to set objectives for functionality (per current and future market demand), and for building performance, i.e., code-minimum or beyond current codes for Structural, Architectural, and for performance of Mechanical/Electrical/ Plumbing (M/E/P) equipment and medical service equipment. For instance, BCHD may wish to specify seismic performance criteria which is beyond minimum code requirement of achieving life-safety, leading to a design with a much-improved functional recovery time after a seismic event. This is highly recommended as relocation of residents of the AL and MC facilities can become extensively challenging post event. Having a higher seismic rating can also make the new facility attractive in a highly seismic area.

3b.3 BCHD will need to plan for a coordinated transfer of current operations to the new facility while minimizing potential disruptions. This includes operations run by BCHD or any long-term leases for tenants that would need to be transferred to the new facility.

3c. Demolition costs to remove the older building (similar to item 2a above).

3.2.4 Seismic Retrofit of the Existing Buildings (ALT 4)

Due to the complexities of the seismic deficiencies in these buildings, an effective retrofit design may require large portions or all of the buildings to be vacated during construction. As such, even though the cost of retrofit may be lower than cost of construction for a new replacement facility, much or all of the costs associated with relocation of current operations to another location may be incurred as for alternative 2 (i.e., demolish now). Further, there are limits to the improvements in seismic performance that can be achieved through retrofit at acceptable cost.

BCHD engaged NYA to conduct a seismic evaluation of the existing 514 N. Prospect building. NYA identified several seismic deficiencies for the North and South Towers, and provided a list of recommended seismic retrofit items. These recommendations were "conceptual" and intended to describe scope for rough order-of-magnitude cost estimation purposes [NYA, 2018]. According to ImageCat's conversations with BCHD, Cain Brothers conducted a financial feasibility study for the seismic retrofit alternative, using cost estimations for the retrofit project that were provided by CBRE based on NYA's recommendations. Considering retrofit costs and other financial information related to BCHD's current and potential future operations and revenue, Cain Brothers concluded that the seismic retrofit alternative is not financially feasible [Cain Brothers, 2020]. ImageCat is not in a position to verify the accuracy of the retrofit cost estimates and has asked BCHD to share additional documents with NYA, so they can (if desired) verify that current cost estimates reasonably represent

NYA's list of recommended retrofits and the incidental costs that would be incurred. These estimates should also need to be updated for current market conditions. However, ImageCat can qualitativly describe the following implications for the seismic retrofit alternative:

4a. Loss of service and income (temporarily until completion of the retrofit project), costs incurred due to transfer of operations to an offsite facility and other implications regarding breaking of on-going private leases (see items 2b.1, 2b.2 and 2b.3 above for more details as this is a shared implication with the "demolish now" alternative).

4b. Retrofit Project

4b.1 Financing, design and construction for the retrofit program needs to be completed in a reasonable time to reduce negative financial impacts. This was deemed to be financially infeasible by other consultants as mentioned above.

4b.2 Seismic retrofit projects are usually restricted from various aspects (time, costs, space) as they need to be done within the existing conditions of the building and still end up more cost-efficient compared to new construction. Given these restrictions, there are limits to the improvements that can be made to the structure's seismic performance. For the current 514 N. Prospect building, a cost-effective seismic retrofit can improve the life-safety performance up to a reasonable extent. However, attempts to achieve higher performance objectives that may be desired by BCHD (e.g., improving the performance to current code level or beyond) would lead to costs that are comparable or more than new construction.

4b.3 Seismic retrofit will improve structural performance, but the functionality of the building will be constrained by its original configuration, layout and systems of the 1950s and 1960s. This will not be in line with the demands of the current market. This challenge can only be addressed by combining the structural retrofit with a comprehensive renovation project, which could increase costs to surpass new construction. Making significant changes in various building elements would also trigger requirements to upgrade many or all of the M/E/P equipment in the building.

4c. Once the project is over, BCHD would need to increase current rental rates significantly for many years to reach the break-even point with regard to retrofit costs and the income lost during the retrofit project. The project will also significantly deplete BCHD's cash reserves.

4d. Finally, the retrofitted building would still expose BCHD to a higher level of risk in terms expected damage and downtime from earthquakes over the remaining life of the building, compared to reduced risk levels that can be achieved via new construction.

3.3 Summary and Recommendation

The following table summarizes the risks and implications described above for the four alternatives considered in this study.

Table D – Summary of Risks and Implications for Various Alternatives			
No.	**Description**	**Seismic Risks**	**Implications**
1	No Action – No Project to be Planned or Executed (Maintain Status Quo)	***Next 3-5 years:*** See seismic risks described for alternative 3. ***Next 10-50 years:*** Estimated risks are significantly high, with probabilities of collapse likely deemed unacceptable, especially for buildings that are used for assisted living, memory care, or other medical purposes.	This alternative has no immediate costs, but will expose BCHD to significant (and likely deemed unacceptable) economic and life-safety risks due to future probabilistic seismic activity in the area.
2	Demolish Now	N/A	This alternative avoids seismic risks, but leads to loss of service and income (temporarily or indefinitely), as operations halt for demolition, and until a temporary off-site facility is procured or leased with the attendant costs to transfer operations.
3	Demolish in the Next 3-5 Years and Replace with New Buildings	The building damage, downtime, and probability of collapse estimates with 10% probability of exceedance in the next 3 to 5 years are generally consistent with those deemed acceptable by most commercial lenders and institutional owners, from new buildings over a full lifetime (i.e., a 50-year exposure period).	This alternative balances near-term need to maintain service with the long-term goal to improve seismic resilience. It presumes acceptance of the seismic risks described for the next 3 to 5 years. BCHD will have the opportunity to set objectives for building functionality (per current and future market demand), and performance (architectural, structural, and M/E/P). This option has been deemed financially feasible in preliminary studies by other consultants.
4	Seismic Retrofit of Existing Buildings	While the retrofit project is being planned and constructed, seismic risk levels are similar to those mentioned in alternative 3, except for the reduced life-safety concerns as the buildings will be vacated, leaving just the construction crew at site during the retrofit project. Seismic risks after the completion of the project will substantially reduce in terms of life-safety, with less likely reductions in the building damage and downtime categories due to the limitations of cost-effective retrofit projects.	Complexities of the retrofit construction will necessitate vacating the existing buildings, thereby requiring procurement of off-site temporary facilities with the attendant costs to transfer operations. There are limits to the improvements in seismic performance that can be achieved through retrofit at acceptable cost. The functionality of the building will also be limited by its original configuration from 1960s. This option has been deemed financially infeasible in preliminary studies by other consultants.

From the above table, it appears that Alternative No. 3, "Demolish in the Next 3-5 Years and Replace with New Buildings" provides the best choice among the four alternatives, consistent with BCHD's defined objectives.

4. Limitations

All work was performed by Professional Engineers (Civil and Structural). The scope of work performed included assessment of geologic hazards based on published maps, the recent geotechnical investigation report [Converse Consultants, 2016], and ground shaking models adapted by ImageCat from the U.S. Geological Survey.

We reviewed various available Architectural and Structural design drawings (original and expansion sets), and the Seismic Evaluation report [Nabih Youssef Associates (NYA), 2018]. We conducted multiple discussions with Engineers from NYA to obtain a detailed understanding of their findings on the structure's characteristics and current conditions and shared our observations. A Structural Engineer from ImageCat conducted a visual survey at site to assess existing configuration, conditions, and usage.

To examine seismic risks for the structures in their status quo conditions, ImageCat performed risk analysis using SeismiCat, ImageCat' earthquake risk tool for individual sites. Results include tables and curves relating the severity of the estimated probabilistic risk to various return periods (short- and long-term) along with corresponding information on building stability, and downtime.

ImageCat also qualitatively described the outcomes and implications of the other considered alternatives according to our understanding, conversations with BCHD, and review of various financial and feasibility studies conducted by other consultants [Cain Brothers, CBRE, 2020].

ImageCat did not design the buildings, and design and construction professionals bear responsibility for the structure. Additional design deficiencies may be revealed through detailed structural analysis and calculations -- beyond the scope of the current review. Our seismic risk findings assume that the construction will utilize good materials, conforming to the prevailing code and good practice. Additional risk (unexpected earthquake damage) may result if poor materials or construction practices are used, or if the completed construction deviates from the approved designs. Construction quality should be verified upon completion.

Seismic risk assessment is subject to many uncertainties – in the estimation of seismic hazards, and in estimating building performance given the seismic hazards. The models used reflect the current state of knowledge and its limitations.

ImageCat warrants that its services are performed with the usual thoroughness and competence of the consulting profession, in accordance with the current standard for professional services, in the location where the services are provided. No other warranty or representation, either expressed or implied, is included or intended in its proposals or reports.

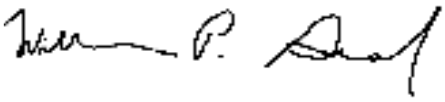
- o O o -

We are pleased to have the opportunity to provide seismic risk consulting services to BCHD. Should you have any questions regarding the results of this seismic risk assessment, please email or call.

Sincerely,

ImageCat, Inc.





Reza Imani, PhD., P.E., S.E.
Manager, Structural Engineering & Risk Mitigation

William P. Graf, P.E. Civil
Vice President, Engineering

Attached:

A. Nabih Youssef Associates, March 27, 2018, "Seismic Evaluation of Beach Cities Health District 514 North Prospect Avenue & Central Plant Redondo Beach, CA"
B. Fault Descriptions
C. Earthquake Risk Glossary
D. Qualifications
E. Seismic Design Code Objectives
F. Commercial Real Estate Lender and Owner Criteria for Seismic Risk

Appendix A – NYA's Seismic Evaluation Report

Nabih Youssef Associates, March 27, 2018, "Seismic Evaluation of Beach Cities Health District 514 North Prospect Avenue & Central Plant Redondo Beach, CA"

SEISMIC EVALUATION
Of

Beach Cities Health District

514 North Prospect Avenue & Central Plant
Redondo Beach, CA

Prepared for:

Beach Cities Health District
514 North Prospect Avenue, 1st Floor
Redondo Beach, CA 90277



Prepared by:

Nabih Youssef Associates
Structural Engineers
550 South Hope Street, Suite 1700
Los Angeles, California 90071
NYA Job # 17171.00

March 27, 2018

TABLE OF CONTENTS

1.0 BUILDING DESCRIPTION
- 1.1 Gravity System
- 1.2 Lateral System

2.0 SEISMIC EVALUATION
- 2.1 Identified Deficiencies

3.0 RECOMMENDATIONS

1.0 BUILDING DESCRIPTION

The former hospital building at 514 North Prospect was originally constructed in 1958 and consists of a 4-story tower (referred to hereinafter as the north tower) and single-story extension to the north. The south tower and elevator tower were added in 1967 and each consists of 4-stories. The north tower, elevator tower, and south tower have a single story basement. There are seismic joints that structurally separate the north low rise, north tower, elevator tower and south tower into four discrete structures. The central plant is a stand-alone single-story building. Refer to Figure 1 for an aerial view of the project site.

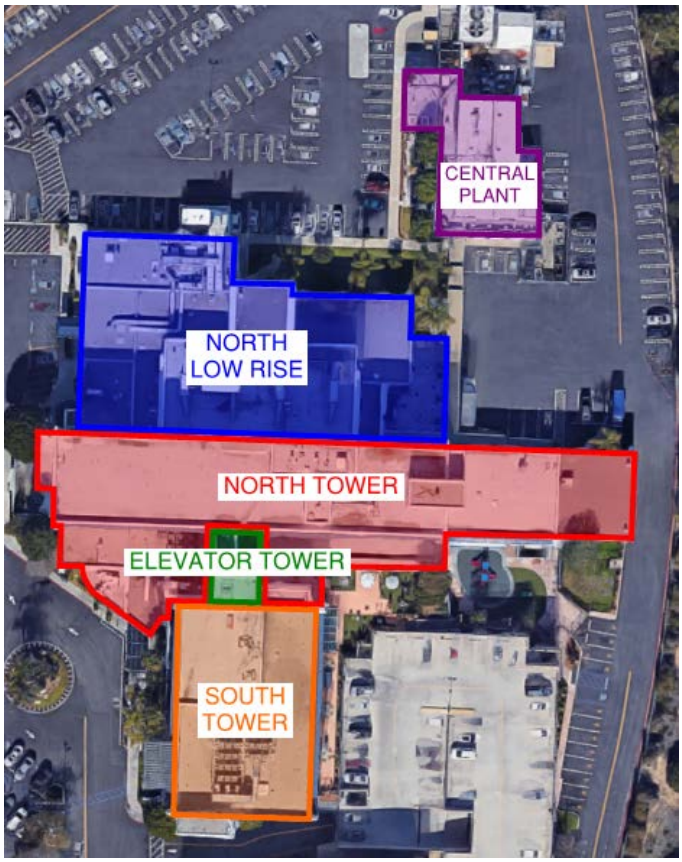


Figure 1 – Aerial View of 514 North Prospect and Central Plant

1.1 Gravity System

The gravity framing system for the north low rise, north tower, elevator tower, and south tower typically consists of concrete slabs 3-4 ½" thick supported by concrete joists and girders. The floor and roof framing is supported by concrete columns that extend down to the foundation.

The gravity framing system for the central plant consists of plywood sheathing at the roof supported by timber joists and girders. The timber girders are supported by steel pipe columns at the interior of the building and reinforced masonry walls along the perimeter.

1.2 Lateral System

The lateral force resisting system for the north tower consists primarily of concrete shear walls in both directions of the building. There are also deep concrete spandrels framing to concrete columns along the north and south sides of the building that act as moment frames (refer to figure 2). The floors and roof contain concrete slabs that form rigid diaphragms that distribute seismic induced forces to the walls and frames.



Figure 2 – View of South Side of North Tower

The lateral force resisting system for the east-west direction of the south tower consists of concrete shear walls located along the north and south sides of the building. In the north-south direction there are deep concrete spandrels framing to concrete columns (similar to the north tower) that act as moment frames. The floors and roof contain concrete slabs that form rigid diaphragms that distribute seismic induced forces to the walls and frames.

Both towers have a mechanical penthouse that sits on top of the roof that contains concrete shear walls around the perimeter. Most of the shear walls at both penthouses are discontinues and supported by concrete beams at the roof.

The lateral force resisting system for the north low rise building consists of multiple concrete shear walls in both directions of the building. The roof consists of a concrete slab that forms a rigid diaphragm that distributes seismic induced forces to the shear walls.

The lateral force resisting system for the elevator tower consists of concrete shear walls forming a core around the elevator that are continuous to the foundation.

The lateral force resisting system of the central plant consists of reinforced masonry shear walls around the perimeter of the building. The roof consists of a plywood diaphragm and anchors connecting the perimeter masonry walls to the timber framing (refer to figure 3).



Figure 3 –View of Central Plant

2.0 SEISMIC EVALUATION

A Tier 1 and deficiency only Tier 2 evaluation of the building's expected seismic performance was performed using ASCE 41-13, *Seismic Evaluation and Retrofit of Existing Buildings*. ASCE 41 is a national standard used to seismically evaluate existing buildings. The parameters used to for the evaluation are listed in Table 1. Assumed properties used in the evaluation were based on existing drawings and ASCE 41-13.

Table 1 – Evaluation Parameters

Performance Level	Life Safety Collapse Prevention
Seismic Hazard Level	BSE-1E (20% in 50 year event) BSE-2E (5% in 50 year event)
Level of Seismicity	High (S_{ds} > 0.5g and S_{d1} > 0.2g)
Building Type	C1 (Concrete Moment Frames) C2 (Concrete Shear Walls, Stiff Diaphragm) RM1 (Reinforced Masonry Bearing Walls, Flexible Diaphragm)
Soil Type	D
Seismic Parameters	$S_{XS,BSE-1E}$ = 0.762g $S_{X1,BSE-1E}$ = 0.419g $S_{XS,BSE-2E}$ = 1.192g $S_{X1,BSE-2E}$ = 0.660g

2.1 Identified Deficiencies

Based on the results of the analysis performed, extensive deficiencies were identified in both the north and south towers, and minor deficiencies were identified in the central plant. No deficiencies were identified for either the north low rise or elevator tower.

The identified deficiencies in the north tower include the following:

- The concrete beams at the roof that support the discontinuous shear walls in the penthouse above are overstressed in shear and flexure.
- Portions of the roof diaphragm are overstressed in shear.
- Two columns along the north side of the building at level 2 that support a discontinuous shear wall are overstressed.
- The deep concrete spandrels along the north and south sides of the building create captive columns that are susceptible to shear failure in a seismic event.
- Three concrete shear walls in the north-south direction have additional openings at the first and/or basement levels that result in the remaining wall being overstressed.

The identified deficiencies in the south tower include the following:

- The concrete beams at the roof that support the discontinuous shear walls in the penthouse above are overstressed in shear and flexure.
- One column along the north side of the building at the basement level that supports a discontinuous shear wall is overstressed.
- Many interior concrete columns have insufficient confinement reinforcement for seismic drift induced forces (i.e. deformation compatibility).
- The deep concrete spandrels along the east and west sides of the building create captive columns that are susceptible to shear failure in a seismic event. These frames are the only existing lateral system in the north-south direction of the south tower and are highly overstressed in flexure and shear.

The identified deficiencies in the central plant include the following:

- The existing ties between the perimeter reinforced masonry walls and plywood diaphragm are deficient.

3.0 RECOMMENDATIONS

Recommended seismic improvements have been developed based on the assessment of the existing building seismic performance using ASCE 41-13 criteria. The proposed strengthening is conceptual and is intended to identify representative scope for rough order of magnitude estimate of cost.

Recommended seismic strengthening for the north tower includes:

- Strengthen concrete beams below the discontinuous penthouse walls.
- Strengthen overstressed portions of the roof diaphragm.
- Strengthen columns at discontinuous shear walls.
- Slot cut the deep spandrel beams along the north and south sides of the building.
- Infill select openings in the north-south concrete shear walls.
- Strengthen foundations below the infilled concrete shear walls.

Recommended seismic strengthening for the south tower includes:

- Strengthen concrete beams below the discontinuous penthouse walls.
- Add new braced frames in the north-south direction. Two bays of braced frames at both the east and west sides of the building (four bays total) just outboard of the existing concrete frames recommended.
- Strengthen columns at new braced frames.
- Add new collectors along the east and west sides of the building to drag load into the new braced frames.
- Add fiber reinforced polymer (FRP) wrap around interior concrete columns.
- Slot cut the deep spandrel beams along the east and west sides of the building.
- Strengthen foundations below new braced frames.

Recommended seismic strengthening for the central plant includes:

- Add new Simpson straps and blocking at the roof to brace the perimeter reinforced masonry.

Appendix B – Fault Descriptions

Redondo Canyon Fault
Palos Verdes Fault
Compton Thrust Fault
Newport-Inglewood-Rose Canyon Fault Zone

Quaternary Fault and Fold Database of the United States

Redondo Canyon fault (Class A) No. 130

Citation
Treiman, J.A., compiler, 1998, Fault number 130, Redondo Canyon fault, in Quaternary fault and fold database of the United States:

Synopsis
There is little published information on this fault; it may receive some slip transferred from the Palos Verdes fault zone and is interpreted to accomodate uplift of the Palos Verdes Hills; location and activity based on marine geophyisical interpretation.

Name comments
First located by Emery (1960 #6130) and later by Yerkes and others (1967 #6132) along axis of canyon; later work by Nardin and Henyey (1978 #6131) identified the fault as a reverse fault on the south flank of the canyon rather than along the canyon axis; to the east the fault the joins Palos Verdes fault zone [128].

Fault ID: Refers to number 436 (Redondo Canyon fault) of Jennings (1994 #2878); Fault ID 8 of Hecker and others (1998 #6118); number 36 (Redondo Canyon fault) of Ziony and Yerkes (1985 #5931).

County(s) and State(s)
LOS ANGELES COUNTY, CALIFORNIA (offshore)

Physiographic province(s)
PACIFIC BORDER (offshore)

Reliability of location
Poor
Compiled at 1:100,000 scale.

Comments: Inferred trace digitized at 1:100,000 from photo-enlargement of original 1:250,000 map (Vedder and others, 1986 #5971).

Geologic setting
High-angle, down to the north, reverse fault separates Palos Verdes Hills structural block from the Santa Monica basin to the north; may absorb some dextral slip from Palos Verdes fault zone [128] or may transfer this slip further offshore.

Length (km)
12 km.

Average strike
N90°WW

Sense of movement
Reverse

Comments: Described as a north-dipping normal fault by earlier workers.

Dip Direction
S Comments: High-angle dip is assumed as summarized by Hecker and others (1998 #6118).

Paleoseismology studies

Geomorphic expression
Fault zone may have provided structural control for Redondo Canyon (submarine), but fault is identified along south flank of canyon rather than along canyon axis; scarps and warps also summarized by Hecker and others (1998 #6118) from Nardin and Henyey (1978 #6131); in a larger sense, the Palos Verdes Hills may represent uplift of the south side of the fault.

Age of faulted surficial deposits
Presumed Holocene sediments (Nardin and Henyey, 1978 #6131; Vedder and others, 1986 #5971)

Historic earthquake

Most recent prehistoric deformation
latest Quaternary (<15 ka)

Comments: Timing of most recent movement based on marine geophysical interpretation.

Recurrence interval

Slip-rate category
Between 0.2 and 1.0 mm/yr

Comments: Slip rate is inferred to be similar to the vertical uplift rates for Palos Verdes fault zone [128].

Date and Compiler(s)
1998
Jerome A. Treiman, California Geological Survey

Palos Verdes fault zone, Palos Verdes Hills section (Class A) No. 128b

County(s) and State(s)
LOS ANGELES COUNTY, CALIFORNIA

Physiographic province(s)
PACIFIC BORDER

Reliability of location
Poor
Compiled at 1:250,000 scale.

Length (km)
This section is 12 km of a total fault length of 73 km.

Average strike
N57°W (for section)

Sense of movement
Right lateral

Dip
50° SW. to 90°

Historic earthquake

Most recent prehistoric deformation
late Quaternary (<130 ka)

Slip-rate category
Between 1.0 and 5.0 mm/yr

Compton thrust fault (Class A) No. 133

Citation	Fisher, M.A., and Bryant, W.A., compilers, 2017, Fault number 133, Compton thrust fault, in Quaternary fault and fold database of the United States
Synopsis	The Compton thrust fault (blind) extends below the western Los Angeles Basin, lying entirely within Mesozoic metamorphic basement (Catalina Schist) (Shaw and Suppe, 1996). Most of the thrust fault is a ramp that rises to the southwest from depths as great as 10 km up to 5 km. The ramp connects the Central Basin Decollement, a thrust flat below the Los Angeles Basin, with shallower parts of the thrust fault near its tip below the Palos Verdes Peninsula. Leon and others (2009) identified 6 events in the past 14 ka, established event dates, and estimated a thrust fault slip rate of 1.2+0.5, -0.3 mm/yr.
Name comments	Variously referred to as the Compton Thrust, Compton ramp, Compton thrust ramp, and Compton thrust system by Shaw and Suppe (1996). Also referred to as the Compton-Los Alamitos trend in reference to the growth fold above the Compton ramp.
County(s) and State(s)	LOS ANGELES COUNTY, CALIFORNIA
Physiographic province(s)	PACIFIC BORDER
Reliability of location	Compiled at 1: scale. *Comments:* Location of fault from Qt_flt_ver_3-0_Final_WGS84_polyline.shp (Bryant, W.A., written communication to K.Haller, August 15, 2017) based on geometric representation of Compton Thrust Fault ramp is from Community Fault Model (Plesch and others 2007).
Geologic setting	The Compton thrust fault is one several blind thrust faults that pose an earthquake hazard to urban Los Angeles. Miocene through Quaternary sedimentary rocks within the Los Angeles Basin and the upper part of their Mesozoic basement are transported upward and southwestward along the Compton thrust fault.
Length (km)	km.
Average strike	
Sense of movement	Thrust
Dip	0–28° NE. *Comments:* Fault is flat lying beneath offshore and coastal areas and dips 22˚ NE. east of the coastal zone (Shaw and Suppe, 1996; Leon and others 2009).
Paleoseismology studies	Site 133-1 – Stanford Avenue site by Leon and others (2009) involved the interpretation of high resolution seismic reflection lines and the excavation of ten 25–35 m deep, continuously cored boreholes along Stanford Avenue, Los Angeles. Leon and others (2009) identified as many as 6 discrete fold scarps associated with displacement along the Compton thrust fault ramp, and estimated a slip rate (thrust) of 1.2+0.5, -0.3 mm/yr.
Geomorphic expression	
Age of faulted surficial deposits	The fault does not extend to the ground surface, but Quaternary sediment apparently is flexed upward in the kink band associated with the Compton thrust ramp, indicating Quaternary activity (Shaw and Suppe, 1996). Leon and others (2009) identified Holocene fluvial deposits deformed within back-limb fold structure during uplift events associated with displacement along the Compton thrust fault ramp. Ages, based on calibrated radiocarbon dates from 30 humic, charcoal, and bulk soil samples indicate sediment accumulation over the past 14 ka.
Historic earthquake	
Most recent prehistoric deformation	latest Quaternary (<15 ka) *Comments:* Possibly inactive during the late Quaternary (since about 1.5 Ma, Foxall, 1997); however, the Palos Verdes fault [128] is kinematically related to the Compton thrust fault and the Holocene activity along the Palos Verdes fault could suggest the underlying Compton thrust fault was active in the Holocene as well.
Recurrence interval	Leon and others (2009) identified six paleoseismic events at the Stanford Avenue [133-1] site: Event 1: 0.7–1.75 ka Event 2: 1.9–3.4 ka Event 3: 5.6–7.2 ka Event 4: 5.4–8.4 ka Event 5: 10.3–12.5 ka Event 6: 10.3–13.7 ka
Slip-rate category	Between 0.2 and 1.0 mm/yr *Comments:* Shaw and Suppe (1996) estimated long term slip rate of 1.4±0.4 mm/yr. Leon and others (2009) calculated average Holocene (past 14 ka) slip rate of 1.2+0.5/-0.3 mm/yr using cumulative thrust displacement of 16.9+7.5/-6.9 m derived from dip of 28±3° dip of Compton thrust fault ramp.
Date and Compiler(s)	2017 Michael A. Fisher, U.S. Geological Survey William A. Bryant, California Geological Survey

Newport-Inglewood-Rose Canyon fault zone, south Los Angeles Basin section (Class A) No. 127b

Synopsis

General: Data on this fault zone is variable. Fault locations onshore and in some limited offshore areas are generally well located. The large central portion of the fault zone is offshore and less well defined. Urbanization in the San Diego area has also somewhat limited the accurate location of some of the fault strands. The northern onshore portion is demonstrably Holocene based on numerous geotechnical studies as well as the historic Long Beach earthquake. The southern onshore portion, through San Diego, is also demonstrably active based on geotechnical and research studies. The intermediate offshore portion is presumed Holocene based on sparse evidence of displacement of presumed young Holocene sediments offshore as well as its continuity to the better-defined onshore sections. There are three detailed study sites along the fault zone. Grant and others (1997 #1366) reported evidence for 3–5 earthquakes in the past 11.7 ka, but stated that the recurrence interval varied from 1,200 yr to 3,000 yr. Slip rate is not fully constrained, but appears to be approximately 1.0±0.5 mm/yr in the north, increasing to 1.5±0.5 mm/yr in the south.

Sections: This fault has 7 sections. Section designations after Fischer and Mills (1991 #6468) who designated three segments offshore, two segments onshore south of La Jolla and one southern segment within the Los Angeles basin (thereby implying a northern, 7th segment as well). Sections were distinguished based on asperities (bends), steps and seismicity. The division of the Los Angeles basin part of the fault zone into two segments is based on slight differences in geometry (discussed by several workers, including Wright (1991 #5950), seismicity differences (Hauksson, 1987 #6475), and the subsurface extent of the 1933 Long Beach earthquake rupture (Wesnousky, 1986 #5305; Hauksson and Gross, 1991 #6476). Fischer (1992 #6467) designates one additional segment offshore. Working Group on California Earthquake Probabilities (1995 #4945) and Petersen and others (1996 #4860) identify three sections: Newport-Inglewood, Newport-Inglewood offshore and Rose Canyon (the latter including offshore faults north to Oceanside).

Name comments

General: Entire fault zone referred to as Newport-Inglewood-Rose Canyon fault zone by Greene and others (1979 #6470). Newport-Inglewood fault: onshore structural zone first recognized as a zone of folding by Mendenhall (1905 #6488). Hamlin (1918 #6473) associated seismicity and faulting with the zone; first mapped and named by Taber (1920 #6491) as the Inglewood-Newport-San Onofre fault; called Newport-Inglewood fault by Hoots (1931 #5921). Eaton (1933 #6463) was first to suggest continuity to Rose Canyon fault in the San Diego area; offshore portion was called the South Coast Offshore fault by utility consultants (Southern California Edison Co. and San Diego Gas and Electric Co., 1972 #6490), and the South Coast Offshore Zone of Deformation by Woodward-Clyde Consultants (1979 #6496). Rose Canyon fault: Fairbanks (1893 #6466) suggested presence of fault and Ellis and Lee (1919 #6465) were the first to show part of the fault on a map. Hanna (1926 #6474) referred to the Soledad Mountain fault; Hertlein and Grant (1939 #6477) were the first to refer to the Rose Canyon fault; Kennedy (1975 #6478) and Kennedy and others (1975 #6480) mapped the fault in greater detail. See sections 127f and g for additional fault strands.

Section: Section name from Fischer and Mills (1991 #6468); includes Cherry-Hill fault, Northeast Flank fault, Reservoir Hill fault, Seal Beach fault, and North and South Branch Newport-Inglewood faults; North Branch fault has also been called the High School fault; section extends southeastward from the Dominguez Hills to Newport Beach.

Fault ID: Refers to numbers 434 (Potrero, Inglewood and Avalon-Compton faults), 439 (South Branch, Newport-Inglewood fault zone), 440 (North Branch, Newport-Inglewood fault zone), 441 (Cherry-Hill, Reservoir Hill and Seal Beach faults), 465 (Newport Inglewood-Rose Canyon fault zone, offshore), 487 (Mission Bay fault), 490 (Coronado fault, offshore), 490A (Spanish Bight fault, offshore), 491 (Rose Canyon fault zone), 492 (Old Town fault), and 493A (Silver Strand fault, offshore) of Jennings (1994 #2878). Also refers to numbers 30 (Newport-Inglewood, north section) and 31 (Newport-Inglewood, south section) of Hecker and others (1998 #6118), and to numbers 25 (Inglewood fault), 26 (Potrero fault), 27 (Avalon-Compton fault), 28 (Cherry-Hill fault), 29 (Reservoir Hill fault), 30 (Newport-Inglewood North Branch), 31 (Newport-Inglewood, South Branch), and 32 (Faults offshore of San Clemente) of Ziony and Yerkes (1985 #5931).

County(s) and State(s)

LOS ANGELES COUNTY, CALIFORNIA
ORANGE COUNTY, CALIFORNIA

Physiographic province(s)

PACIFIC BORDER

Reliability of location

Good
Compiled at 1:24,000; 1:31,680; 1:48,000 and unspecified scale.

Comments: Location of fault from Qt_flt_ver_3-0_Final_WGS84_polyline.shp (Bryant, W.A., written communication to K.Haller, August 15, 2017) attributed to Bryant (1985, 1988), California Department of Water Resources (1966), Guptil and Heath (1981), Morton and Miller(1981), and Poland and others (1956).

Geologic setting

This fault zone is a major structural element within the Peninsular Ranges. Both onshore, to the north, and in the offshore region the fault zone separates contrasting Mesozoic basement terrane-Catalina Schist on the west and metasediments, intrusives and volcanics to the east (Yerkes and others, 1965 #5930).

The onshore Los Angeles basin reach of the fault zone is marked by a northwesterly trending line of generally en echelon anticlinal folds and faults that extends 40 miles from Newport Mesa to the Cheviot Hills along the western side of the Los Angeles Basin (Barrows, 1974 #6460); the zone is tentatively extended northward to the Santa Monica [101] and Hollywood [102] faults by Wright (1991 #5950). The onshore structural zone is an important petroleum-producing region.

The offshore reach of the fault zone continues southeastward until offshore of Oceanside where it bends and steps and continues on a more south-southeast trend, paralleling the coastline. The Rose Canyon fault [127e, 127f] comes onshore at La Jolla and is characterized by zones of compression and extension associated with restraining and releasing bends in the faults. The fault zone is locally more than 1 km wide and is composed of both dip-slip and strike-slip en echelon faults that together extend from La Jolla Cove 50 km to San Diego Bay and beyond on the south (Treiman, 1993 #6494).

Length (km)

This section is 34 km of a total fault length of 209 km.

Average strike

N51°W (for section) versus N29°W,N27°W,N31°W (for whole fault)

Sense of movement

Right lateral

Comments: Legg and Kennedy (1991 #6486) report pure dextral strike slip; supported by seismicity as reported by Hauksson (1990 #6879).

Dip Direction

NE; SW

Comments: Dip assumed by Petersen and others (1996 #4860); generally high-angle to near vertical, but locally dips either NE or SW (Wright, 1991 #6878).

Numerous consulting studies (on file with the California Geological Survey, Alquist-Priolo Earthquake Fault Zoning project) have addressed location and recency of faulting.

Paleoseismology studies

Site 127-2: Huntington site by Grant and others (1997 #1366) involved drilling and analyzing 72 CPT borings, spaced between 7 to 30 m apart across the North Branch fault just northwest of Huntington Mesa. Grant and others (1997 #1366) identified at least three and possibly five surface-rupturing earthquakes in the past 11.7 ka. Dates of the events were established using 14C dates from samples collected from continuously cored borings.

Geomorphic expression

Large-scale features include a line of hills underlain by en echelon anticlinal folds and faults; small- to intermediate-scale features include scarps, pressure ridges, deflected drainages, linear drainages, closed depressions and troughs (Bryant, 1988 #6461).

Age of faulted surficial depos

Holocene alluvial deposits and soils; late Pleistocene Inglewood Formation; late Pleistocene marine and non-marine terrace deposits; Pleistocene Lakewood Formation (Bryant, 1988 #6461).

Historic earthquake

latest Quaternary (<15 ka)

Comments: Timing of most recent paleoevent is poorly constrained. Historic events (without surface rupture) include 1933 M6.3 Long Beach earthquake and perhaps 1812 (12/08/1812); no details available on individual or most recent pre-historic events.

Most recent prehistoric defor

1,200–3,000 yr

Comments: Recurrence interval reported by Freeman and others (1992 #6469) and Grant and others (1997 #1366). Grant and others (1997 #1366) recognized at least three and as many as five surface-rupturing earthquakes in the past 11.7 ka at the Huntington site. The two oldest Holocene events occurred within approximately 1,200 yr of each other, but at least 3,000 yr passed between early and middle Holocene events.

Recurrence interval

Between 1.0 and 5.0 mm/yr

Comments: 0.5 mm/yr long-term horizontal geologic slip-rate derived from offset facies in oil well logs (Freeman and others, 1992 #6469); Wesnousky (1986 #5305) and Working Group on California Earthquake Probabilities (1995 #4945) assume 1.0 mm/yr; Clark and others (1984 #2876) reported 0.6–1.2 mm/yr vertical slip rate at Bolsa Chica Mesa which may not be representative of total slip on the deeper seismogenic structure.

Slip-rate category

1999

Date and Compiler(s)

Jerome A. Treiman, California Geological Survey
Matthew Lundberg, California Geological Survey

Appendix C – Earthquake Risk Glossary

Acceleration	The rate of change of velocity. As applied to strong ground motions, the rate of change of earthquake shaking velocity of a reference point. Commonly expressed as a fraction or percentage of the acceleration due to gravity (g), wherein g = 980 centimeters per second squared.
Active Fault	An earthquake fault that is considered to be likely to undergo renewed movement within a period of concern to humans. Faults are commonly considered to be active if they have moved one or more times in the last 10,000-11,000 years, but they may also be considered potentially active when assessing the hazard for some applications even if movement has occurred in the Quaternary Period (2M years). See also *fault.*
Aggregate Loss Curve	Also known as risk curves. A curve that present risk severity (dollars lost, lives lost, injuries, days of business interruption, etc.) versus frequency or probability. The plots in this report show annual probability of exceedance as the Y-axis, and portfolio-wide loss ($) as the X-axis. The Y-axis (probability of exceedance) is also translated into average return period – the average time between loss levels of the same severity.
Alluvium	A soil type consisting of loosely compacted gravel, sand, silt, or clay deposited by streams.
Amplification	An increase in seismic wave amplitude as the waves propagate through certain soils, in sedimentary basins, or in certain topographic configurations (e.g. along ridge lines).
Average Annual Loss	The loss per annum due to hazards, calculated as the probabilistic loss contribution of all events. The expected annual loss is the expectation of the probability distribution of loss per annum, and under certain assumptions may be calculated as the probability-weighted average-of loss due to all possible hazard events.
Alquist-Priolo (A-P) Special Studies Zone	More recently known as Earthquake Fault Zone (EFZ). In California, these are defined areas surrounding active faults, as defined by the State Geologist, within which it is necessary to perform fault location studies in order to construct buildings for human occupancy. Buildings for human occupancy may not be constructed within a prescribed distance of the identified fault rupture trace. Details of the regulations are presented in Special Publication 42, published by the California Division of Mines and Geology (CDMG).
Attenuation	The rate at which seismic, wind, or water intensities decrease with distance from their sources or shoreline landing points.
Average (Expected) Annualized Loss	*See Average Annual Loss.*

Business Interruption (BI) Loss	Economic loss associated with loss of function of a commercial enterprise.
Cat Bond	Catastrophe Bond. An alternative risk financing instrument which exploits the capital markets for insurance capacity. A number of different forms exist. In a parametric Cat bond, investors purchase the bonds at a face value, and will receive principal and interest after a specified period, provided a defined event does not occur. The event is defined by objective parameter, determined by a neutral, authoritative third party. For an earthquake Cat bond, the event may be defined according to magnitude and epicenter location, and the degree of forfeiture by the bond investor typically varies according to a schedule of event thresholds and geographic bounds.
Damage	Physical disruption, such as cracking in walls or overturning of equipment (often used synonymously but erroneously with Loss).
Damping	The dissipation of energy in the process of viscous flow, deformation of viscoelastic materials, frictional sliding, or permanent material deformation or yielding (hysteretic damping).
Deductible (Insurance)	The amount of loss above which an insurance payment is due to the insured.
Deterministic	A method of engineering and decision-making evaluation based solely on the selection of a few natural hazards events used as scenarios. For instance, an historical earthquake may be taken as a scenario to see what would happen if that earthquake recurred. Deterministic methods are typically based on source models and intensity propagation methods that exclude random effects.
Ductility	The ability to sustain deformation beyond the elastic limit (yield) without material failure.
Ductile Detailing	Design details specifically intended to achieve an intended stable yielding mechanism in a building structure or equipment support structure. For example, special requirements for the placement of the reinforcing steel within structural elements of reinforced concrete and masonry construction necessary to achieve non-brittle, ductile behavior (ductility). Ductile detailing may include close spacing of transverse reinforcement to attain confinement of a concrete core or to prevent shear failures, appropriate relative dimensioning of beams and columns and 135 degree hooks on lateral reinforcement.
Duration	The time interval in earthquake ground shaking during which motion exceeds a given threshold. For example, the measure of duration to be used as a measure of damage potential to buildings might be the time interval over which acceleration at the base of a building exceeds, say, 5 percent of the acceleration of gravity.
Earthquake	A sudden ground motion or trembling caused by an abrupt release of accumulated strain acting on the tectonic plates that comprise the Earth's crust. A sudden motion or trembling in the earth caused by the abrupt release of slowly accumulated strain.

Earthquake Fault Zone	See also Alquist-Priolo Special Studies Zone. In California, these are defined areas surrounding active faults, as defined by the State Geologist, within which it is necessary to perform fault location studies in order to construct buildings for human occupancy. Buildings for human occupancy may not be constructed within 50 feet of the identified fault rupture trace. Details of the regulations are presented in Special Publication 42, published by the California Division of Mines and Geology (CDMG).
Earthquake Hazard	The representation of an earthquake hazard can cover ground shaking, response spectra (peak spectral acceleration, peak spectral velocity, peak spectral displacement), peak ground velocity, peak ground acceleration, duration of significant shaking, time-history evaluation, and/or permanent ground deformation including fault offset.
Energy Dissipation Systems	Various structural devices that actively or passively absorb a portion structures of the intensity in order to reduce the magnitude or duration (or both) of a structure response. These devices include active mass systems, passive viscoelastic dampers, tendon devices, and base isolation, and may be incorporated into the building design.
Epicenter/Hypocenter	The point of initial rupture of a fault in an earthquake occurs deep beneath the ground surface at a location referred to as the hypocenter. The point at the ground's surface which is vertically above the hypocenter is called the epicenter. These locations may be estimated by triangulation from a number of different seismographic stations. For uniform ground conditions, ground shaking tends to decrease in intensity with increasing distance from the part fault which ruptured. Since the horizontal extent of fault rupture is short for small-magnitude (e.g. M<5.5) earthquakes, ground shaking tends to decrease with the distance of a site from the epicenter for such events. However, for larger earthquakes (M>6.5), the rupture extends for a significant distance (tens to hundreds of kilometers), making epicentral distance an unreliable estimator of ground shaking intensity.
Exposure	The number, types, qualities, and monetary values of various types of property or infrastructure, life, and environment that may be subject to an undesirable or injurious hazard event. Exposure Period The period of time over which risk is to be computed; the period of time over which a facility or population at risk is subjected to a hazard.
Fault Rupture	The differential movement of two land-masses along a fault. A concentrated, permanent deformation that occurs along the fault trace and caused by slip on the fault.
Fault Scarp	A step-like linear land form coincident with a fault trace and caused by geologically recent slip on the fault.
Fault Trace	An intersection of a fault with the ground surface; also, the line commonly plotted on geologic maps to represent a fault.

Fault Types	*Strike-slip* - a fault along which relative movement tends to occur in a horizontal direction parallel to the surface trace of the fault. The San Andreas is one of the most well known strike-slip faults, although some segments exhibit other kinds of fault behavior. The strike of the fault refers to the angle between the surface trace of the fault and north. *Dip-slip* - A fault for which relative motion occurs parallel to the direction of dip (the deviation of the fault plane from the vertical) of the fault, e.g., motion occurs perpendicular to the surface trace of the fault, at some angle with the vertical. Such faults produce scarps when fault rupture reaches the surface. *Normal* - Dip-slip movement in which the overhanging side of the fault moves downward. *Reverse* - Dip-slip movement in which the overhanging side of the fault moves upward. *Thrust* - A low-angle reverse fault. The 1987 Whittier-Narrows and 1994 Northridge earthquakes occurred on blind thrust faults - thrust faults with no surface expression. *Oblique* - A fault combining strike-slip and dip-slip motion.
Frequency	In the context of risk analysis, this refers to how often an event or outcome will occur, given a specified exposure period. For example, annual frequency is the number of events per year.
Fundamental Period	The longest period of oscillation for which a structure shows a maximum response (the reciprocal of natural frequency).
Geographic Correlation Index (GCI)	An index developed by URS Corporation [W. Graf, 7NCEE, 2002] to indicate the relative severity of risks from a particular building or site on the aggregate losses of a geographically distributed portfolio of buildings or other values at risk from earthquake hazards.
Ground Failure	A general reference to fault rupture, liquefaction, landsliding, and lateral spreading that can occur during an earthquake or other land movement causes.
Ground Shaking	The energy created by an earthquake as it radiates in waves from the earthquake source. A general term referring to the qualitative or quantitative aspects of movement of the ground surface from earthquakes. Ground shaking is produced by seismic waves that are generated by sudden slip on a fault and travel through the earth and along its surface.
Hazard	A natural physical manifestation of the earthquake peril, such as ground shaking, soil liquefaction, surface fault rupture, landslide or other ground failures, tsunami, seiche. These hazards can cause damage to man-made structures. This is an event or physical condition that has the potential to cause fatalities, injuries, property damage, infrastructure damage, agricultural loss, damage to the environment, interruption of business, or other types of harm or loss.
Irregularity (see also Regularity)	

	Describes deviations from optimal seismic structural configuration. Common irregularities are divided into vertical and plan irregularities: Plan irregularities - common cases include reentrant corners, non-symmetric distribution of mass, strength or stiffness within any given story. Vertical irregularities - abrupt changes in plan dimensions, weight, strength or stiffness from one story to another. One common vertical irregularity is the soft or weak story, often the first story, which may lead to structural collapse as earthquake ductility demands concentrate in one story, rather than distributing more uniformly over the height of the building.
Lateral Spread	The landsliding of gentle, water-saturated slopes with rapid fluid-like flow movement caused by ground shaking and liquefaction. Large elements of distributed, lateral displacement of earth materials.
Limit of Liability	(Insurance) The maximum payment amount which an insured may receive for a covered loss.
Liquefaction	When the pressure of the pore water, water located in spaces between soil particles, exceeds particle friction forces, particularly in loose sands with high water content. The soil becomes a soil-water slurry with significantly reduced shear strength. The result can be foundation bearing failure, differential settlement, lateral spreading, or floating of underground components. A process by which water-saturated soil temporarily loses shear strength due to build-up of pore pressure and acts as a fluid.
Local Seismic Hazards	The phenomena and/or expectation of an earthquake-related agent of damage, such as vibratory ground motion (i.e., ground shaking), inundation (e.g., tsunami, seiche, dam failure), various kinds of permanent ground failure (e.g., fault rupture, liquefaction), fire or hazardous materials release.
Loss	The human or financial consequences of damage, such as human death or injury, cost of repairs, or disruption of social, economic, or environmental systems.
Magnitude (M)	Magnitude (M) is the most widely used measure of the size of an earthquake (see also Richter Scale). Magnitude scales are logarithmic, found by taking the common logarithm (base 10) of the largest ground motion recorded at the arrival of the type of seismic wave being measured (a typical seismogram will display separate arrival times for a P-wave - compressional - , an S-wave - shear -, and a train of Rayleigh waves) and correcting for the distance to the earthquake's epicenter. Thus, an increase in magnitude by one unit would correspond to a tenfold increase in measured wave amplitude. Moreover, the energy released by an earthquake increases by a factor of about 30 for each unit increase in magnitude.
Mean	Arithmetic mean or average value in a statistical distribution.
Median	The value in a distribution for which 50% of the distribution values are greater or less than the median value.

Mitigation — Sustained action taken to reduce or eliminate long-term costs and risks to people and property from hazards and their effects. Mitigation distinguishes actions that have a long-term impact from those that are more closely associated with preparedness for, immediate response to, and short-term recovery from a specific event.

Model — A representation of a physical system or process intended to enhance our ability to understand, predict, or control its behavior

Modified Mercalli Intensity (MMI) (abridged)

A numerical scale ranging from I to XII which describes local ground earthquake intensity in terms of local earthquake effects. In many historical earthquakes (1900 to 1970's), few ground shaking instruments were deployed, and ground shaking maps were compiled on the basis of observed effects, using scales like the Modified Mercalli Intensity (MMI) scale. As a result, most building damage statistics are correlated to the MMI scale, since instrumental strong motion data was rare (see Peak Horizontal Acceleration).

I-V	Not significant to structures or equipment.
VI	Felt by all; many are frightened and run outdoors. Some heavy furniture moved; a few instances of fallen plaster or damaged chimneys. Damage slight.
VII	Everybody runs outdoors. Damage negligible in buildings of good design and construction; slight to moderate in well-built ordinary structures; considerable in poorly built or badly designed structures; some chimneys broken. Noticed by persons driving motorcars.
VIII	Damage slight in specially designed structures; considerable in ordinary substantial buildings, with partial collapse; great in poorly built structures. Panel walls thrown out of frame structures. Chimneys, factory stacks, columns, monuments, and walls fall. Heavy furniture overturned. Disturbs persons driving motorcars.
IX	Damage considerable in specially designed structures; well-designed frame structures thrown out of plumb; damage great in substantial buildings, with partial collapse. Buildings shifted off foundations. Ground cracked conspicuously. Underground pipes broken.
X	Some well-built wooden structures destroyed; most masonry and frame structures destroyed, along with foundations; ground badly cracked. Rails bent. Landslides considerable from river banks and steep slopes. Shifted sand and mud. Water splashed (slopped) over banks.
XI	Few, if any, (masonry) structures remain standing. Bridges destroyed. Broad fissures in ground. Underground pipelines completely out of service. Earth slumps and land dips in soft ground. Rails bent greatly.
XII	Damage total. Waves seen on ground surfaces. Lines of sight and level distorted. Objects thrown upward into the air.

Peak Ground Acceleration (PGA). — The maximum amplitude of recorded acceleration. If not specifically stated, this usually refers to horizontal accelerations.

Peak Horizontal Acceleration (PHA) — An instrumental measure of earthquake ground motion intensity, normally taken from a triaxial earthquake accelerogram as the maximum value recorded from

	either of the 2 horizontally-oriented axes. See also Peak Ground Acceleration and Acceleration.
Portfolio	Within the context of typical building seismic risk studies, this refers to a geographically-distributed set of facilities or values-at-risk.
Probability and Frequency	Frequency measures how often an event (including a natural hazard event, a state or condition of a component, or a state or condition of the system) occurs. One way to express expected frequency is the average time between occurrences or exceedances (non-exceedances) of an event. The mean annual rate of occurrence of a hazard parameter within a range of values is another way to express expected frequency of a hazard. Probabilities express the change of the event occurring or being exceeded (not exceeded) in a given unit of time. Whereas probabilities of occurrence cannot exceed 1.0, expected frequencies (for a given time unit) can exceed 1.0. For instance, expected frequencies of an auto accidents in Washington D. C. for a given year are far in excess of 1.0 even though the probability of an auto accident within a given year can only approach very closely 1.0.
Probabilistic Methods	Scientific, engineering, and financial methods of calculating severities and intensities of hazard occurrences and responses of facilities that take into account the frequency of occurrence as well as the randomness and uncertainty associated with the natural phenomena and associated structural and social response.
Probable Loss	A level of building damage from earthquake, expressed as a fraction of the building replacement value, having a stated probability of exceedance within a given exposure period. Alternatively, a level of earthquake damage having a stated return period. Probable Loss is found by considering all levels of earthquake hazard that may occur for the site in question, the building damage associated with each hazard level, and the variability of building damage within each hazard state.
Probable Maximum Loss	A term used in the past to characterize the risk of earthquake damage to buildings.
Probability of Exceedance	In the context of these risk reports, this is the probability that a specified level of damage will be surpassed within the exposure period (related to building life or investment term), given the site's earthquake environment and the facility's seismic vulnerability. The probability of exceedance and exposure period are related to the average return interval of the loss. For example, a loss level that has a 10% chance of exceedance in a 30-year exposure period may be described as having a 285-year average recurrence interval. A loss level that has a 10% chance of exceedance in a 50-year exposure period has a 475-year average recurrence interval.
Recurrence Interval	See Return Period.
Redundancy	The ability of more than one component to fail prior to system failure. In the 1997 Uniform Building Code, a Reliability/Redundancy Factor is defined as the ratio of the design story shear in the most heavily loaded element, divided by the total story shear. In this definition, a low ratio (say 0.1 or less) would imply greater

redundancy, since a single element failure would be unlikely to produce a lateral force system failure at that story.

Regularity

For optimum seismic performance, a building structure should be regular, with:
- balanced earthquake resisting elements (in strength and stiffness)
- symmetrical plan (to reduce torsion or twisting)
- uniform cross section in plan and elevation
- maximum torsional resistance
- short member spans
- direct load paths
- uniform story heights
- redundancy (no single component failure should cause system failure)

Residual Risk

The remaining risk after risk management techniques have been applied.

Response Spectrum

A plot of maximum amplitudes (acceleration, velocity or displacement) of a damped, single degree of freedom oscillator (SDOF) as the natural period of the SDOF is varied across a spectrum of engineering interest (typically, for natural periods form 0.03 to 3 or more seconds, or frequencies of 0.3 to 30+ hertz). Response spectra are tabulated or plotted for specified levels of equivalent viscous damping, typically 5%.

Return Period

The average time span between like events (such as large hazard intensities exceeding a particular intensity) at a particular site or for a specific region (also termed return period). Return period provides a clear and convenient way to express probability. For non-varying random processes, a Poissonian model provides the relationship:

$P = 1 - exp(-t/T)$

P = Probability of exceedance in exposure period, t [years]

T = Average return period [years]

For a 50-year exposure period (t), the normal useful life of a building:

Probability of Exceedance	Return Period
50%	72 years
10%	475 years
5%	950 years
2%	2,475 years

Richter Scale

A system developed by American seismologist Charles Richter in 1935 to measure the strength (or magnitude) of an earthquake, indicating the energy released in an event. Owing to limitations in the instrument used (a Wood-Anderson Seismograph) and the waves it measures, this scale has been supplement by other, more comprehensive measure of earthquake size (often moment magnitude).

Risk

The chance of adverse consequences. The combination of the expected likelihood (frequency) and the defined consequences)severity) of incidents that could result from a particular activity. The chance or probability that some defined undesirable outcome, such as injury, damage or loss, will occur during a specified exposure period.

Risk Assessment	An evaluation of the risk associated with a specific hazard. Quantitative elements of this assessment are defined in terms of probabilities and/or frequencies of occurrence and severity of consequences.
Risk Reduction Measures	Those activities that reduce overall the costs and risks associated with specific hazards.
Scenario	A type of event as defined by its natural hazard source parameters. That is, a scenario is defined by the source (the initiating event, e.g., the initial location and its severity expressed in such terms as magnitude or wind velocity), which may have many variable consequences dependent on random factors. A simulation is the assessment of these random factors to define specifically the consequences of the specific source event.
Scenario Loss	The loss from one scenario event (given specific values of the random values for other factors not defining the specific scenario). Alt., per ASTM Standard Guide E 2026-16a, a level of building damage from earthquake, expressed as a fraction of the building replacement value, associated with a stated earthquake hazard scenario. In these reports, probabilistic seismic hazards are used, and the stated scenario is based on the level of ground shaking that has a 10% chance of being exceeded in the exposure period specified by the user. Scenario Loss is further specified as the mean loss (Scenario Expected Loss or SEL) or the 90% nonexceedance loss (Scenario Upper Loss or SUL) for the stated hazard.
Seiche	A standing wave oscillation of an enclosed water body that continues, pendulum fashion, after the cessation of the originating force, which may have been either seismic or atmospheric.
Seismicity	The geographic distribution of past historic or future expected earthquakes, based upon historical or instrumental records, geologic evidence, or other means. The annual rate of occurrence of earthquakes, greater than or equal to a given magnitude, within a defined geographic area.
Seismic Zonation	Geographic delineation of areas having different potentials for hazardous effects from future earthquakes. Seismic zonation can be done at any scale—national, regional, or local. For example, California has two Seismic Zones as identified in the 1997 Uniform Building Code (UBC): Zone 3 and Zone 4. Zone 3 is the less seismically active area and is located in the northern-central valley of the State extending from the northern border to Bakersfield, plus a portion of the desert area east of the San Bernardino Mountains. This is a large portion of the State and includes Sacramento. Zone 4 is the most seismically active area and is located along the western coast of the state extending from Eureka to San Diego.
Slip	The relative displacement of formerly adjacent points on opposite sides of a fault, measured on the fault surface.
Slip Model	A kinematic model that describes the amount, distribution, and timing of slip associated with a real or postulated earthquake.

Slip Rate	The average rate of displacement at a point along a fault as determined from geodetic measurements, from offset man-made structures, or from offset geologic features whose age can be estimated.
Soil Profile	The vertical arrangement of soil horizons down to the parent material or to bedrock. Under current building codes (e.g., the Uniform Building Code, the International Building Code) and FEMA NEHRP guidelines, the soil profile may be categorized by average shear wave velocity in the upper 30m of sediments.
Source	The geologic structure that generates a particular earthquake or class of earthquakes.
Subduction Zone	An area in the earthquake lithosphere (crust) in which two tectonic plate are converging, and one plate is being thrust (subducted) under the other. Where a continental plate and an oceanic plate converge, generally the thinner oceanic plate is subducted. A subduction zone may exhibit seismicity in the form of large interplate events, in which slip occurs along the shallow dipping surface between the plates, or intraplate events (i.e., occurring within either plate, rather than along the boundary (Benioff zone) between the plates. Shallow seismicity may occur in the upper plate. Volcanic activity is usually associated with subduction zones, from the melting of the subducting plate creating buoyant magmas.
Vulnerability	The susceptibility of a building, equipment item or component to damage or loss from a specific hazard. Syn.: Fragility
Tsunami	Seismic seawave. Tsunamis may be generated from earthquakes beneath the ocean, by submarine volcanic eruptions, and by slope failures in underwater canyons. Regions of the Pacific with subduction zones (such as the Pacific Northwest, the Aleutian Islands or the area east of Japan) present tsunami hazards to the Pacific coastline. Tsunami waves may travel great distances and cause damage many hours after the causative earthquake or slide. As fast traveling deep-ocean waves approach shallow areas along the shore, they slow down and increase in height. Near-shore bathymetry and onshore topography control run-up. Structures may be damaged by inundation, impact from fast-moving water and the debris it transports.

Appendix D – Qualifications

Reza Imani, Ph.D., P.E., S.E.

Manager, Structural Engineering & Risk Mitigation, ImageCat, Inc.

Reza Imani received his Ph.D. degree in Civil (Structural) Engineering from the University at Buffalo (SUNY) in 2014 and is a registered Professional Engineer (Civil) in the State of California.

Mr. Imani has 9 years of combined research and practice experience in analysis, risk evaluation and design of structures subjected to multi-hazard loading conditions (e.g. earthquake, fire, wind) and extreme events (e.g. post-earthquake fires). Reza's research and practice experience also involve application of the Performance-Based Design method to structures under seismic and fire loads. Clients include lenders, building owners, property insurers, government agencies, issuance brokers, municipal bond rating agencies and bond insurers. Prior to joining ImageCat, Reza was a Project Engineer with Thornton Tomasetti, Inc (San Francisco Office). During his 5 years in TT, Reza was involved in various seismic design, risk assessment/evaluation and retrofit projects both within and out of the U.S. from commercial, sports, education and healthcare sectors. Reza was also a member of TT's Forensics team, using advanced analytics and engineering principles to investigate causes of failure or other concerns in behavior of structures.

Relevant Publications include:

Imani R., Ghisbain P., Ashrafi A., (2016). "Performance-based Fire Engineering: Sensitivity Analysis on Design Parameters", Published in Proceedings of the 9th International Conference on Structures in Fire (SiF 2016), Princeton University, June 2016.

Imani, R., Bruneau., (2015) "Effect of Link-beam Stiffener and Brace Flange Alignment on Inelastic Cyclic Behavior of Eccentrically Braced Frames", AISC Engineering Journal, Vol. 52, No. 2, pp 109-124.

Imani, R., Mosqueda G., Bruneau, M., (2015) "Finite Element Simulation of Concrete-Filled Double-Skin Tube Columns Subjected to Post-Earthquake Fires", ASCE Journal of Structural Engineering, Vol.141, No.12, DOI: 10.1061/(ASCE)ST.1943-541X.0001301.

Imani, R., Mosqueda G., Bruneau, M. (2014), "Experimental Study on Post-Earthquake Fire Resistance of Ductile Concrete Filled Double-Skin Tube Columns", ASCE Journal of Structural Engineering, Vol.141, No.8 DOI: 10.1061/(ASCE)ST.1943-541X.0001168.

R. Rofooei, F., Imani, R., (2011). "Evaluating the Damage in Steel MRF under Near Field Earthquakes from a Performance Based Design Viewpoint", Procedia Engineering, 14: 3325-3230, The Proceedings of the Twelfth East Asia-Pacific Conference on Structural Engineering and Construction, Kowloon, Hong Kong.

Imani, R., Bruneau, M., (2014). "Post-Earthquake Fire Resistance of Ductile Concrete Filled Double-Skin Tube Columns" Technical Report MCEER-14-0008, MCEER, Univ at Buffalo, Buffalo, NY.

W. P. Graf, M.S., P.E.

Vice President of Engineering, ImageCat, Inc.

William P. Graf, P.E. received an M.S. degree in Structural Engineering from UCLA (1981) and is a registered Professional Engineer (Civil) in the State of California.

Mr. Graf has 40 years of experience in seismic and other natural hazard and risk analyses for individual buildings, building portfolios, and lifeline structures. Bill also performs analyses of structures subject to earthquake or other loads, and develops seismic strengthening schemes. Bill is a member of the Earthquake Engineering Research Institute, and a member of the subcommittee for PML standards, ASTM E 2026 and E 2557. Clients include lenders, building owners, property insurers, government agencies, issuance brokers, municipal bond rating agencies and bond insurers. Prior to joining ImageCat, Bill was with the Los Angeles of URS Corporation for 24 years, where he managed of earthquake risk services. Bill started his engineering career with Bechtel Power Corporation, designing buildings and utility structures for 7 years.

Bill has conducted field surveys for damage to buildings and equipment from the following earthquakes: 1987 Whittier-Narrows, 1989 Loma Prieta, 1991 Sierra Madre, 1992 Desert Hot Springs, 1992 Landers/Big Bear, 1994 Northridge and 1995 Tauramena (Colombia) earthquakes.

Publications include:

Characterizing the Epistemic Uncertainty in the USGS 2014 National Seismic Hazard Mapping Project (NSHMP) (second author, with Y. Lee and Z. Hu), Bulletin of the Seismological Society of America, 2018.

“Collateral Damage from the Collapse of Tall Buildings from Earthquakes in an Urban Environment,” with Jerry Lee and Michael Eguchi, Third International Conference on Urban Disaster Reduction, 2014.

“Epistemic Uncertainty, Rival Models, and Closure,” with C.E. Taylor, R. Murnane and Y. Lee (3rd author), Natural Hazards Review, February, 2013.

"Earthquake Damage to Wood-Framed Buildings in the ShakeOut Scenario," with Hope A. Seligson, Earthquake Spectra Journal, May 2011

“Code-Oriented Damage Assessment,” EERI Spectra Journal, February, 2009 (with Jerry Lee).

“A Geographic Correlation Index For Portfolio Seismic Risk Analysis,” 7th U.S. National Conference on Earthquake Engineering, Boston, July, 2002.

“Developments In Single-site Earthquake Risk Assessment,” 6th International Conference on Seismic Zonation, Palm Springs, California, November, 2000.

"Analysis and Testing of a Flat Slab Concrete Building", Tenth World Conference on Earthquake Engineering, Madrid, Spain, July 1992 (co-authored with M. Mehrain).

"Dynamic Analysis of Tilt-up Buildings", Fourth U.S. National Conference on Earthquake Engineering, Palm Springs, California, May 1990 (co-authored with M. Mehrain).

"Lenders, Insurers, and Earthquake Loss Estimation", Fourth Annual National Earthquake Hazards Reduction Program Workshop, Puget Sound, Washington, April, 1990 (co-authored with C. Taylor and C. Tillman).

Appendix E – Seismic Design Code Objectives

Seismic Design Code Objectives for New Buildings

The provisions for seismic design of new buildings in building codes typically assume that a building will have a 50-year useful life. When these buildings were designed, the governing code in the Western United States was the Uniform Building Code, and the design motions were typically intended to capture the maximum intensity of shaking that might be expected for the site during its useful life. Redondo Beach was always in the highest seismic zone recognized by the Uniform Building Code. As ground shaking hazard models improved, the hazard level was further specified to have a 10% chance of exceedance within the 50-year assumed design life. This is equivalent to a ground shaking hazard level with a 475-year average recurrence (or a "return period" of 475 years). The objective of the seismic design code was not and is not to prevent all damage or render the building "earthquake-proof," but rather to prevent gross collapse and thereby to achieve an acceptable level of life-safety.

For "essential facilities" such as hospitals, building codes since the 1970s have required design for higher ground motions in an effort to reduce damage and ensure rapid (or immediate) resumption of essential services. After the 1971 Sylmar Earthquake, hospitals in California were designed under the supervision of the Office of the State Architect. In the early 1980s, the California Office of Statewide Health Planning and Development (OSHPD, now HCAI) took over oversight of acute-care hospital design in California. After the 1994 Northridge Earthquake caused damage to hospitals in southern California, Senate Bill 1953 was passed and administered by OSHPD, requiring the seismic retrofit of structural and nonstructural systems of older acute-care hospital buildings found to be seismically deficient. A summary of these regulations may be viewed at:

https://hcai.ca.gov/construction-finance/seismic-compliance-and-safety/program-overview/

Since January, 2008, the State of California has used the International Building Code (IBC) as the basis for seismic design of new buildings. The IBC defines the Maximum Considered Earthquake (MCE) ground motions as the hazard level associated with a 2% chance of exceedance in 50 years, or having a 2,475-year return period. Design-level motions are taken as 2/3 of the MCE level. The ground motions are further modified to result in designs for ordinary buildings that will resist the MCE with less than a 10% probability of collapse. *This design approach is viewed as having collapse probabilities of 1% or less in the 50-year typical building life.* Essential buildings are designed for higher loads, with the result that they should exhibit higher safety and damage resistance.

Seismic Evaluation and Retrofit Standards for Existing Buildings

The current national standard for seismic evaluation and retrofit of existing buildings is ASCE 41-17. It permits the selection of several levels of performance (e.g., life-safety, collapse preventions, etc.) for structural and nonstructural systems based on two hazard levels:

BSE-1E: Basic Safety Earthquake-1 for use with the Basic Performance Objective for Existing Buildings, taken as a seismic hazard with a 20% probability of exceedance in 50 years.

BSE-2E: Basic Safety Earthquake-2 for use with the Basic Performance Objective for Existing

Buildings, taken as a seismic hazard with a 5% probability of exceedance in 50 years.

ASCE 41 is cited by various jurisdictions in California for use in design to meet mandatory seismic retrofit ordinances, and is often used by Structural Engineers in voluntary seismic retrofits. A number of local building jurisdictions in California (e.g., City of Los Angeles, City of Santa Monica, etc.) have enacted mandatory seismic retrofit ordinances for older concrete buildings such as the towers at 514 North Prospect Avenue. The City of Redondo Beach has not indicated that it intends to pass such an ordinance.

Appendix F – Commercial Real Estate Lender and Owner Criteria for Seismic Risk

Seismic risk assessments for property transfer due-diligence generally follows two standards established by ASTM:

E2026-16a: Standard Guide for Seismic Risk Assessment of Buildings

E2557-16a: Standard Practice for Probable Maximum Loss (PML) Evaluations for Earthquake Due-Diligence Assessments

Seismic risk assessments are conducted by experienced Professional Engineers, working with other professionals (e.g., Geotechnical Engineers) as needed. Seismic risk assessments are typically conducted in seismically active areas (e.g., California, and western Washington and Oregon).

According to the Standards mentioned above, any seismic risk assessment as part of the due-diligence process includes:

1) A seismic hazard assessment to estimate ground motion intensities and an evaluation of site stability, considering surface fault rupture, soil liquefaction and earthquake-induced landslide.

2) A building stability assessment to assess safety and identify serious seismic deficiencies that might result in collapse under intense ground shaking in large earthquakes.

3) A building damage assessment to estimate the repair cost (as a fraction of building replacement value) under a scenario earthquake usually defined as the 475-year recurrent ground shaking and associated hazards.

Lenders and institutional purchasers typically require that both the building and the site be deemed "stable," and that the damage levels be less than some acceptable level that they designate. The acceptable level differs for various lenders and investors, as some may have be willing to take more risks. For example, some lenders require a Scenario Expected Loss (SEL) values of less than 20%. Other with lower levels of acceptable risk may require a Scenario Upper Loss (SUL) value that is less than 20%. If a building is deemed unstable or the projected damage is surpassing the mentioned limits, mitigation measures are recommended, including seismic retrofit and/or earthquake insurance. When these mitigation measure are not financially feasible, some lenders or investors may decide not to pursue the deal.

Attachment 2

The Healthy Living Campus

Evaluation of Development Strategy: Seismic Retrofitting Alternative

June 12, 2020

CAIN BROTHERS
A division of
KeyBanc Capital Markets

BCHD Beach Cities Health District

Disclaimer

Confidential

This document is for discussion purposes only and does not constitute advice of any kind, including tax, accounting, legal or regulatory advice, and Cain Brothers, a division of KeyBanc Capital Markets Inc. ("Cain Brothers") is not and does not hold itself out to be an advisor as to tax, accounting, legal or regulatory matters. We recommend that you seek independent third party legal, regulatory, accounting and tax advice regarding the contents of this document. The matters discussed herein are subject to our review and assessment from a legal, compliance, accounting policy and risk perspective, as appropriate, following our discussion with you.

This document was prepared on a confidential basis solely for discussion between you and Cain Brothers and not with a view toward public disclosure. This document may contain information provided by third parties. This document, and any oral information provided in connection herewith, shall be treated as strictly confidential and may not be reproduced, distributed or disclosed, in whole or in part, except with our prior written consent and, if applicable, the prior written consent of any third-party information provider. Cain Brothers assumes no obligation to update or otherwise revise these materials.

No representation or warranty, express or implied, is made as to the accuracy or completeness of the information contained herein and nothing contained herein is, or shall be relied upon as, a representation or warranty, whether as to the past or the future. Cain Brothers and our affiliates and our and their respective officers, employees and agents, as well as any third-party information providers, expressly disclaim any and all liability which may be based on this document and any errors therein or omissions therefrom.

This document does not constitute an offer or solicitation to sell or purchase any securities and is not a commitment by Cain Brothers or any of its affiliates to provide or arrange any financing for any transaction or to purchase any security or act as an agent or advisor or in any other capacity in connection therewith. This document does not constitute a recommendation to pursue, and is not intended to provide the sole basis for evaluating, a particular transaction, and you retain full responsibility for the decision to pursue any specific transaction discussed herein or otherwise.

"Cain Brothers, a division of KeyBanc Capital Markets Inc." is a trade name of KeyBanc Capital Markets Inc. Member NYSE/FINRA/SIPC.

KeyBanc Capital Markets Inc. and KeyBank National Association are separate but affiliated companies. Securities products and services are offered by KeyBanc Capital Markets Inc. and its licensed securities representatives. Banking products and services are offered by KeyBank National Association. Credit products are subject to credit approval.

Situational Background

- The District plans to redevelop its 11-acre campus in Redondo Beach as the Healthy Living Campus. Plans for the Healthy Living Campus include a variety of senior living, post-acute care, and ancillary health programs and services to promote wellness and active living

- The District has been working with a team of consultants for several years to evaluate ideas and concepts and create preliminary redevelopment plans

- One of the early concepts was the retrofitting of the existing 514 N Prospect Building ("514 Building"), which was evaluated by the District and determined to be financially infeasible, a conclusion which the District asks Cain Brothers to review

- One of the challenges facing the District is the need to replace approximately $3.75 million annual net cash flow from the existing 514 Building (which will be retrofitted in the seismic option) and the Lazar Ducot Note Receivable/Note Payable which will be paid off in 2024

- The District has approximately $15 million in cash and reserves which can be used to support or fund the redevelopment of the Healthy Living Campus

Key Assumptions

- The District has evaluated the costs and considerations of retrofitting the 514 Building
- The redevelopment strategy would involve:
  - Estimated $93 million construction costs ($2023)
  - 18 month construction period
  - 143,000 sf net rentable space
  - Vacating the building of current tenants
    - >$3.3 million annual revenue
    - >Monthly rental rate: $2.65/sf (Includes BOE Reimbursement)
    - >104,775 sf currently rented
- The District's evaluation concluded that retrofitting the 514 Building would not be a feasible alternative
- The District also asked CBRE/Manhattan Realty to independently evaluate the opportunity to retrofit the 514 Building
  - CBRE/Manhattan Realty utilized a discounted cash flow approach to evaluate the economics of the retrofitting strategy and came to same conclusion, that retrofitting the 514 Building was not financially feasible strategy (see page 3)

CBRE Analysis - 514 Q&D Rehabilitation Feasibility

- Based on a discounted cash flow methodology, the current value of 514 Building is $85.7 million
- Total cost of retrofitting 514 Building is approximately $119 million, including construction costs, tenant build-out credits and contingency
- If the District does not increase monthly rental rates, the retrofitting strategy produces loss of $33.4 million value
- To produce a $119 million break even value for 514 Building, the District would need to increase monthly rental rates to $5.76/sf
- However, $119 million value does not necessarily provide sufficient annual cash flow to support District activities

CBRE/Manhattan Realty Analysis (1)

	Scenario I (Market Rent)			Scenario II (Break Even)		
Rent	143,371	$4.50	$7,742,029	143,371	$5.76	$9,909,797
Vacancy	15%		$1,161,304	15%		$1,486,469
EGI			$6,580,724			$8,423,327
Expenses	143,371	$13.00	$1,863,822	143,371	$13.00	$1,863,822
NOI			$4,716,903			$6,559,505
Cap Rate			5.50%			5.50%
Stabilized Value			$85,761,866			$119,263,735
Less Rehab			$93,000,000			$93,000,000
Less Tenant Buildout	143,371	$150.00	$21,505,635	143,371	$150.00	$21,505,635
Contingency/Other	$93,000,000	5%	$4,650,000	$93,000,000	5%	$4,650,000
Pre-Absorption Value			($33,393,769)			$108,100

Notes:

- The above does not include any costs associated with lease-up, i.e., downtime, commissions, legal, etc.
- Lease-up could be starting from zero as previous tenants might not come back after relocating to allow the retrofit.
- The depth of the market demand is a concern.
- There doesn't seem to be any discount compared to new construction.
- New construction could be sized to match expected demand.
- Construction of a new MOB could potentially be timed to capture/accommodate the tenant relocations from 514 and possibly 510 as well (which is starting to appear more imminent).

(1) Source: CBRE/Manhattan Realty Analysis dated 03/13/2020

Cain Brothers' Analysis

- Cain Brothers also independently evaluated the financial consequences of retrofitting the 514 Building by analyzing the annual cash flow and monthly rental rates/sf
- Key assumptions include:
  - $93 million retrofitting costs are funded with long-term, fixed rate tax-exempt bonds
  - Resulting in annual debt service of approximately $5.8 million
  - Community Health & Fitness program would be relocated offsite during retrofitting construction
  - District cash reserves would be used to:
    - >Fund initial costs to set up offsite Community Health & Fitness space
    - >Ongoing incremental "off-site" costs of operating Community Health & Fitness space
    - >Replace $2.5 million ongoing net annual rental income from 514 Building
    - >Replace $437K ongoing net cash flow related to Lazar Ducot Note Receivable/Note Payable
- Conclusion:
  - The District would need to charge a minimum of $6.11 – $7.47/sf (depending on how much space in the retrofitted building will be occupied by District activities) for monthly rental rates to fund debt service and support other District programs currently subsidized by the rental activity of 514 Building
  - The District would use $9.0 - $10.4 million of its cash reserves to fund this strategy

Analysis of BCHD Projected Cash Flow and Targeted 514 Revenue

	Budget 6/30/2020	Adjustments		Stabilized Operations
Revenues				
Health & Fitness	2,994,398	No change	-	2,994,398
Property Tax	3,930,505	No change	-	3,930,505
Property Lease	4,812,639	Eliminate Building 514	(3,307,428)	1,505,211
		Termination of Lazar Ducot N/R	(1,157,659)	(1,157,659)
Interest	965,861	No change	-	965,861
Limited Partnership	2,162,000	No change	-	2,162,000
Donations & Other	52,315	No change	-	52,315
Total Revenues	**14,917,718**			**10,452,631**
Expenses				
Health & Fitness	3,199,020	No change		3,199,020
Life	4,228,915	No change		4,228,915
Volunteer,	2,065,434	No change		2,065,434
Property	2,410,343	Debt service on retrofitting costs	5,737,000	8,147,343
Support Services	2,295,593	Ducot Notes Payable	(720,000)	1,575,593
Total Expenses	**14,199,305**			**19,216,305**
Operating Income	**718,413**			**(8,763,674)**

Cash Flow Gap (Projected compared to Budget)		9,482,087
NIADS Target with DSCR =	1.30	7,458,100
Revenue Gap		10,484,774
Building 514 Rentable Space After Retrofit		143,000
Target Annual Rent/sf		$ 73.32
Target Monthly Rent/sf		$ 6.11
Current Monthly Rent/sf (Includes BOE Reimbursement)		$ 2.65

Analysis of BCHD Cash Reserves

The District would use between $9.0 - $10.4 million of its cash reserves to replace the 514 Building net cash flow that currently supports other District programs and to fund relocations costs associated with Community Health & Fitness program

	Average	Conservative	Aggressive
Cash Reserves - 12/31/2019	15,000,000	15,000,000	15,000,000
Less 514 Revenue			
Annual Rent (not including BOE)	2,500,000	2,500,000	2,500,000
Years of Demolition	3	3	3
Total 514 Subsidy	7,500,000	7,500,000	7,500,000
Less CHF Relocation Costs			
Initial Set up	360,000	460,000	260,000
Annual Subsidy for Offsite Rent	600,000	800,000	400,000
Years of Relocation	3	3	3
Total Annual CHF Subsidy	1,800,000	2,400,000	1,200,000
Ending Cash Reserves	5,340,000	4,640,000	6,040,000

Notes:

- Aggressive = Lower initial set up cost of CHF offsite location and lower annual offsite location rent subsidy
- Conservative = Higher initial set up cost of CHF offsite location and higher annual offsite location rent subsidy
- Additional funds from cash reserves may be needed to pay for offsite rent for Administrative offices currently at 1200 Del Amo Blvd

Analysis of Retrofitted 514 Building Rental Rates

The targeted monthly rental rate for 514 Building third party tenants depends on the amount of space used by the District for Community Health & Fitness, Community Services, and/or Administrative Space. The more space occupied by the District, the higher the monthly rental rates for third party tenants.

Gross Building Space (sf)	160,000
Net Rentable Space (sf)	143,000
Community Health and Fitness (sf)	12,000
Community Services (sf)	6,000
Administrative Space (sf)	8,000
Targeted 514 Annual Revenue	$ 10,484,774

Net Rentable Space (sf)	Community Health and Fitness (sf)	Community Services (sf)	Administrative Space (sf)	Third Party Tenants (sf)	Third Party Monthly Rent/sf
143,000	12,000	6,000	8,000	117,000	$ 7.47
143,000	12,000	6,000		125,000	$ 6.99
143,000	12,000			131,000	$ 6.67
143,000				143,000	$ 6.11

Attachment 3

RESOLUTION NO. 2010-10-PCR-035

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH APPROVING AN EXEMPTION DECLARATION AND GRANTING THE REQUESTS FOR AMENDMENTS TO AN EXISTING CONDITIONAL USE PERMIT AND EXISTING PLANNING COMMISSION DESIGN REVIEW TO ALLOW THE EXPANSION OF A RESIDENTIAL CARE FACILITY WITHIN AN EXISTING MEDICAL BUILDING ON PROPERTY LOCATED WITHIN A PUBLIC-COMMUNITY FACILITY (P-CF) ZONE AT 514 NORTH PROSPECT AVENUE (CASE NO. 2010-10-PC-023)

WHEREAS, an application was filed on behalf of the owner of the property located at 514 North Prospect Avenue for approval of an Exemption Declaration and consideration of amendments to an existing Conditional Use Permit and existing Planning Commission Design Review to allow the expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) zone; and

WHEREAS, notice of the time and place of the public hearing where the Exemption Declaration and the applications would be considered was given pursuant to State law and local ordinances by publication in the Beach Reporter, by posting the subject property, and by mailing notices to property owners within 300 feet of the exterior boundaries of the subject property; and

B-66

WHEREAS, the Planning Commission of the City of Redondo Beach has considered evidence presented by the applicant, the Planning Department, and other interested parties at the public hearing held on the 21st day of October, 2010, with respect thereto.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY FIND:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Conditional Use Permit is in accord with the criteria set forth therein for the following reasons:

   a) The proposed expansion of the assisted residential care facility for seniors is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed expansion of the assisted residential care facility for seniors.

c) The proposed expansion of the assisted residential care facility for seniors has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

d) The expansion of the assisted residential care facility for seniors is consistent with the Comprehensive General Plan of the City.

2. In accordance with Section 10-2.2502(B) of the Redondo Beach Municipal Code, the applicant's request for Planning Commission Design Review is consistent with the criteria set forth therein for the following reasons:

   a) The project, which consists primarily of the interior remodel of an existing structure considers the impact and needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

   b) The project, which consists primarily of the interior remodel of an existing structure, includes the installation of new landscaping and irrigation where a sidewalk was previously located.

   c) The project, which consists primarily of the interior remodel of an existing structure, is harmonious and consistent within the existing architectural style of the structure in so far as it includes the replacement of a set of exterior doors with new windows on the west-facing elevation.

   d) The project, which consists primarily of the interior remodel of an existing structure with the exception of the replacement of a set of exterior doors with new windows on the west-facing elevation, has no impacts on the neighborhood nor the scale and bulk of surrounding properties.

3. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

4. Pursuant to Chapter 3, Title 10 of the Redondo Beach Municipal Code, the project is exempt from the preparation of environmental documents pursuant to Section 15301 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA).

5. The Planning Commission hereby finds that the proposed project will have no impact on Fish and Game resources pursuant to Section 21089(b) of the Public Resources Code.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. That based on the above findings, the Planning Commission does hereby approve the Exemption Declaration and grant the amendments to the existing Conditional Use Permit and existing Planning Commission Design Review pursuant to the plans and applications considered by the Planning Commission at its meeting of the 21st day of October, 2010.

Section 2. This permit shall be void in the event that the applicant does not comply with the following conditions:

1. That the approval granted herein is for the conversion of space and use on the first floor of the south tower of the most centrally located structure, known as 514 N. Prospect Avenue, from a medical diagnostic use and a physical therapy use to an assisted residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on October 21, 2010.

2. That the conversion of the first floor of the structure to an expanded residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of October 21, 2010.

3. That a landscaping plan be developed to re-landscape the area directly in front of the building where the exterior ingress/egress doors are to be removed and replaced with windows.

4. That the Planning Department shall be authorized to approve minor changes to the conversion of the first floor of the structure of the new residential care facility for seniors.

5. That the conversion of the first floor of the structure to an expanded residential care facility for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

6. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

7. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

8. That the conditions of Planning Commission Resolutions 2006-05-PCR-020 and 2007-09-PCR-033 shall remain in full force and effect except as amended herein.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Section 3. That the approved amendments to the existing Conditional Use Permit and existing Planning Commission Design Review shall become null and void if not vested within 36 months after the Planning Commission's approval of the project.

Section 4. That, prior to seeking judicial review of this resolution, the applicant is required to appeal to the City Council. The applicant has ten days from the date of adoption of this resolution in which to file the appeal.

FINALLY RESOLVED, that the Planning Commission forward a copy of this resolution to the City Council so the Council will be informed of the action of the Planning Commission.

PASSED, APPROVED AND ADOPTED this 21st day of October, 2010.

Douglas Kim, Chair
Planning Commission
City of Redondo Beach

ATTEST:

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF REDONDO BEACH)

I, Aaron Jones, Planning Director of the City of Redondo Beach, California, do hereby certify that the foregoing Resolution No. 2010-10-PCR-035 was duly passed, approved and adopted by the Planning Commission of the City of Redondo Beach, California, at a regular meeting of said Planning Commission held on the 21st day of October, 2010, by the following roll call vote:

AYES: Chair Kim, Commissioners Benning, Garten, Zager, Sanchez, and Parsons

NOES: None

ABSENT: Commissioner Biro

Aaron Jones, Planning Director

APPROVED AS TO FORM:

City Attorney's Office

Administrative Report

Planning Commission Hearing Date: October 21, 2010

AGENDA ITEM: 12 (PUBLIC HEARINGS)

PROJECT LOCATION: 514 NORTH PROSPECT AVENUE

APPLICATION TYPE: EXEMPTION DECLARATION, AMENDMENTS TO A CONDITIONAL USE PERMIT AND PLANNING COMMISION DESIGN REVIEW

CASE NUMBER: 2010-10-PC-023

APPLICANT'S NAME: SILVERADO SENIOR LIVING

APPLICANT'S REQUEST AS ADVERTISED:

Consideration of an Exemption Declaration and amendments to an existing Conditional Use Permit and Planning Commission Design Review to allow an expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) Zone.

DEPARTMENT'S RECOMMENDATION:

The Planning Department recommends that the Planning Commission make the findings as set forth in the staff report, adopt the Exemption Declaration and approve amendments to the Conditional Use Permit and Planning Commission Design Review, subject to the plans and applications submitted, and the conditions below.

DEPARTMENT'S ANALYSIS OF REQUEST:

BACKGROUND/EXISTING CONDITIONS:

The subject property is developed with a 37,000 square foot facility, built in 1976, that consists of three separate buildings (510, 514 & 520 Prospect) surrounded by various parking structures and parking lots. Access to the site is provided via three (3) driveways off of North Prospect Avenue. The centrally located driveway is the public entrance, while the driveway to the south is a designated staff entrance.

The facility is occupied by a variety of health care providers including an Imaging Facility, Ob/Gyn-Infertility Office, Massage-acupuncture-hypnotherapy Services, Pulmonary/Internal Medicine, Family Practice, Internal Medicine, Dermatology, Cardiology, Ophthalmology and Physical Therapy Services, a Surgery Center, a Gym

offering yoga and pilates, a Lab, a Dialysis Center, Cancer Care, the BCHD offices, Urgent Care and a pharmacy.

The subject property is surrounded by a variety of uses including single-family residences to the west, south and east, and a shopping center and service station to the north.

On May 18, 2006, the Planning Commission approved a Conditional Use Permit (see attached Staff Report and Resolution No. 2006-05-PCR-020) to allow the reconfiguration of the 2nd, 3rd and 4th floors of the medical facility with acute care beds to residential care beds for the elderly. The new facility was designed specifically for seniors with Alzheimer's and is operated by a company known as Silverado Senior Living. The total project area is 27,300 square feet in size with 9,100 square feet of space on each floor consisting of the small residential units and common areas: a living area; dining areas; an activity area; spa; and other miscellaneous areas. There is also a 3,780 square foot outdoor garden located on a terrace beside the south tower cafeteria.

On September 20, 2007,the Planning Commission also approved a Planning Commission Design Review for the facility (see attached Staff Report and Resolution No. 2007-09-PCR-033) to allow for various exterior façade modifications including the addition of new balconies/decks adjacent to each of the three floors, two (2) new glass canopies and other changes in the window and door openings and formations.

The Silverado facility has been operational with 88 beds since March 2009.

CURRENT REQUEST:

The applicant is seeking approval to amend the existing Conditional Use Permit and Planning Commission Design Review to allow the expansion of the Silverado Senior Living facility, located on the 2nd, 3rd and 4th floors of the south tower of 514 N. Prospect, to the first floor. The first floor area under consideration is currently occupied by an imaging center and a cardio-pulmonary rehabilitation center.

The first floor expansion consists of the interior remodel of 10,735 square feet of gross floor area. 4,720 square feet of the area will be used to construct 16, two (2) bedroom units. The remaining area will be remodeled to create residents' activity areas, a dining area, restrooms, administrative offices and other support uses. Once the first floor remodel is complete it will connect to the rest of the facility by way of stairs or an elevator located in the lobby at the north end of each of the four floors.

Currently there are west-facing doors on the first floor that provide exterior ingress and egress to the first floor area. These doors, which are set in approximately eight (8) feet from the exterior wall, are to be removed and replaced with windows that will be flush with the exterior wall. The new windows will match the existing windows along the west-facing elevation. In addition, the small section of sidewalk that currently leads to the

doors will be removed and replaced with new landscaping to match the existing landscaping.

EVALUATION OF REQUEST:

The proposed project requires the approval of an amendment to the existing Conditional Use Permit and the Planning Commission Design Review.

CONDITIONAL USE PERMIT

The purpose of a Conditional Use Permit is to ensure that the site is appropriate for the proposed use, that the site has adequate access to a public street that can accommodate the traffic generated by the use, that the proposed use will not have an adverse effect on the surrounding neighborhood and that the project is consistent with the City's General Plan.

The original project, as approved in 2006, is located entirely within the 514 N. Prospect structure, with the exception of a small outdoor garden area located on a south-facing terrace and the enclosed balconies located off of the 2nd, 3rd and 4th floors. The proposed expansion will also be located within the footprint of the 514 N. Prospect structure with the exception of an 8 foot by 8 foot area, 64 square feet in total that will be gained by removing ingress/egress doors and replacing them with windows flush with the exterior windows.

The following information was taken into consideration in approving the ratio of one parking space for every three (3) beds when the project was first approved in 2006.

a. All the residents of Silverado Senior Living have Alzheimer's or Dementia and are no longer self-mobile or can no longer drive an automobile.

b. Many of the employees utilize ridesharing, bicycling, or public transit for their commute due to the close proximity to their homes.

c. Families and visitors of the Silverado residents usually visit after commuting hours in the evening. Families typically come to see their loved ones on the weekends and after work.

d. Silverado provides a community shuttle that transports their residents, their families and employees for visits, special events, shopping and other excursions, greatly reducing the number of trips made from the site.

The operators of the facility have found the above considerations to be true. The current facility has been operating since March, 2009 with no impacts on on-site parking. Therefore, the conversion of 10,735 square feet of gross floor area from physical rehabilitation uses, which requires one parking space for every 300 square feet or a total of 36 parking spaces, to an assisted residential care use with 32 beds,

which requires one parking space for every three (3) beds or 11 parking spaces, will result in a reduction in the demand for on-site parking.

In 2006, staff completed Initial Environmental Study No. 2006-03-IES-MND-005. Among other things the study examined the trip generation potential for the proposed use. The trip generation study, based on information provided by the Institute of Transportation Engineers (ITE) Trip Generation Report, 7th Edition, indicated that the assisted residential care use would generate considerably less traffic, only about 20% as much, as the previous use. Information contained in the Institute of Transportation Engineers (ITE) Trip Generation Report, 8th Edition confirms that the proposed use will generate less traffic than the existing use. Representatives of Silverado and BCHD indicate that there have not been any negative impacts on traffic circulation as a result of the new facility. Therefore, the conversion of 10,735 square feet of gross floor area from a medical diagnostic use and a physical rehabilitation use to an assisted residential care use with 32 beds will result in a decrease in the average vehicle trips to and from the subject property thereby reducing the current demands on the on-site and off-site traffic circulation systems.

According to representatives of BCHD, the operation of the existing facility has not had an adverse effect on any of the other uses on the subject property. It is logical to conclude, therefore, that a small expansion of the existing facility will not cause negative impacts on the other uses on the campus.

The expansion of the existing assisted residential care facility is consistent with the City's General Plan which states that it is the goal of the City to provide the types and mix of land uses necessary to serve the needs of existing and future residents. This site is designated "P" Public in the General Plan. Policy 1.46.1 of the General Plan permits "human health" and "human services" on properties designated "P" Public. Given the aging demographics of our population it is not surprising that this facility is looking to expand and it is likely that more of these facilities will be needed in the near future.

PLANNING COMMISION DESIGN REVIEW

The purpose of 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. Thoughtful consideration of urban design helps preserve or sometimes improves property values, prevents the blight and deterioration of neighborhoods, promotes sound land use, encourages design excellence, and protects the overall health, safety, and welfare of the City.

In this instance, the proposed expansion to the existing assisted residential care facility is primarily an interior remodel and has minimal impact on the architecture of the existing structure. The removal of a set of exterior doors on the west-facing elevation will result in a small, 64 square foot, expansion of the interior space. As per the plans, the doors are to be replaced by windows that will be flush with the exterior wall and will

match the existing windows on that elevation. The existing sidewalk that leads to the doors will be removed and replaced with landscaping and irrigation. The applicant will be required to provide landscape plans during the plan check phase to show that appropriate plantings will be installed in that area.

ENVIRONMENTAL STATUS:

The project is Categorically Exempt pursuant to section 15301 of the California Environmental Quality Act (CEQA).

FINDINGS:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Condition Use Permit is in accord with the criteria set forth therein for the following reasons:

   a) The proposed expansion of the assisted residential care facility for seniors is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

   b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed expansion of the assisted residential care facility for seniors.

   c) The proposed expansion of the assisted residential care facility for seniors has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

   d) The expansion of the assisted residential care facility for seniors is consistent with the Comprehensive General Plan of the City.

2. In accordance with Section 10-2.2502(B) of the Redondo Beach Municipal Code, the applicant's request for Planning Commission Design Review is consistent with the criteria set forth therein for the following reasons:

   a) The project, which consists primarily of the interior remodel of an existing structure considers the impact and needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

b) The project, which consists primarily of the interior remodel of an existing structure, includes the installation new landscaping and irrigation where a sidewalk was previously located.

c) The project, which consists primarily of the interior remodel of an existing structure, is harmonious and consistent within the existing architectural style of the structure in so far as it includes the replacement of a set of exterior doors with new windows on the west-facing elevation.

d) The project, which consists primarily of the interior remodel of an existing structure with the exception of the replacement of a set of exterior doors with new windows on the west-facing elevation, has no impacts on the neighborhood nor the scale and bulk of surrounding properties.

3. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

4. Pursuant to Chapter 3, Title 10 of the Redondo Beach Municipal Code, the project is exempt from the preparation of environmental documents pursuant to Section 15301 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA).

5. The Planning Commission hereby finds that the proposed project will have no impact on Fish and Game resources pursuant to Section 21089(b) of the Public Resources Code.

CONDITIONS:

1. That the approval granted herein is for the conversion of space and use on the first floor of the south tower of the most centrally located structure, known as 514 N. Prospect Avenue, from a medical diagnostic use and a physical therapy use to an assisted residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on October 21, 2010.

2. That the conversion of the first floor of structure to an expanded residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of October 21, 2010.

3. That a landscaping plan be developed to re-landscape the area directly in front of the building where the exterior ingress/egress doors are to be removed and replaced with windows.

4. That the Planning Department shall be authorized to approve minor changes to the conversion of the first floor of structure the new residential care facility for seniors.

5. That the conversion of the first floor of the structure to an expanded residential care facility for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

6. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

7. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

8. That the conditions of Planning Commission Resolutions 2006-05-PCR-020 and 2007-09-PCR-033 shall remain in full force and effect except as amended herein.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Prepared by:

Anita Kroeger
Associate Planner

Approved by:

Aaron Jones
Planning Director

attachments

- Planning Commission Staff Report, May 18, 2006
- Resolution No. 2006-05-PCR-020
- Planning Commission Staff Report, September 20, 2007
- Resolution No. 2007-09-PCR-033

CITY OF REDONDO BEACH

EXEMPTION DECLARATION
PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

DATE: October 21, 2010

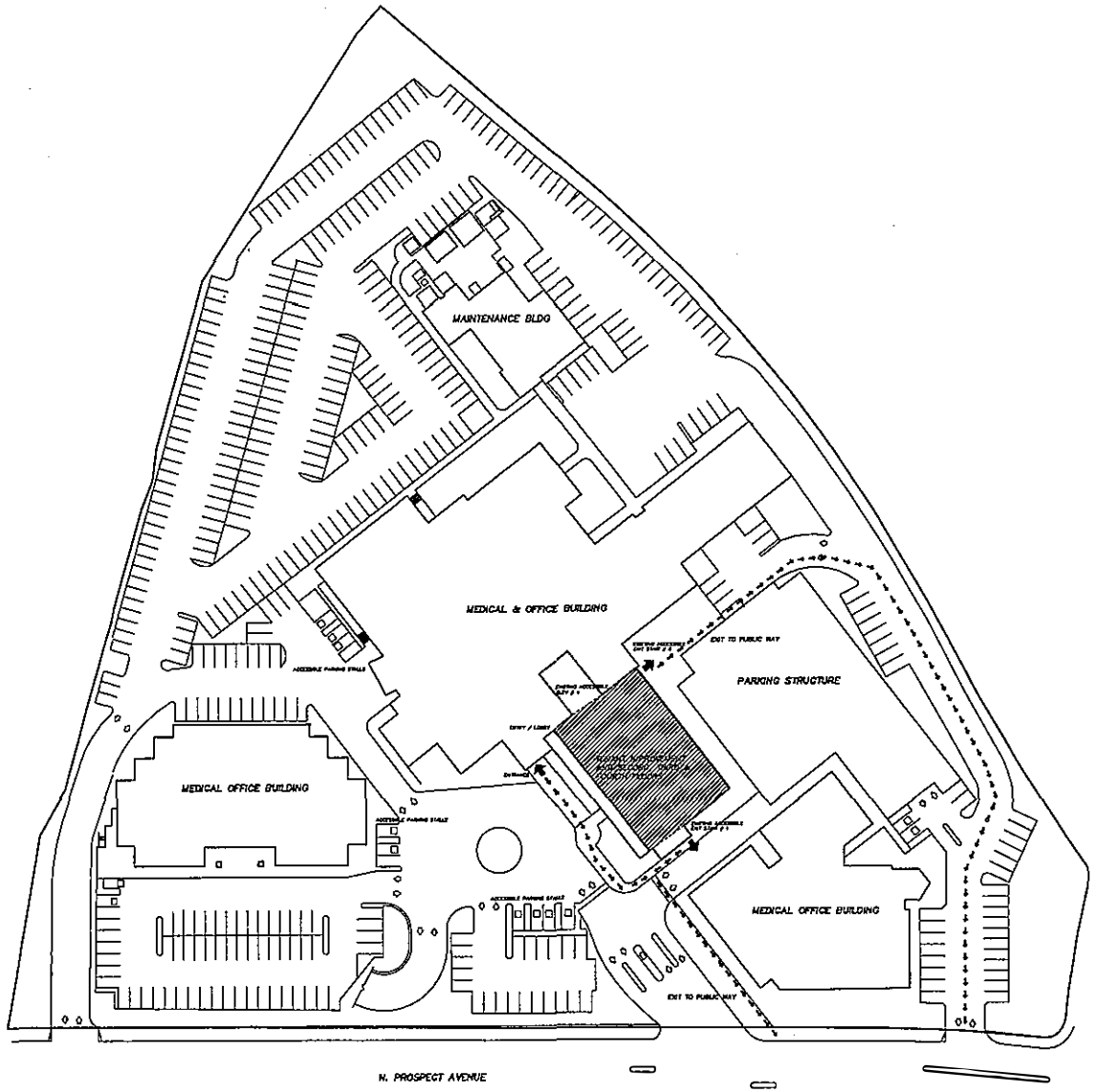
PROJECT ADDRESS: 514 North Prospect Avenue

PROPOSED PROJECT: Consideration of an Exemption Declaration for the approval of amendments to an existing Conditional Use Permit and Planning Commission Design Review to allow an expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) Zone.

In accordance with Chapter 3, Title 10, Section 10-3.301(a) of the Redondo Beach Municipal Code, the above-referenced project is Categorically Exempt from the preparation of environmental review documents pursuant to:

> Section 15301 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA) states, in part, that projects involving minor alteration of existing facilities with negligible or no expansion are categorically exempt from the preparation of environmental documents. This finding is supported by the fact that the proposed project consists of the expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) Zone.

Anita Kroeger
Associate Planner



SITE PLAN NOTES

REFER TO ADDITIONAL NOTATIONS ON SHEETS A-1.0 & A-1.1

SITE PLAN (FIRST FLOOR) 1/32" = 1'-0" 1

KEY PLAN

IRWIN PANCAKE ARCHITECTS

ARCHITECTURE
PLANNING
CONSULTING

343 FISCHER AVENUE
SUITE B-D
COSTA MESA
CALIFORNIA, 92626
TEL 714-556-3724
FAX 714-556-1572
www.irwin-pancake.com

SILVERADO SENIOR LIVING
SOUTH BAY
415 N PROSPECT AVE
REDONDO BEACH CA

SITE PLAN

A-0.1

Attachment 4

RESOLUTION NO. 2006-05-PCR-020

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH APPROVING A NEGATIVE DECLARATION AND GRANTING THE REQUESTS FOR A CONDITIONAL USE PERMIT AND PLANNING COMMISSION DESIGN REVIEW TO PERMIT THE CONVERSION OF THREE FLOORS OF AN EXISTING MEDICAL FACILITY TO A RESIDENTIAL CARE FACILITY (ASSISTED LIVING) WITH 84 BEDS ON PROPERTY LOCATED WITHIN A PUBLIC-COMMUNITY FACILITY (P-CF) ZONE AT 514 NORTH PROSPECT AVENUE (CASE NO. 2006-04-PC-017)

WHEREAS, an application was filed on behalf of the owner of the property located at 514 North Prospect Avenue for approval of a Negative Declaration, consideration of a Conditional Use Permit and request for Planning Commission Design Review to permit the conversion of three floors of an existing medical facility to a residential care facility (assisted living) with 84 beds on property located within a Public-Community Facility (P-CF) zone; and

WHEREAS, notice of the time and place of the public hearing where the Negative Declaration and the applications would be considered was given pursuant to State law and local ordinances by publication in the Easy Reader, by posting the subject property, and by mailing notices to property owners within 300 feet of the exterior boundaries of the subject property; and

WHEREAS, the Planning Commission of the City of Redondo Beach has considered evidence presented by the applicant, the Planning Department, and other interested parties at the public hearing held on the 18th day of May, 2006, with respect thereto.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY FIND:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Condition Use Permit is in accord with the criteria set forth therein for the following reasons:

    a) The proposed use is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed use.

c) The proposed use has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

d) The project is consistent with the Comprehensive General Plan of the City.

2. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

3. The Planning Commission hereby finds that Negative Declaration No. 2006-02-IES-ND-005 has been prepared and circulated in compliance with the provisions of the California Environmental Quality Act (CEQA), and the procedures set forth in the ordinances of the City of Redondo Beach.

4. The Planning Commission hereby finds and determines that the proposed project will not have a significant effect on the environment, subject to the modifications of the design review and conditions of approval.

5. The Planning Commission hereby finds that the proposed project will have a "de minimis" impact on fish and game resources pursuant to Section 21089(b) of the Public Resources Code.

6. The Planning Commission further finds that in reviewing the Negative Declaration it has exercised its own independent judgment.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. That based on the above findings, the Planning Commission does hereby approve the Negative Declaration and grant the Conditional Use Permit and Planning Commission Design Review pursuant to the plans and applications considered by the Planning Commission at its meeting of the 18th day of May, 2006.

Section 2. This permit shall be void in the event that the applicant does not comply with the following conditions:

1. That the approval granted herein is for the conversion of space and use on the second, third and fourth floors of the south tower of the most centrally located building (514 N. Prospect Avenue) from acute care facilities to an assisted living residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on May 18, 2006.

2. That the conversion of the second, third and fourth floors of the hospital building to a new residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of May 18, 2006.

3. That long-term parking spaces be designated for residents to store their vehicles as required.

4. That a landscaping plan be developed to re-landscape the area directly in front of the building and adjacent to and within the enclosed patio/outdoor garden, to be created for the residential care facility patients in conformance with water-conservation requirements.

5. That the Planning Department shall be authorized to approve minor changes to the conversion of the second, third and fourth floors of hospital building to new residential care for seniors.

6. That the conversion of the second, third and fourth floors of hospital building to the new residential care for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

7. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

8. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Section 3. That the requests for a Conditional Use Permit and Planning Commission Design Review shall become null and void if not vested within 36 months after the Planning Commission's approval of the project.

Section 4. That, prior to seeking judicial review of this resolution, the applicant is required to appeal to the City Council. The applicant has ten days from the date of adoption of this resolution in which to file the appeal.

FINALLY RESOLVED, that the Planning Commission forward a copy of this resolution to the City Council so the Council will be informed of the action of the Planning Commission.

PASSED, APPROVED AND ADOPTED this 18th day of May, 2006.

Lenore Bloss, Vice-Chair
Planning Commission
City of Redondo Beach

ATTEST:

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF REDONDO BEACH)

I, Randy Berler, Planning Director of the City of Redondo Beach, California, do hereby certify that the foregoing Resolution No. 2006-05-PCR-020 was duly passed, approved and adopted by the Planning Commission of the City of Redondo Beach, California, at a regular meeting of said Planning Commission held on the 18th day of May, 2006, by the following roll call vote:

AYES: Vice-Chair Bloss, Commissioners Garten, Kim, Kilroy, and Houterman

NOES: None

ABSENT: Commissioner Zager

Randy Berler, Planning Director

APPROVED AS TO FORM:

Assistant City Attorney

Administrative Report

Planning Commission Hearing Date: **May 18, 2006**

AGENDA ITEM: 10 (PUBLIC HEARINGS)

PROJECT LOCATION: 514 NORTH PROSPECT AVENUE

APPLICATION TYPE: CONDITIONAL USE PERMIT, PLANNING COMMISSION DESIGN REVIEW AND NEGATIVE DECLARATION

CASE NUMBER: 2006-04-PC-017

APPLICANT'S NAME: SILVERADO SENIOR LIVING

APPLICANT'S REQUEST AS ADVERTISED:

Consideration of a Negative Declaration, Planning Commission Design Review and Conditional Use Permit to allow the conversion of three floors of an existing medical facility to a residential care facility (assisted living) with 84 beds, on property located within the Public-Community Facility (P-CF) zone.

DEPARTMENT'S RECOMMENDATION:

The Planning Department recommends that the Planning Commission make the findings as set forth in the staff report, adopt the Negative Declaration and approve the Planning Commission Design Review and Conditional Use Permit, subject to the plans and applications submitted, and the conditions below.

DEPARTMENT'S ANALYSIS OF REQUEST:

BACKGROUND/EXISTING CONDITIONS:

The subject property is developed with a 37,000 square foot facility, built in 1976, that consists of three separate buildings surrounded by various parking structures and parking lots. Access to the site is provided via two driveways off of North Prospect Avenue. The centrally located driveway is the public entrance, while the driveway to the south is a designated staff entrance.

The facility is occupied by a variety of health care providers including the Little Company of Mary Women's Wellness Center and Rehab Center, Beach Cities Ambulatory Care, Beach Cities Health District Center for Health & Fitness, an Urgent Care Center, a Dialysis Center and an Imaging Facility.

The subject property is surrounded by a variety of uses including single-family residences to the west, south and east, and a shopping center and service station to the north.

CURRENT REQUEST:

The applicant is seeking approval to remodel and establish new uses on the second, third and fourth floors of the south tower of the most centrally located structure (514 N. Prospect Avenue). More specifically, the proposed project is to convert areas previously used for acute care nursing units to an assisted living residential care facility for seniors. The project includes the reconfiguration of the 2nd, 3rd and 4th floors from 77 acute care beds to 84 residential care beds for the elderly.

The total project area is 27,300 square feet with 9,100 square on each of the 2nd, 3rd, and 4th floors of the south tower, which are to be converted into small residential units and common areas including a living area, dining areas, activity area, spa and other miscellaneous areas. The units will consist of six (6) one-bed units, 275 square feet in size, and thirty-nine (39) two-bed units, 300 square feet in size.

A 3,780 square outdoor garden is to be created next to the south tower cafeteria. The secured garden area will only be accessible from the inside of the facility. The area will be completely landscaped and will feature a curved pathway and a small seating area.

Exterior modifications will occur on the north side only. The modifications include new balconies to be installed on the north side of each of the three floors with a trellis over the fourth floor balcony, the removal of some of the windows, the installation of double doors that will lead onto the balconies and the construction of a new quarter glass canopy. All exterior colors and materials are designed to match the existing colors and materials.

A sign advertising the facility is to be installed over the fourth floor windows directly east of the new balconies.

It should be noted that a similar request for a 57-bed assisted living facility was approved by the Planning Commission on April 21, 2005. However, the plans with that operator did not work out.

EVALUATION OF REQUEST:

The proposed project requires the approval of a Conditional Use Permit. The purpose of a Conditional Use Permit is to ensure that the site for the proposed use is appropriate for that specific use, that the site has adequate access to a public street that can accommodate the traffic generated by the use, that the proposed use will not have an adverse effect on the surrounding neighborhood and that the project is consistent with the City's General Plan.

The subject property and the improvements located on the site are adequate to accommodate the proposed assisted living residential care facility. The facility will be located entirely within an existing structure, with the exception of a small outdoor garden area, and will require interior modifications to the floor plans and some minor, cosmetic exterior modifications. The proposed project will not affect any existing conditions on the site such as building setbacks, parking, circulation, landscaping or other features.

The site has access to a public street that is adequate in width to carry the traffic generated by the proposed use and other existing uses on the subject property. As is stated in the environmental document, Initial Environmental Study No. 2006-02-IES-ND-005, the proposed use is expected to generate considerably less traffic (230 daily trips) than the former hospital use (909 daily trips). These calculations are based on trip generation figures contained in the Institute of Traffic Engineers, Trip Generation Manual (7th Edition, 2003), which indicates that residential care facilities generate 2.74 round trips per bed versus 11.81 roundtrips per hospital bed. There is more than sufficient on-site parking. A very limited number of long-term parking spaces may need to be designated for the few residents who own cars. Most of the residents will not own cars.

The project will not have an adverse effect on the surrounding areas because the proposed use will not generate any additional traffic or parking demands, noise or other undesirable impacts. The proposed facility will provide a much needed residential care facility for the elderly who require living assistance and who wish to remain living in the South Bay area.

The approval of an assisted living residential care facility for the seniors is consistent with the City's General Plan which states that it is the goal of the City to provide the types and mix of land uses necessary to serve the needs of the existing and future residents. This site is designated "P" Public in the General Plan. Policy 1.46.1 of the General Plan permits "human health" and "human services" is areas designated "P". Given the aging demographics of our population it is likely that more of these facilities will be needed in the near future.

ENVIRONMENTAL STATUS:

Pursuant to the California Environmental Quality Act (CEQA), staff prepared an Initial Environmental Study (2006-02-IES-ND-005) to evaluate the potential environmental impacts attributable to the project. The IES found that the proposed project could not have a significant adverse effect on the environment and as such Negative Declaration No. 2006-02-IES-ND-005 has been prepared.

FINDINGS:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Condition Use Permit is in accord with the criteria set forth therein for the following reasons:

   a) The proposed use is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

   b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed use.

   c) The proposed use has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

   d) The project is consistent with the Comprehensive General Plan of the City.

2. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

3. The Planning Commission hereby finds that Negative Declaration No. 2006-02-IES-ND-005 has been prepared and circulated in compliance with the provisions of the California Environmental Quality Act (CEQA), and the procedures set forth in the ordinances of the City of Redondo Beach.

4. The Planning Commission hereby finds and determines that the proposed project will not have a significant effect on the environment, subject to the modifications of the design review and conditions of approval.

5. The Planning Commission hereby finds that the proposed project will have a "de minimis" impact on fish and game resources pursuant to Section 21089(b) of the Public Resources Code.

6. n The Planning Commission further finds that in reviewing the Negative Declaration it has exercised its own independent judgment.

CONDITIONS:

1. That the approval granted herein is for the conversion of space and use on the second, third and fourth floors of the south tower of the most centrally located building (514 N. Prospect Avenue) from acute care facilities to an assisted living residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on May 18, 2006.

2. That the conversion of the second, third and fourth floors of hospital building to the new residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of May 18, 2006.

3. That long-term parking spaces be designated for residents to store their vehicles as required.

4. That a landscaping plan be developed to re-landscape the area directly in front of the building and adjacent to and within the enclosed to and within the enclosed patio/out door garden to be created for the residential care facility patients in conformance with water-conservation requirements.

5. That the Planning Department shall be authorized to approve minor changes to the conversion of the second, third and fourth floors of hospital building to the new residential care for seniors.

6. That the conversion of the second, third and fourth floors of hospital building to the new residential care for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

7. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

8. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Prepared by:

Anita Kroeger
Senior Planner

Approved by:

Randy Berler
Planning Director

S:\PLN\ANITA\CUPVAR\Prospect 514 N - Sr. assisted living 5.18.06.doc

Appendix C Mitigation Monitoring and Reporting Program

Appendices

This page intentionally left blank.

October 2024 | Mitigation Monitoring and Reporting Program
State Clearinghouse No. 2023050732

Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment

City of Redondo Beach

Prepared for:

City of Redondo Beach
Contact: Marc Wiener, Community Development Director
Sean Scully, Planning Manager
415 Diamond Street
Redondo Beach, California 90277
310.318.0637

Prepared by:

PlaceWorks
Contact: Mark Teague, AICP, Managing Principal, Environmental Services
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

Table of Contents

Section **Page**

1. INTRODUCTION 1
1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM 1
1.2 PROJECT CHARACTERISTICS 2
1.3 ENVIRONMENTAL IMPACTS 4
2. MITIGATION MONITORING PROCESS 7
2.1 MITIGATION MONITORING PROGRAM ORGANIZATION 7
2.2 DISPUTE RESOLUTION 8
2.3 ENFORCEMENT 8
3. MITIGATION MONITORING REQUIREMENTS 9
3.1 PREMONITORING MEETING 9
3.2 CATEGORIZED MITIGATION MEASURES/MATRIX 9
3.3 IN-FIELD MONITORING 9
3.4 DATABASE MANAGEMENT 9
3.5 COORDINATION WITH CONTRACTORS 9
3.6 LONG-TERM MONITORING 9
4. MITIGATION MONITORING REPORTS 19
4.1 FIELD CHECK REPORT 19
4.2 IMPLEMENTATION COMPLIANCE REPORT 19
4.3 DISPUTE/ENFORCEMENT REPORT 19
5. COMMUNITY INVOLVEMENT 21
6. REPORT PREPARATION 23

List of Tables

Table **Page**

Table 1 Buildout Statistical Summary 4
Table 2 Mitigation Monitoring Requirements 11

Table of Contents

This page intentionally left blank.

1. Introduction

1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The City of Redondo Beach (City) is the lead agency for the proposed Redondo Beach Focused General Plan Update, Zoning Ordinance Updates, and Local Coastal Program Amendment (proposed project) and has developed this Mitigation Monitoring and Reporting Program (MMRP) as a vehicle for monitoring and ensuring the successful implementation of mitigation measures outlined in the City of Redondo Beach proposed Redondo Beach Focused General Plan Update, Zoning Ordinance Updates, and Local Coastal Program Amendment Program Environmental Impact Report (PEIR), State Clearinghouse No. 2023050732. As the lead agency, the City is responsible for implementing the MMRP, which has been prepared in conformance with Section 21081.6 of the California Public Resources Code, as follows:

> (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
>
> (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
>
> (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, and/or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the PEIR and drafted to meet the requirements of Public Resources Code, Section 21081.6.

1.2 PROJECT CHARACTERISTICS

1.2.1 Project Location

The City of Redondo Beach is in the South Bay region of Los Angeles County. It is bordered to the north by Hermosa Beach, Manhattan Beach, Hawthorne, and El Segundo; to the east by Torrance and Lawndale; to the south by the Palos Verdes Peninsula; and to the west by the Pacific Ocean. The southwestern portion of the city stretches along approximately 2.6 miles of coastline between the border of Hermosa Beach to the north and Torrance to the south. Interstate and regional access are provided by Interstate 405 (I-405), which runs in a general north-south direction and passes through the northern portion of the city; State Route 107 (SR-107), a north-south state highway that borders the northeastern portion of the city; and Pacific Coast Highway (SR-1), a north-south highway that bisects the southern portion of the city.

1.2.2 Project Description

Project Summary

The General Plan represents the community's vision of its future; it also serves as the blueprint guiding the City. The City will use the goals and policies of the General Plan as a basis from which to make land use, housing, mobility, infrastructure (capital improvements), and open space and parks decisions. Redondo Beach has selected the year 2050 as its planning horizon. The City is updating five of the State-required elements that make up the General Plan:

- **Land Use.** Key components of the update to this element include the policy framework, which includes the goals and policies that guide land-use decisions and help shape future development and public investment; the land use plan, including the land use map and designations some of which implement the housing sites; the focus areas and special policy areas discussions; and the implementation measures.

- **Open Space and Conservation.** Key components of the update to this element include goals and policies that reconcile competing demands on open space resources, and emphasize the role parks, public spaces, recreation facilities and programs, community events, and the preservation of natural resources play in economic development, land use, sustainability, climate adaptation, infrastructure, and transportation goals.

- **Safety.** Key components of the update to this element include identifying natural and human-caused hazards and evaluating how these hazards are projected to change in the future. Goals and policies aim to minimize the effects of these hazards. For the Redondo Beach General Plan Update, the Environmental Hazards/Natural Hazards Element will become the state-mandated safety element.

- **Noise.** Key components of the update to this element include assessing the community's existing noise environment and providing goals and policies and implementation actions to proactively reduce noise and land use compatibility problems considerate of future noise contours.

- **Zoning Ordinance and Zoning Ordinance for the Coastal Zone.** Updates to the City's Zoning Ordinance and Zoning Ordinance for the Coastal Zone will include modifications for consistency with the

proposed General Plan, recently adopted Housing Element, and in the context of State laws such as Senate Bills 35 and 330.

- **Local Coastal Amendment.** To implement the changes proposed by the Focused General Plan Update and the proposed Zoning Ordinance Update within the coastal zone, the City must also amend portions of both the Land Use Plan (LUP) and Implementation Plan (IP) components of its Local Coastal Program (LCP). Proposed changes to the LUP include updates to the Land Use Map consistent with the Land Use Map in the Focused General Plan Update.

Proposed changes to the IP will include updates to the Zoning Map within the Coastal Zone to implement the Focused General Plan Update and updates to the Zoning Code for the Coastal Zone. Proposed changes to the Zoning Code for the Coastal Zone are consistent with the proposed Zoning Ordinance Update, except where changes would conflict with the provisions of the California Coastal Act. The Zoning Code changes related to the General Plan Update for areas the Coastal Zone do not include any changes that would impact coastal resource requirements, including provisions for off-street parking in parking constrained areas near the shoreline. In addition, development in the coastal zone will remain subject to current coastal development permit (CDP) procedures to ensure protection of coastal resources.

Each General Plan element contains a number of goal statements and related policy statements for each stated goal. Additionally, details for implementing policies in the General Plan are contained in the form of Implementation Actions. Updates to these elements are accompanied by associated revisions to the City's Zoning Ordinance and Local Coastal Program (LCP) needed to make them consistent and implement the updated goals and policies. The entirety of the updates to the General Plan, Zoning Ordinance, and LCP updates constitutes the "proposed project." Although the General Plan is composed of individual sections, or "elements," that individually address a specific area of concern, the General Plan embodies a comprehensive and integrated planning approach for the City.

Proposed General Plan and Buildout

Buildout projections represent development likely to occur based on past trends and anticipated levels of density and intensity for each land use category anticipated by the 2050 planning horizon of the proposed General Plan, and compares growth to existing conditions as summarized in Chapter 3, *Project Description*, Table 3-1, of the PEIR and below in Table1. Table 1 shows the potential for housing units, nonresidential building square footage, and jobs that are likely to be generated by the proposed Land Use Plan (see also Figure 3-5 of the PEIR and Appendix B, *Buildout Methodology Memorandum*, Table 8. *Proposed Land Use Plan Anticipated Density and Intensity*). As shown in Table 1, the proposed land uses would result in an increase of 4,956 residential dwelling units (16 percent), 8,667 residents (12 percent), 5,681,999 square feet of nonresidential development (48 percent), and 7,989 jobs (28 percent) compared to existing conditions.

Table 1 Buildout Statistical Summary

	Existing Conditions	Proposed Project
Dwelling Units	30,431	35,387
Population	70,311	78,978
Nonresidential Square Footage	11,826,277	17,508,276
Employment	28,638	36,627

Source: Appendix B, Buildout Methodology Memorandum.

1.3 ENVIRONMENTAL IMPACTS

The level of significance is identified for each impact in this Draft Program Environmental Impact Report (DEIR). Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would not change the environment.
- **Less than significant.** The project would not cause any substantial, adverse change in the environment.
- **Less than significant with mitigation incorporated.** The EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and unavoidable.** The project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

1.3.1 Impacts Found Not to Be Significant

- Aesthetics
- Agricultural and Forestry Resources
- Biological Resources
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Public Services
- Recreation
- Utilities and Service Systems

1.3.2 Potentially Significant Adverse Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

- Energy
- Geology and Soils
- Tribal Cultural Resources
- Transportation

1.3.3 Significant and Unavoidable Impacts

- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use
- Noise
- Population and Housing
- Transportation

1. Introduction

This page intentionally left blank

2. Mitigation Monitoring Process

2.1 MITIGATION MONITORING PROGRAM ORGANIZATION

Overall MMRP management is the responsibility of the City of Redondo Beach. The City's technical consultants (CEQA consultant, etc.) may perform related monitoring tasks under the direction of the environmental monitor (i.e., the qualified/professional expert in charge of monitoring and/or implementing mitigation) if they are contracted by the City.

2.1.1 City of Redondo beach

As the lead agency, the City is responsible for the review of all monitoring reports, enforcement actions, and document disposition. The City will rely on information provided by individual monitors (*e.g.,* CEQA consultant, etc.) as accurate and up to date, and will field check mitigation measure status, as required.

2.1.2 Mitigation Monitoring Team

The mitigation monitoring team, consisting of the designated Project Manager (e.g., Community Development Director) and Technical Consultants (CEQA consultant, etc.) are responsible for monitoring implementation and compliance with all adopted mitigation measures and conditions of approval. A major portion of the team's work will entail in-field monitoring and compliance report preparation. Implementation disputes are brought to the Project Manager, and any appeals would go to the City Manager and ultimately the City Council.

2.1.3 Monitoring Team

The following summarizes key positions in the MMRP and their respective functions:

- **Project Manager:** Responsible for coordination of mitigation monitoring team, technical consultants, report preparation, and overall program administration and document/report clearinghouse.
- **Construction Contractor:** Responsible for coordination of mitigation monitoring team; technical consultants; report preparation; and implementation the monitoring program, including overall program administration, document/report clearinghouse, and first phase of dispute resolution.
- **Technical Consultants:** Responsible for monitoring in respective areas of expertise (CEQA consultant, project engineer, noise analyst/specialist). Report directly to the Project Manager.

2.1.4 Recognized Experts

The use of recognized experts on the monitoring team is required to ensure compliance with scientific and engineering mitigation measures. The mitigation monitoring team's recognized experts assess compliance with required mitigation measures, and recognized experts from responsible agencies consult with the Project Manager regarding disputes.

2.2 DISPUTE RESOLUTION

If the monitoring team determines that a mitigation measure, in the opinion of the monitor, has not been implemented or has not been implemented correctly, the problem will be brought before the Project Manager for resolution. The decision of the Project Manager is final unless appealed to the City Manager. The Project Manager will have the authority to issue stop-work order until the dispute is resolved.

2.3 ENFORCEMENT

Public agencies may enforce conditions of approval through their existing police powers using stop-work orders, fines, infraction citations, revocation of approval/permits, or in some cases, notice of violation for tax purposes.

3. Mitigation Monitoring Requirements

3.1 PREMONITORING MEETING

A premonitoring meeting will be scheduled to review mitigation measures, implementation requirements, schedule conformance, and mitigation monitoring team responsibilities. At such meetings, the monitoring team rules are established, the entire mitigation monitoring program is presented, and any misunderstandings are resolved.

3.2 CATEGORIZED MITIGATION MEASURES/MATRIX

Project-specific mitigation measures have been categorized in matrix format, as shown in Table 2, *Mitigation Monitoring Requirements*. The matrix identifies the environmental factor, specific mitigation measures, schedule, and responsible monitor. The mitigation matrix will serve as the basis for scheduling the implementation of and compliance with all mitigation measures.

3.3 IN-FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (*e.g.,* hard hat, glasses) shall be worn at all times in construction areas. Injuries shall be immediately reported to the mitigation monitoring team.

3.4 DATABASE MANAGEMENT

All mitigation monitoring reports, letters, and memos shall be prepared utilizing electronic software, such as Microsoft Word, Adobe, etc.

3.5 COORDINATION WITH CONTRACTORS

The construction manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

3.6 LONG-TERM MONITORING

Long-term monitoring related to several mitigation measures will be required, including review of project plans to ensure compliance with the most recent versions of the California Building Code and California Fire Code. Post-construction fire inspections are conducted on a routine basis by the City of Redondo Beach Fire Department.

3. Mitigation Monitoring Requirements

This page intentionally left blank.

3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
AIR QUALITY					

AQ-1	Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include, but are not limited to the following:
	• Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
	  • Requiring use of nontoxic soil stabilizers to reduce wind erosion.
	  • Applying water every four hours to active soil disturbing activities.
	  • Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
	• Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.
	• Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
	• Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
	• Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.
		Future Project Applicants	Prior to Discretionary Approval	City of Redondo Beach Community Development Department	

3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
AQ-2	Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following: • For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions. • Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use. • Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485). • Provide changing/shower facilities as specified in the Nonresidential Voluntary Measures of CALGreen. • Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen. • Provide facilities to support electric charging stations per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen. • Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check.	Future Project Applicants	During Plan Check and Prior to Discretionary Approval	City of Redondo Beach Community Development Department	

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
AQ-3	Industrial and Warehouse Development Health Risk Assessments. Prior to discretionary approval by the City of Wildomar, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (*e.g.,* residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit an operational health risk assessment (HRA) to the City of Wildomar Planning Department for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast AQMD. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective threshold, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify best available control technologies for toxics (T BACTs) and appropriate enforcement mechanisms and demonstrate that they are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include but are not limited to restricting idling on-site or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.	Future Project Applicants	Prior to Discretionary Approval for Industrial and Warehouse Developments	City of Redondo Beach Community Development Department	
CULTURAL RESOURCES					
CUL-1	Historical Resources Assessment. For discretionary projects that involve construction activities that may adversely impact potentially eligible historical resources (i.e., structures 45 years or older), a historical resources assessment shall be performed by an architectural historian or a historian who meets the Secretary of the Interior's Professionally Qualified Standards (PQS) in architectural history or history. The assessment shall include a records search to determine if any resources that may be potentially affected by the project have been previously recorded, evaluated, and/or designated in the National Register of Historic Places, California Register of Historic Resources (CRHR), or local register of historic resources. Following the records search, the qualified historian or architectural historian shall conduct a reconnaissance-level and/or intensive-level survey in accordance with the California Office of Historic Preservation guidelines to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project. Pursuant to the definition of a historical resource under CEQA, potential historical resources shall be	Future Project Applicants and Qualified Cultural Resources Specialist	Prior to Issuance of Demolition, Grading, and/or Building Permits.	City of Redondo Beach Community Development Department	

3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	evaluated under a developed historic context. The assessment shall provide the historic context, methods, results, and recommendations for appropriate findings. The assessment shall be provided to the Director of the Community Development Department for concurrence as to the appropriate mitigation for historic resources.				
CUL-2	**Cultural Resources Assessment.** For discretionary projects that involve ground-disturbing activities during construction on areas where no previous ground disturbance or excavation has occurred, or ground-disturbing activities would occur in native soil, a site-specific cultural resources study shall be completed prior to project approval. The study shall include records searches of the California Historical Resources Information System and the Sacred Lands File maintained by the Native American Heritage Commission. The records searches shall determine if the proposed project has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If the records search identifies a sensitivity for archaeological resources, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's PQS in either prehistoric or historic archaeology. If the archaeological assessment indicates the area to be of medium sensitivity for archaeological resources, an archaeologist who meets the PQS shall be retained on an on-call basis. If the archaeological assessment indicated the area to be highly sensitive for archaeological resources, a qualified archaeologist shall monitor all ground-disturbing construction and pre-construction activities.	Future Project Applicants and Professional Archaeologist	Prior to Issuance of a Grading Permit and during Ground-Disturbing Activities	City of Redondo Beach Community Development Department	

3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
CUL-3	All Projects. If cultural resources are discovered during ground-disturbing activities, all ground-disturbing activities within 50 feet of the find shall be halted until a meeting is convened between the developer, archaeologist, tribal representatives, and the Director of the Community Development Department, or their assigned designee. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representatives, developer, and archaeologist, a decision shall be made, with the concurrence of the Director of the Community Development Department, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.	Future Project Applicants and Professional Archaeologist	During Ground-Disturbing Activities	City of Redondo Beach Community Development Department	
GEOLOGY AND SOILS					
GEO-1	Low-to-High Sensitivity. Prior to issuance of a grading permit for discretionary projects that involve ground disturbance in previously undisturbed areas mapped with "low-to-high" paleontological sensitivity, the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have sensitivity, a qualified paleontologist shall be retained to develop and implement a Paleontological Resources Impact Mitigation Plan. The paleontologist shall have the authority to halt construction during ground disturbing activities as outlined in Mitigation Measure GEO-2.	Future Project Applicants and Licensed Professional Engineer	Prior to Issuance of a Grading Permit and during Ground-Disturbing Activities	City of Redondo Beach Building and Safety Department and Community Development Department	
GEO-2	All Projects. In the event of any fossil discovery, regardless of depth or geologic formation, ground disturbing activities shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology. The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified, and a curatorial arrangement shall be signed as part of the Paleontological Impact Mitigation Plan (GEO-1) and prior to collection of the fossils.	Future Project Applicants and Certified Paleontologist	Prior to Issuance of a Grading Permit	City of Redondo Beach Community Development Department	

3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
GREENHOUSE GAS EMISSIONS					

GHG-1	The City of Redondo Beach shall prepare an update Climate Action Plan (CAP) to achieve the greenhouse gas (GHG) reduction targets of Senate Bill (SB) 32 for the year 2030 and chart a trajectory to achieve the long-term GHG reduction goal set by Assembly Bill (AB) 1279. The updated CAP shall be completed within three years of certification of the General Plan EIR. The updated CAP shall be updated every five years to ensure the City is monitoring the plan's progress toward achieving the City's GHG reduction target and to require amendment if the plan is not achieving a specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under SB 32 for year 2030, AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update.
	The CAP update shall include the following:
	• GHG inventories of existing and forecast year GHG levels.
	• Tools and strategies for reducing GHG emissions to achieve the GHG reduction goals of Senate Bill 32 for year 2030.
	• Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.
	• Plan implementation guidance that includes, at minimum, the following components consistent with the proposed updated CAP:
	  • Administration and Staffing
	  • Finance and Budgeting
	  • Timelines for Measure Implementation
	  • Community Outreach and Education
	  • Monitoring, Reporting, and Adaptive Management
	Tracking Tools.
		City of Redondo Beach Public Works and Engineering Department and Community Development Department	During Future Updates of the Subregional CAP	City of Redondo Beach Public Works and Engineering Department and Community Development Department	

3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
NOISE					
N-1	**Construction Noise Measures.** Construction contractors shall implement the following measures for construction activities conducted in the City of Redondo Beach. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans. The City of Redondo Beach Planning and Building Divisions shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading, and/or building permits. • During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible. • Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. • Stationary equipment, such as generators and air compressors, shall be located as far as feasible from nearby noise-sensitive uses. • Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors. • Construction traffic shall be limited, to the extent feasible, to approved haul routes established by the City Planning, Engineering, and Building Divisions. • At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City. • Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. • During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-	Future Project Applicants and Construction Contractor	Prior to Issuance of Demolition, Grading, and/or Building Permits and During Construction Activities	City of Redondo Beach Community Development Department and Building and Safety Department	

3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws. • If construction is anticipated for prolonged periods, as required by the Community Development Director or their assigned designee, erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier.				
N-2	Noise and Vibration Analysis. Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, within 100 feet of nonengineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for nonengineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed these thresholds, alternative uses shall be used, such as drilling piles instead of pile driving and static rollers instead of vibratory rollers. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.	Future Project Applicants and Qualified Acoustical Consultant	Prior to Issuance of a Building Permit	City of Redondo Beach Community and Development Department and Building and Safety Department	
N-3	Vibration Analysis. Prior to discretionary approval by the City of Redondo Beach for development projects subject to review under the California Environmental Quality Act (CEQA) (i.e., nonexempt projects), that utilize equipment that has the potential to result in vibration (e.g., pile drivers, jack hammers, and vibratory rollers), a vibration analysis shall be conducted to assess and mitigate potential vibration impacts. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents	Future Project Applicants and Qualified Acoustical Consultant	Prior to Discretionary Approval for Industrial Projects	City of Redondo Beach Community and Development Department and Building and Safety Department	

4. Mitigation Monitoring Reports

Mitigation monitoring reports are required to document compliance with the Mitigation Monitoring Program and to resolve disputes. Specific reports include:

- Field Check Report
- Implementation Compliance Report
- Dispute/Enforcement Report

4.1 FIELD CHECK REPORT

Field check reports are required to record in-field compliance and conditions.

4.2 IMPLEMENTATION COMPLIANCE REPORT

The Implementation Compliance Report (ICR) is prepared to document the implementation of mitigation measures on a phased basis, based on the information in Table 3-1. The report summarizes implementation compliance, including mitigation measures, date completed, and monitor's signature.

4.3 DISPUTE/ENFORCEMENT REPORT

The Dispute/Enforcement Report (DER) is prepared to document the outcome of the Project Manager or City Manager and becomes a portion of the ICR.

4. Mitigation Monitoring Reports

This page intentionally left blank.

5. Community Involvement

Monitoring reports are public documents and are available for review by the general public. Discrepancies in monitoring reports can be taken to the Project Manager or Community Development Director by the general public.

5. Community Involvement

This page intentionally left blank.

6. Report Preparation

LIST OF PREPARERS

City of Redondo Beach

Marc Wiener, Community Development Director

Sean Scully, Sean Scully, Planning Manager

PlaceWorks

Mark Teague, AICP, Managing Principal

Jennifer Kelley, Senior Associate

Olivia Morris, Planner

6. Report Preparation

This page intentionally left blank.