

1.0 INTRODUCTION

1.1 OVERVIEW

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

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

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

1.2 LEAD AGENCY

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

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

1.3 PURPOSE AND LEGAL AUTHORITY

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

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

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

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

1.4 PUBLIC REVIEW AND COMMENTS

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

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

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

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

Following the public review period, a Final EIR will be prepared. The Final EIR will include responses to all written comments received during the public review period.

1.5 REQUIRED APPROVALS

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

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

- Wastewater Discharge Permit (Los Angeles Regional Water Quality Control Board [RWQCB]);
- Standard Urban Storm Water Mitigation Plan (Los Angeles RWQCB); and
- Permit to Construct (South Coast Air Quality Management District).

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

1.6 PROJECT BACKGROUND

In 2017, BCHD began investigating escalating maintenance costs and seismic-related structural issues associated with the former South Bay Hospital, originally constructed in 1958. Following initial public outreach with neighbors, residents, and community leaders in May 2017, BCHD formed a 20-person Community Working Group (CWG) to engage local participants in the planning of a modernized campus that would be integrated with the surrounding community including Redondo Beach and the Torrance. The CWG consisted of an



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

informal, voluntary group of stakeholders from each of the three Beach Cities and the Torrance. Participants included leaders from local businesses, civic organizations, older adult services, the Blue Zones Project, and neighboring residents. The focused group was formed to engage in constructive collaboration and assisting in distributing information to the community as the planning process progressed. The CWG held 17 meetings to discuss various components of the proposed Healthy Living Campus Master Plan and was eventually dissolved in December 2020 following the conclusion of the preliminary planning and design phases for the proposed Healthy Living Campus Master Plan.

BCHD staff also conducted outreach for the Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan. Study circles (i.e., informal group sessions) were comprised of diverse stakeholders from Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach and were designed to encourage local input into the planning process

for the proposed Healthy Living Campus Master Plan. The three study circles were each centered on a primary focus, which included Intergenerational Programs, Creating Community Gathering Spaces, and Creating a Center of Excellence. Key comments collectively expressed by participants were related to accessibility and inclusivity of the campus, improving transportation options, providing activities and facilities for all ages, creating multi-use outdoor spaces, and fostering community connections to provide an inclusive and welcoming environment.



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1.7 SCOPE OF THE EIR

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

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

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

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

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

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

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

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

1.8 AREAS OF KNOWN PUBLIC CONTROVERSY

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

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

- Potential impacts related to fugitive dust emissions and human health risk during construction activities, particularly within the adjacent residential neighborhoods (see Section 3.2, *Air Quality*).
- Duration and extent of on- and off-site noise and vibration impacts associated with the use of heavy construction equipment. (see Section 3.11, *Noise*)
- Potential impacts to existing biological resources (e.g., mature trees and landscaping along Flagler Lane; (see Section 3.03, *Biological Resources*)
- Compliance with the National Pollutant Discharge Elimination System Program and development of a Stormwater Pollution Prevention Plan that addresses erosion, particularly along Flagler Lane and Flagler Alley (see Section 3.09, *Hydrology*).
- Potential construction-related impacts on pedestrian and bicycle safety, especially as it relates to truck traffic within the vicinity of nearby residential neighborhoods, parks, and schools (see Section 3.14, *Transportation*).
- Construction planning and monitoring (e.g., standard construction times, heavy haul truck routes, temporary road and sidewalk closures, construction flaggers, etc.) (see Section 3.11, *Noise*).
- Building height compatibility (e.g., bulk, mass, and scale) and potential impacts to the existing public views and shade/shadows, particularly within the adjacent residential neighborhoods (see Section 3.1, *Aesthetics and Visual Resources*).
- Potential for the former South Bay Hospital or other buildings on campus to merit review by the Redondo Beach Historic Preservation Commission and the potential to encounter archaeological resources during construction (see Section 3.4, *Cultural Resources and Tribal Cultural Resources*).
- Seismicity, soil stability, and other related on-site geologic hazards (see Section 3.6, *Geology and Soils*).
- GHG emissions associated with construction and operational activities of the proposed Healthy Living Campus Master Plan (see Section 3.7, *Greenhouse Gas Emissions*).
- Noise impacts associated with operations under the proposed Healthy Living Campus Master Plan (e.g., frequency of emergency response and associated noise from sirens; see Section 3.11, *Noise*).
- The potential for exposure to hazardous materials including but not limited to asbestos, lead-based paints, mold, and other materials associated with the former South Bay Hospital (see Section 3.8, *Hazards and Hazardous Materials*).
- Potential impacts associated with the previously decommissioned oil and gas well on the vacant Flagler Lot (e.g., exposure to hazardous substances) (see Section 3.8, *Hazards and Hazardous Materials*).

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

1.9 ORGANIZATION OF THE EIR

This EIR is organized into the following eight sections.

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

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

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

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

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

Appendices to the EIR include the NOP and responses to the NOP (see Appendix A) as well as the supporting technical studies used as a basis of information and analyses in preparation of the environmental analysis in the EIR (Appendix B through M).

