

4.0 OTHER CEQA CONSIDERATIONS

This section of the Environmental Impact Report (EIR) presents the evaluation of additional environmental impacts analyses required by the California Environmental Quality Act (CEQA) that are not discussed in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, including significant unavoidable effects, significant irreversible environmental changes, growth-inducing impacts (including removal of obstacles to growth), and environmental resource areas that would experience negligible or no environmental impacts. CEQA Guidelines Section 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation.

4.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. Where there are significant impacts, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Noise

All phases of construction associated with the proposed Project would involve the use of heavy construction equipment (e.g., cranes, bulldozers, excavators, etc.). Demolition and excavation would involve the use of haul trucks, and construction of the proposed buildings during Phase 1 and Phase 2 would require extensive concrete pours requiring additional truck trips. Construction activities would produce increased noise levels that would impact surrounding noise-sensitive receptors. Mitigation Measure (MM) NOI-1 would require the implementation of noise attenuation measures, including the use of noise barriers (i.e., sound walls) or noise blankets (i.e., sound absorbing materials). Compliance with existing local noise regulations along with the implementation of MM NOI-1 would reduce potential noise impacts. However, given the maximum roof heights of the proposed Residential Care for the Elderly (RCFE) Building (i.e., 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below) and other proposed building(s) under the Phase 2 development program (i.e., up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below), construction of noise barriers to a height necessary to break the line of sight from surrounding sensitive receptors would be infeasible. Therefore, *significant and unavoidable* noise impacts would occur for the duration of construction of both phases of the proposed Project.

4.2 REASONS THE PROJECT IS BEING PROPOSED NOTWITHSTANDING ITS SIGNIFICANT AND UNAVOIDABLE IMPACTS

In addition to identification of the significant and unavoidable impacts associated with the proposed Project, CEQA Guidelines Section 15126.2(c) requires a description of the reasons why a project is being proposed, notwithstanding significant and unavoidable impacts.

As previously described in Section 4.1, *Significant and Unavoidable Effects*, the proposed Project would result in significant and unavoidable off-site construction-related noise impacts. Compliance with existing local noise regulations along with the implementation of MM NOI-1 would reduce potential construction noise impacts; however, given the maximum roof heights of the proposed buildings of up to 103 feet above the existing campus ground level and 133.5 feet above the vacant Flagler Lot. The necessary noise barrier heights required to mitigate the noise from construction activities above 30 feet are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Compliance with existing local noise regulations along with the implementation of MM NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. However, *significant and unavoidable* noise impacts would occur throughout the duration of the proposed construction activities.

These construction-related noise impacts would occur within the hours permitted by the Redondo Beach Municipal Code (RBMC) Section 4-24 and the Torrance Municipal Code (TMC) 6-46. While construction related noise would exceed the Federal Transit Administration (FTA) noise thresholds, neither the RBMC nor the TMC set quantitative noise limits on construction equipment during these hours.

Notwithstanding the significant impacts associated with construction-related noise impacts, the proposed Project has been proposed by BCHD to achieve the objectives described in Section 2.4, *Project Objectives*. The proposed Project would address escalating building maintenance costs associated with the former South Bay Hospital Building (i.e., 514 North Prospect Avenue). These costs are anticipated to exceed the annual operational revenue of BCHD within the next 2 to 3 years and create an operational deficit if left unresolved. Additionally, the South Bay Hospital is over 60 years old, does not meet the current seismic requirements of the California Building Code (CBC), and presents a public safety hazard (Nabih Youssef and Associates Structural Engineers 2018). The proposed Project would provide a long-term solution to seismic safety hazards through the demolition and replacement of the South Bay Hospital (and Beach Cities Health Center) with new facilities that comply with the latest State and local building code standards and are capable of withstanding lateral ground movement from an earthquake.

4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) requires a discussion of “*significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*”

Development of the proposed Project would result in the irreversible alteration of the built environment and the irreversible consumption of limited amounts of slowly renewable resources and non-renewable resources due to construction and operation. Construction associated with the proposed Project would involve the consumption of building materials and energy, including lumber and other forest products; raw materials such as steel; aggregate materials used in concrete and asphalt, such as sand and stone; water; petrochemical construction materials, such as plastic; and petroleum-based construction materials. In addition, fossil fuels would be consumed for construction of the proposed Project. The consumption of limited slowly renewable resources and nonrenewable resources would continue throughout the operational lifetime of the proposed Project because the proposed 157 Assisted Living units, 14,000 sf of space for PACE services, 6,270 sf of Community Services space, 37,150 sf of Wellness Pavilion space, 31,300 sf Aquatic Center, and 20,000 sf of Center for Health and Fitness would require resources such as water, petroleum, and natural gas.

Although the proposed Project would necessarily result in the consumption of such resources, the proposed Project would contribute to a land use pattern that would promote an overall reduction in resource consumption per capita. The proposed Project would provide a mix of compatible uses to activate the proposed pedestrian pathways and encourage walking by future residents, employees, and patrons of the site. The compatible mix of uses would also encourage campus visitors to participate in several programs at the Project site, which would reduce vehicle miles traveled (VMT). In addition, bicycle amenities would include lockers and showers for commercial employees who bike to work, ground level short-term visitor bicycle parking, long-term parking for employees, secured parking for residents, and residential elevators to facilitate convenient transport of bicycles within the Project site.

As required by the RBMC and the TMC, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11), and the Torrance Water Conservation and Water Supply Shortage and Sustainability Program requirements. Additionally, the proposed buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification and would be WELL Building Certified. The proposed Project would include a variety of conservation features, which would be finalized in a final design plans, including photovoltaic solar panels, solar hot water systems, and other renewable energy resources; LED lighting; solar swimming pool heating; retention and potential reuse of on-site stormwater pollution; and water efficiency features. The proposed Project would reduce waste with on-site recycling containers to support the City of Redondo Beach's recycling efforts. The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; electric vehicle (EV) charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. The proposed Project would also implement a transportation demand management (TDM) plan with trip reduction strategies, such as transit and carpool incentives for employees, to reduce single-occupancy vehicle trips to the Project site (refer to Section 3.14, *Transportation*). These additional sustainability features would further reduce new energy demand and the consumption of water and non-renewable fossil fuels.

Consumption of these resources would be relatively small in scale in comparison to the region and are not unique to the Project. Further, the consumption of resources would be consistent with regional and local growth forecasts in the area, and would occur in accordance with State and local goals and requirements. Additionally, because the Project site does not contain these resources, the Project would not directly impact or interrupt the production or delivery of such resources. The Project's irreversible changes to the environment would be *less than significant*.

4.4 GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(e) requires a discussion of ways in which a project could foster economic or population growth, either directly or indirectly, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A project may induce growth if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to population growth, taxes community service facilities to the extent that the construction of new facilities would be necessary, or encourages or facilitates other

activities that cause significant environmental effects. In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project results in the urbanization of land in a remote location (leapfrog development)
- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth inducing projects are in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encouraging premature or unplanned growth. However, in urban areas, growth inducing projects typically involve proposed plans or policies that alleviate barriers to growth or increase opportunities for development.

To comply with CEQA, an EIR must discuss the ways in which the proposed project could promote economic or population growth near the project area and how that growth would, in turn, affect the surrounding environment. Under CEQA, this growth is not to be considered “*necessarily detrimental, beneficial, or of little significance to the environment*” (CEQA Guidelines Section 15126.2[e]). Induced growth is considered a significant impact only if it affects (directly or indirectly) the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

Population, Employment, and Housing Growth

The proposed Project would develop 217 residential units, including replacement of 60 existing Memory Care units and development of 157 new Assisted Living units. The proposed Project is anticipated to increase the population within the Cities by approximately 177 residents (refer to Section 3.12, *Population and Housing*). Relative to the populations of Redondo Beach and Torrance, the expected net increase in residential population resulting from the proposed Project would be less than 1 percent and would not be considered substantially growth inducing (U.S. Census Bureau 2017).

The provision of new Assisted Living units is a primary objective of the proposed Project, consistent with the goals and policies within the Redondo Beach General Plan Housing Element

to promote new housing which meets the needs of seniors and the disabled such as Policies 3.1, 3.4, 3.5, and 5.2, (refer to Section 3.10, *Land Use and Planning* and Section 3.12, *Population and Housing*).

The proposed Project would generate short-term employment opportunities during construction, which would draw workers from the existing regional work force. Additionally, Phase 1 and Phase 2 of the proposed Project are expected to employ approximately 170 full-time equivalent employees. The proposed Project is expected to draw most workers from the existing regional workforce. Therefore, the proposed Project would not be considered growth inducing because it would not substantially affect long-term employment opportunities or require the construction of additional housing stock.

Potential impacts associated with population, employment, and housing anticipated to result from implementation of the proposed Project are further addressed in Section 4.4, *Effects Found Not to Be Significant*.

4.4.1 Removal of Obstacles to Growth

The proposed Project would be located within an urbanized area, which is well-served by existing infrastructure including streets, water system, sewer system, and electricity/natural gas service. Because the proposed Project constitutes redevelopment of a currently developed site within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, Project implementation would not remove an obstacle to growth.

The proposed Project would implement the policies of the Housing Elements of the Redondo Beach General Plan and Torrance General Plan. The siting of 157 new housing units (177 bed spaces) within 0.2 miles of the several bus stops along the Beach Cities Transit Line 102 would be consistent with Redondo Beach General Plan Housing Element (e.g., Policy 3.3) goals and policies (refer to Section 3.10, *Land Use and Planning*) to increase housing opportunities near existing transit. The creation of 157 Assisted Living units is also consistent with the Redondo Beach General Plan Housing Element (e.g., Policy 5.2), which aims to enhance existing housing stock and expand housing opportunities that meet the special needs of elderly and disabled residents. The proposed Project would not induce additional growth other than what was already anticipated in the RTP/SCS and the Redondo Beach General Plan Housing Element and would not have growth inducing impacts.

4.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Through the scoping process, BCHD determined that the proposed Project would have *no impact* on: Agriculture and Forestry Resources; Mineral Resources; Recreation; and Wildfire.

Agriculture and Forestry Resources

The proposed Project would not have the potential for significant impacts associated with important agricultural or forestry resources. The Project site and surrounding areas are urbanized and do not contain any developed agricultural or forestry resources. The proposed Project would not change any land use designations affecting such resources and would not indirectly affect such resources. Therefore, there would be *no impacts* to these resource areas.

Mineral Resources

The proposed Project would not have the potential for significant impacts associated with important mineral resources. No mineral extraction operations occur on the site or in the nearby vicinity. Additionally, the Project site is not designated as an existing mineral resource extraction area by the State of California. Given that the Project site is located within a highly urbanized area of the Cities and has been previously disturbed by development, the potential for mineral resources to occur onsite is low (City of Torrance 2010). Therefore, construction and operation of the proposed Project would not result in the loss of availability of a mineral resource or mineral resource recovery site and *no impacts* would be expected.

Recreation

The City of Redondo Beach has 32 regional, community, neighborhood parks and parkettes that total over 130 acres and range in size from 0.07 acres (i.e., Matthews Parkette) to 20.6 acres (i.e., Dominguez Park) (City of Redondo Beach 2008). Similarly, the City of Torrance Community Services Department operates and manages over 40 parks and recreation facilities, libraries, and open spaces for residents of Torrance and the South Bay. Parks in Torrance range in size from 0.1 acre (i.e., John F. Kennedy and Keller Memorial Squares) to 52 acres (i.e., Columbia Park) (City of Torrance 2010). The cities also provide and maintain stretches of sandy beach, off-leash dog parks, bike and walking paths, lawn areas, and other recreational opportunities for residents, employees, and visitors. Recreational areas near the Project site include the Dominguez Park

(northeast of Beryl Street and Flagler Lane), Sunnyglen Park (approximately 1,190 feet southwest), and Entradero Park (approximately 1,390 feet east).

Redondo Beach's park inventory of more than 150 acres currently provides approximately 2.3 acres of parkland per 1,000 residents, and Torrance's park inventory of more than 355 acres provides approximately 2.44 acres of parkland per 1,000 residents, well below the Los Angeles County average of 3.3 acres per 1,000 residents (County of Los Angeles and County of Los Angeles Department of Parks & Recreation 2016). The proposed Project would provide approximately 125,890 sf of open space during Phase 1 and approximately 114,830 sf of open space during Phase 2 of the proposed Project, including a central lawn for public events such as outdoor movie nights, sensory gardens, a flexible use platform for fitness classes, landscaped pedestrian pathways, two outdoor dining terraces, and a Demonstration Garden. The proposed Project would also include a tree-lined promenade (Main Street) that could support farmers' markets and health fair expositions and a porch along the southern façade of the RCFE Building. Landscaped private open space (i.e., backyard garden lounge) is also included along the northern exterior of the RCFE building. The proposed Project also includes construction of a 31,300-sf Aquatic Center. Although this would not be considered a formal recreational amenity, public enjoyment of these facilities may substitute for some of the recreational demand for other recreational facilities throughout the City.

Because the proposed Project would not substantially increase demand on recreational facilities, potential impacts to recreational resources would be considered *less than significant*. Therefore, no further analysis of this issue is required.

Wildfire

The Project site is in a highly urbanized area and entirely within a Local Responsibility Area (LRA), approximately 3.3 miles from the nearest designated High or Very High Fire Hazard Severity Zone (FHSZ) associated with the Palos Verdes Estates. Redevelopment of the Project site would not exacerbate wildfire risks. The proposed Project would not involve installation of any infrastructure such as high-tension electricity lines that would exacerbate wildfire risk and would not increase public exposure to wildfires (i.e., placing residential uses in areas of high wildfire risk). Although the Project site is located on a significant slope, Project implementation would comply with all recommendations in the Geotechnical Study Report (refer to Section 3.6, *Geology and Soils*) and would employ low-impact development (LID) drainage systems on-site (refer to Section 3.9, *Hydrology and Water Quality*). Therefore, the proposed Project would not result in increased structural or population hazards associated with post-fire slope instability or drainage alterations. The Project site is accessible from multiple emergency response routes and would not

change or block an existing evacuation route since it is proposed within an established collection of parcels.

The Redondo Beach Fire Department (Rbfd), which currently serves the Project site, has an average response time for medical emergencies of 5 minutes below the 6-minute objective established by the National Fire Protection Association (NFPA). The proposed Project would comply with all applicable Fire Code requirements (RBMC Title 3 Chapter 4 and TMC Division 8 Chapter 5) and the 500-foot maximum distance between existing fire hydrants would remain. Further, the 2020 Sewer Capacity Study prepared by John Labib & Associates for the Project indicates there is sufficient water pressure in the Project vicinity to support the Project (refer to Section 3.15, *Utilities and Service Systems*; see Appendix L). Therefore, there would be *no impacts* and issues involving wildfires are not analyzed further in this EIR.

Other Topics with No Impacts

Additional topics within environmental issue areas that would not result in potentially significant impacts were eliminated from further assessment in the EIR through the IS. The resource sections and topics not discussed further in the EIR include:

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

Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

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

private airstrip or Airport Influence Area for the Hawthorne Municipal Airport or and LAX.

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

