

8.0 RESPONSES TO COMMENTS ON THE DRAFT EIR

8.1 INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, the Beach Cities Health District (BCHD), as the lead agency, has reviewed all of the comments received on the Draft Environmental Impact Report (EIR) for the proposed Healthy Living Campus Master Plan (Project), including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on March 24, 2021, April 13, 2021, and April 17, 2021. The Final EIR provides written responses to all comments on the Draft EIR raising significant environmental issues that were received during the 90-day public review period. The comments on the Draft EIR include issues raised by the public that warrant clarification or correction of certain statements in the Draft EIR. However, none of the corrections or additions to the Draft EIR constitute significant new information or substantial changes to the proposed Project as defined by CEQA Guidelines Section 15088.5.

The Draft EIR was made available for a 90-day review period between March 10, 2021 and June 10, 2021. During this period, a total of 303 individual and written comment letters and 17 oral comments were received. Each of the commenters is listed in Table 8-1. This table is immediately followed by Master Comment Responses (see Section 8.2, *Master Comment Responses*) and then responses to the comments that were included in each of the individual comment letters (see Section 8.3, *Individual Comment Responses*).

Each comment letter has been assigned an abbreviation based on the first and last name of the commenter (e.g., the comment from Keith Butler, Chief Business Officer, Torrance Unified School District has been abbreviated as “KB”). The body of each comment letter has been separated into individual comments, which have been numbered. This results in a numbering system whereby the first comment in the letter from Torrance Unified School District is depicted as Comment KB-1, and so on. These numbered comments are included in their entirety, followed by the corresponding responses. Copies of the comment letters are included in Appendix O of this Final EIR. Table 8-1 presents a list of all persons or organizations who submitted written comments and/or oral comments on the Draft EIR.

Table 8-1. Summary of Public Comments Received on the Draft EIR

Comment ID	Name of Commenter	Date Received	Number of Comments
Public Agencies			

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Comment ID	Name of Commenter	Date Received	Number of Comments
EG	Emily Gibson / Frances Duong, Associate Transportation Planner, Local Development – Intergovernmental Review, California Department of Transportation (Caltrans) District 7, Los Angeles	June 10, 2021	10
KB	Keith Butler, Chief Business Officer, Torrance Unified School District	April 29, 2021	5
PF1	Patrick Furey, Mayor, City of Torrance	June 3, 2021	42
WB	William (Bill) Brand, Mayor, City of Redondo Beach	June 8, 2021	54
Non-Governmental Organizations			
MC	Marcia Cook, Chair, Sierra Club Palos Verdes / South Bay Group	June 8, 2021	16
Neighborhood Organizations			
TRAO	Torrance Redondo Against Overdevelopment (TRAO)	June 1, 2021	134
Legal Comments			
RLD	Rebecca L. Davis, Lozeau Drury LLP on behalf of Supporters Alliance for Environmental Responsibility (SAFER)	June 10, 2021	1
RR1	Robert R. Ronne	June 3, 2021	10
RR2		June 3, 2021	8
RR3		June 3, 2021	16
RR4		June 3, 2021	2
RR5		June 4, 2021	2
RR6		June 4, 2021	2
RR7		June 4, 2021	10
RR8		June 4, 2021	14
RR9		June 4, 2021	18
RR10		June 5, 2021	7
RR11		June 6, 2021	2
RR12		June 9, 2021	1
Form Letters			
FL1	Form Letter 1 <ul style="list-style-type: none"> • Anonymous/Unknown • Patrick Wickens • Judith Scott • William & Vivian Shanney • Peggy Gilhooly • Jerry Lake 	May 23, 2021 – June 9, 2021	72

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Comment ID	Name of Commenter	Date Received	Number of Comments
	<ul style="list-style-type: none"> • Hamant & Robin Patel • Janet Smolke • Louis Friedman • Fred Fasn • Dale Smolke • Peter Friedman • Pennie • Nancy Orchard • Carol Friedman • Marcio Nava • Bruce Steele 		
FL2	Form Letter 2 <ul style="list-style-type: none"> • Lisa Youngworth • Fred Fasn • Pennie • Peter Friedman • Louis Friedman • Nancy Orchard • Marcio Nava 	May 23, 2021 – June 9, 2021	27
Interested Members of the Public			
AK1	Abbes Khani	March 23, 2021	1
AK2		March 25, 2021	1
AK3		June 3, 2021	2
AA	Alan Archer	June 9, 2021	5
AI1	Alan Israel	March 24, 2021	7
AI2		June 9, 2021	6
AR	Allen Rubin	May 25, 2021	1
AY	Amy Yick	June 9, 2021	2
ABC1	Anita & Bob Caplan	June 8, 2021	1
ABC2		June 8, 2021	1
AMG	Ann & Marty Gallagher	June 8, 2021	3
AC1	Ann Cheung	April 13, 2021	4
AC2		June 6, 2021	5
AW	Ann Wolfson	June 10, 2021	43
AN1	Anonymous/Unknown	April 3, 2021	4
AN2		May 23, 2021	1
AN3		May 23, 2021	1
AN4		May 24, 2021	11
AN5		June 8, 2021	2
AN6		June 10, 2021	2

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Comment ID	Name of Commenter	Date Received	Number of Comments
AT	April Telles	April 13, 2021	7
ABP	Arlene & Bob Pinzler	May 21, 2021	6
BE	Barbara Epstein	June 9, 2021	8
BP	Bonnie Pierce	June 9, 2021	1
BO	Brian Onizuka	April 4, 2021	1
BW1	Brian Wolfson	June 4, 2021	47
BW2		June 8, 2021	24
BW3		June 10, 2021	4
CP	Carl Paquette	June 10, 2021	4
CR	Cecilia Raju	June 9, 2021	4
CG	Charlene Gilbert	June 10, 2021	12
CI	Chiaki Imai	June 6, 2021 (sent by Jay Bichanich on June 9, 2021)	5
CK	Chikako Kashino	June 7, 2021	1
CKS	Chris & Kristy Sullivan	June 2, 2021	4
CT	Chris Tuxford	April 22, 2021 (provided by phone to Charlie Velasquez)	1
CO	Colleen Otash	May 26, 2021	1
CC	Conna Condon	March 10, 2021	2
DR	Dan Rogers	April 28, 2021	1
DG	Dana Grollman	June 8, 2021	7
DF	Dean Francois	June 10, 2021	7
DV	Delia Vechi	June 10, 2021	11
DH1	Diane Hayashi	June 10, 2021	2
DH2		June 10, 2021	1
EA	Edward Armn	June 10, 2021	9
EN	Elisa Nye	March 24, 2021	5
ES	Elisabeth Schneider	June 6, 2021	2
FB1	Frank Briganti	May 22, 2021	8
FB2		June 9, 2021	11
FVC	Frank Von Coelln	June 10, 2021	5
FF1	Fred Fasen	April 12, 2021	3
FF2		May 26, 2021	3
GD	Gary Dyo	June 6, 2021	5
GPA	George & Pam Afremow	June 10, 2021	6
GP1	George Parker	March 14, 2021	3
GNV1	Glen & Nancy Yoko	June 4, 2021	3

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Comment ID	Name of Commenter	Date Received	Number of Comments
GNY2		June 10, 2021	8
GDV	Grace DuVall	June 10, 2021	3
GP2	Greg Podegracz	April 13, 2021	4
HRP	Hamant & Robin Patel	May 17, 2021	4
JH	Jack Holman	May 25, 2021	1
JE1	Jackie Ecklund	June 2, 2021	17
JE2	James Ecklund	June 9, 2021	4
JB1	Jay Bichanich	June 9, 2021	4
JS1	Jaysen Surber	June 4, 2021	1
JW	Jeff Widmann	March 21, 2021	3
JS2	Jennifer Sams	April 13, 2021	6
JM	Jim Mooney	March 30, 2021	4
JL	Jingyi Li	June 9, 2021	6
JD1	Joan Davidson	June 10, 2021	2
JD2		June 10, 2021	14
JHRC	Josephine Hrzina & Richard Crisa	March 24, 2021	1
JV	Josey Vanderpas	June 9, 2021	2
JS3	Joyce Stauffer	May 27, 2021	13
JC	Joyce Choi	June 6, 2021	1
JB2	Judith Bunch	June 10, 2021	2
JS4	Judith Scott	June 9, 2021	2
JK	Judy Kamp	June 2, 2021	1
JD3	Julie Dominguez	April 13, 2021	3
KY1	Kenneth Yano	June 10, 2021	15
KA	Kevin Ajamian	June 8, 2021	5
KY2	Kyung Yoon	June 6, 2021	4
LM	L. Mooney	April 9, 2021	3
LD1	Lara Duke	April 13, 2021	5
LD2		April 17, 2021	See Responses LD1-1 through LD1-5
LD3		June 6, 2021	8
LW	Laura Woolsey	May 26, 2021	1
LDZ	Laura D. Zahn	June 10, 2021	9
LAC	Leanne & Andy Clifton	March 24, 2021	2
LHPQ	Leanne Hill & Peter Quelch	June 7, 2021	5
LJZ	Linda & Joe Zelik	June 6, 2021	See Responses

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Comment ID	Name of Commenter	Date Received	Number of Comments
			GPA-1 through GPA-6
LK	Linda Kranz	June 9, 2021	7
LY	Lisa Youngworth	March 24, 2021	2
LH2	Lyndon Hardy	June 3, 2021	6
MB1	M. Burschinger	May 26, 2021	1
MCG	Marcia & Carl Gehrt	June 8, 2021	6
MG1	Marcie Guillermo	March 24, 2021	6
MG2		June 10, 2021	4
MB2	Maren Blyth	June 9, 2021	3
MS	Maria Schneider	June 6, 2021	3
MN1	Mark Nelson	March 10, 2021	1
MN2		March 22, 2021	1
MN3		March 22, 2021	3
MN4		March 24, 2021	1
MN5		March 24, 2021	1
MN6		March 24, 2021	1
MN7		March 24, 2021	1
MN8		March 25, 2021	1
MN9		March 25, 2021	1
MN10		March 25, 2021	1
MN11		March 25, 2021	1
MN12		March 26, 2021	1
MN13		March 29, 2021	1
MN14		April 2, 2021	1
MN15		April 4, 2021	1
MN16		April 4, 2021	1
MN17		April 4, 2021	1
MN18		April 5, 2021	2
MN19		April 6, 2021	1
MN20		April 6, 2021	6
MN21		April 6, 2021	1
MN22		April 6, 2021	1
MN23		April 6, 2021	8
MN24		April 6, 2021	1
MN25		April 6, 2021	36
MN26		April 11, 2021	1
MN27		April 13, 2021	13

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Comment ID	Name of Commenter	Date Received	Number of Comments
MN28		April 14, 2021	1
MN29		April 16, 2021	1
MN30		April 17, 2021	6
MN31		April 17, 2021	1
MN32		April 17, 2021	1
MN33		April 26, 2021	1
MN34		April 26, 2021	6
MN35		April 28, 2021	1
MN36		April 28, 2021	1
MN37		April 29, 2021	1
MN38		April 29, 2021	1
MN39		April 30, 2021	1
MN40		April 30, 2021	1
MN41		April 30, 2021	1
MN42		May 3, 2021	1
MN43		May 4, 2021	1
MN44		May 4, 2021	1
MN45		May 6, 2021	1
MN46		May 6, 2021	1
MN47		May 6, 2021	1
MN48		May 6, 2021	1
MN49		May 6, 2021	1
MN50		May 6, 2021	1
MN51		May 6, 2021	1
MN52		May 6, 2021	1
MN53		May 6, 2021	1
MN54		May 6, 2021	1
MN55		May 6, 2021	1
MN56		May 6, 2021	1
MN57		May 6, 2021	1
MN58		May 6, 2021	1
MN59		May 6, 2021	13
MN60		May 6, 2021	1
MN61		May 6, 2021	1
MN62		May 8, 2021	1
MN63		May 8, 2021	1
MN64		May 10, 2021	1
MN65		May 11, 2021	1

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Comment ID	Name of Commenter	Date Received	Number of Comments
MN66		May 12, 2021	1
MN67		May 12, 2021	1
MN68		May 12, 2021	1
MN69		May 14, 2021	12
MN70		May 15, 2021	14
MN71		May 15, 2021	1
MN72		May 15, 2021	1
MN73		May 16, 2021	1
MN74		May 16, 2021	1
MN75		May 16, 2021	3
MN76		May 17, 2021	1
MN77		May 17, 2021	1
MN78		May 17, 2021	1
MN79		May 17, 2021	1
MN80		May 17, 2021	1
MN81		May 20, 2021	1
MN82		May 20, 2021	1
MN83		May 20, 2021	1
MN84		May 23, 2021	1
MN85		May 24, 2021	1
MN86		May 24, 2021	3
MN87		May 25, 2021	10
MN88		May 25, 2021	1
MN89		May 27, 2021	1
MN90		May 27, 2021	1
MN91		May 27, 2021	1
MN92		May 27, 2021	1
MN93		May 28, 2021	1
MN94		May 28, 2021	1
MN95		May 29, 2021	1
MN96		June 1, 2021	1
MN97		June 1, 2021	1
MN98		June 1, 2021	1
MN99		June 1, 2021	1
MN100		June 2, 2021	1
MN101		June 4, 2021	4
MN102		June 4, 2021	1
MN103		June 5, 2021	3

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Comment ID	Name of Commenter	Date Received	Number of Comments
MN104		June 5, 2021	1
MN105		June 5, 2021	1
MN106		June 6, 2021	20
MN107		June 7, 2021	8
MN108		June 8, 2021	4
MN109		June 8, 2021	1
MN110		June 9, 2021	1
MN111		June 9, 2021	1
MN112		June 9, 2021	2
MN113		June 10, 2021	1
MN114		June 10, 2021	1
MN115		June 10, 2021	4
MN116		June 10, 2021	1
MN117		June 10, 2021	3
MN118		June 10, 2021	4
MN119		June 10, 2021	1
MN120		June 10, 2021	1
MN121		June 10, 2021	1
MN122		June 10, 2021	1
MN123		June 10, 2021	1
MN124		June 10, 2021	1
MN125		June 10, 2021	1
MN126		June 10, 2021	1
MN127		June 10, 2021	1
MR	Mark Razavi	March 25, 2021	1
MLE	Mary L. Eninger	June 8, 2021	1
ME	Mary Ewell	June 10, 2021	14
MG3	Mary Gaye	April 18, 2021	1
MG4		June 9, 2021	1
MW1	Mary Watkins	May 1, 2021	4
MLW	Mike & Laura Woolsey	June 8, 2021	1
MJ	Mike Jamgochian	March 23, 2021	4
MP	Mike Patel	April 5, 2021	2
MW2	Mike Woolsey	May 26, 2021	1
MW3		June 3, 2021	1
MT1	Mirna Trujillo	May 11, 2021	1
MT2		June 2, 2021	1
NO	Naomi Onizuka	April 4, 2021	1

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Comment ID	Name of Commenter	Date Received	Number of Comments
PA	Pam Absher	June 10, 2021	1
PB	Patricia Brown	June 5, 2021	4
PW	Patrick Wickens	April 13, 2021	1
PS	Paul Schlichting	June 10, 2021	9
PBK1	Phil & Barbara Kiyokane	March 24, 2021	2
PBK2		June 3, 2021	4
PDW	Philip de Wolff	June 4, 2021	7
RPQ	Randy & Pamela Quan	June 8, 2021	1
RF	Reid Fujinaga	March 24, 2021	1
RL	Robert Levy	April 13, 2021	1
RTGG1	Rosann Taylor & Geoff Gilbert	April 6, 2021	1
RTGG2		May 5, 2021	1
RT	Rosann Taylor	June 10, 2021	1
RV	Rose Valeriano	April 13, 2021	2
SK1	Sabrina Kerch	June 10, 2021	1
SK2	Sang Kim	June 3, 2021	4
SL1	Sheila Lamb	April 2, 2021	1
SL2		April 2, 2021	1
SL3		April 13, 2021	4
SL4		June 9, 2021	7
SW1	Shirley Wang	June 7, 2021	2
SW2	Simona Wilson	April 8, 2021	1
SGD	Stephanie & Gary Dyo	April 13, 2021	6
SD	Stephanie Dyo	June 6, 2021	5
SI1	Stephanie Ishioka	June 4, 2021	3
SI2		June 4, 2021	2
SJC	Stephen J. Curwick	June 10, 2021	5
SJ	Susan Johnson	May 24, 2021	1
SK3	Susan Kawamoto	April 28, 2021	2
SY	Susan Yano	June 10, 2021	25
TT	Terry Thomas	May 16, 2021	1
TO1	Tim Ozenne	April 5, 2021	1
TO2		April 6, 2021	1
TO3		May 25, 2021	1
TO4		May 26, 2021	7
TC	Tiya Choi	April 17, 2021	1
VM	Virginia Minami	April 17, 2021	1
WC	Warren Croft	May 1, 2021	5

Comment ID	Name of Commenter	Date Received	Number of Comments
WBJYJL	Wei, Brianna, and Jonathan Yu and Joyce Li	June 7, 2021	1
WS	Wendy Spadaro	June 7, 2021	3
WVS	William & Vivian Shanney	May 24, 2021	3
WK	William Kelley	June 9, 2021	4
Oral Comments			
MC	Melanie Cohan	March 24, 2021	4
CC	Craig Cadwallader	March 24, 2021	3
SY	Susan Yano	March 24, 2021	5
F	Fred	March 24, 2021	1
MN1	Mark Nelson	April 13, 2021	6
GG	Geoff Gilbert	April 13, 2021	4
SL	Sheila Lamb	April 13, 2021	4
SK	Sabrina Kerch	April 13, 2021	3
FVC	Frank von Coelln	April 13, 2021	2
M	Michael	April 13, 2021	2
AW1	Ann Wolfson	April 13, 2021	1
SY	Susan Yano	April 17, 2021	7
AW2	Ann Wolfson	April 17, 2021	3
MN2	Mark Nelson	April 17, 2021	4
BE	Brianna Egan	April 17, 2021	4
BW	Brian Wilson	April 17, 2021	1
TO	Tim Ozenne	April 17, 2021	2

8.2 MASTER COMMENT RESPONSES

BCHD received a number of similar comments on the Draft EIR, expressing common issues among those submitting written and/or oral comments. To address these common issues, Master Comment Responses were prepared for recurrent topics. The Master Comment Responses provide a means of addressing overarching issues in a more concise manner than providing repetitive responses to individual comments. In some cases, an individual comment may be answered by one or more Master Comment Responses. The Master Comment Responses are presented in this section to supplement individual responses to similar comments. Many individual responses presented below also rely on and cross-reference all or portions of the Master Comment Responses in the individual response to comment.

This section presents the Master Comment Responses, as follows:

8.2.1 Master Response 1 – General Opposition to the Project

Several commenters have used the Draft Environmental Impact Report (EIR) comment period as a forum to express disapproval of and/or opposition to the proposed Healthy Living Campus Master Plan (Project) without commenting on the adequacy or technical sufficiency of the environmental impact analysis, mitigation measures, and/or alternatives presented in the EIR. Although not germane to the adequacy of the EIR, as discussed below, these comments have not been rejected (California Environmental Quality Act [CEQA] Guidelines Section 15204[e]). Instead, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project. However, as discussed below, such comments do not address environmental issues, which are the focus of this CEQA-compliant EIR.

CEQA Guidelines Section 15105 requires a 45-day comment public review period for a Draft EIR; however, given the ongoing COVID-19 pandemic and in an interest to facilitate increased levels of public participation, the Beach Cities Health District (BCHD) extended the comment period to 90 days in order to ensure the public had ample time to review and comment. As required by CEQA, during this period BCHD received comments from persons who reviewed the Draft EIR. CEQA Guidelines Section 15204 defines the suggested focus of the review:

“In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

As described in CEQA Guidelines Section 15151, “...an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR

is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure” (San Francisco Ecology Center v. City and County of San Francisco, (1975) 48 Cal. App. 3d 584).

Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.). Comments regarding the environmental issues presented in the Draft EIR have been responded to in detail within these responses to comments. Text revisions to the Draft EIR have also been included in the Final EIR in response to comments.

This EIR serves to provide a primary source of environmental information for the BCHD Board of Directors and responsible agencies exercising any permitting authority or approval power directly related to implementation of the proposed Project. However, it is not the purpose of an EIR to recommend approval or denial of the proposed Project. In fact, in order to provide the BCHD Board of Directors, responsible agencies, and interested members of the public with options for consideration, the EIR identifies a reasonable range of alternatives that would substantially reduce or avoid potentially significant impacts as compared to the proposed Project. In particular, the EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only, which is the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), as a means to further reduce potential impacts and address public concerns, at least in part, over the size and scope of the proposed Project. Further, it should be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

8.2.2 Master Response 2 – BCHD as Lead Agency

assume lead agency status. As a matter of law BCHD, has the authority and duty to assume lead agency status pursuant to CEQA because it is the public agency with principal responsibility for carrying out the proposed Project (CEQA Guidelines Section 15367). It is irrelevant to this

determination that BCHD must apply to another public agency with land use jurisdiction over the Project site for a secondary approval. Such agencies, which have approval authority but do not have principal responsibility for carrying out the proposed Project, are defined by CEQA Guidelines as responsible agencies.

CEQA Guidelines Sections 15050-15053 govern how the lead agency is determined. Pursuant to CEQA Guidelines Section 15051:

“Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:

(a) If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency.”

Although the Project site is located in the City of Redondo Beach, the proposed Project would be approved and implemented, hence, carried out, by BCHD. For example, the BCHD Board of Directors has the responsibility for approving the proposed Healthy Living Campus Master Plan and implementing the proposed development, including approval of building demolition, construction of new buildings and associated improvements, and operation of the community health facilities, all in compliance with the proposed Healthy Living Campus Master Plan and State law. The only other agencies with responsibilities for discretionary approvals for the proposed Project are the City of Redondo Beach (Design Review and CUP) and possibly the City of Torrance (related to activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way). Ministerial State licenses would also be needed to operate some of the facilities (e.g., proposed Assisted Living program, which are regulated by U.S. Department of Health and Human Services along with the California Department of Social Services). It is typical for larger projects to involve permitting by multiple agencies, and the CEQA Guidelines anticipate that this will often be the case, which is why the role of the responsible agency, which applies to these agencies, was created and is defined in CEQA Guidelines (CEQA Guidelines Section 15096 and 15381).

In addition, CEQA Guidelines Section 15053(a) discusses designation of a lead agency when there are multiple responsible agencies:

“If there is a dispute over which of several agencies should be the lead agency for a project, the disputing agencies should consult with each other in an effort to resolve the dispute prior to submitting it to the Office of Planning and Research. If an agreement cannot be

reached, any of the disputing public agencies, or the applicant if a private project is involved, may submit the dispute to the Office of Planning and Research for resolution.”

There is no dispute between BCHD and any other agency with regard to which agency should be the lead agency to prepare the Draft EIR for the proposed Project; neither the City of Redondo Beach nor the City of Torrance have asserted lead agency status. Moreover, members of the public are not authorized under the CEQA Guidelines to request the Office of Planning and Research (OPR) to get involved in the designation of a lead agency. Rather, “*dispute*,” for purposes of asking OPR to designate a lead agency, is defined as “...*a contested, active difference of opinion between two or more public agencies as to which of those agencies shall prepare any necessary environmental document*” (CEQA Guidelines Section 15053[b]). Again, there is no such contested, active difference of opinion regarding lead agency status between BCHD, the City of Redondo Beach, the City of Torrance, or any other State or local agencies.

8.2.3 Master Response 3 – Project Need and Benefit

Several commenters have stated that there is no real need for senior housing in the Beach Cities and the real objective of the proposed Project is a simple want to generate revenue for the Beach Cities Health District (BCHD). Many of these commenters have stated that seniors prefer to live in their own homes with access to in-home care. Additionally, many commenters have suggested that the Beach Cities and the surrounding communities are already served by a Program for All-Inclusive Care for the Elderly (PACE) and that the provision of such a program as a part of the proposed Healthy Living Campus Master Plan would be duplicative with these existing services. Finally, many of the commenters have contended that there are no seismic hazards or that the issue is overstated and does not need to be addressed as a part of the proposed Project.

However, as discussed under Master Response 1 – General Opposition to the Proposed Project, these comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Rather, these comments express the opinions of the commenters regarding need and benefits of the proposed Project, a matter that has been subject to extensive review and public discussion by BCHD. As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach and Manhattan Beach as well as tens of thousands within other South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. BCHD expended considerable time and effort researching and evaluating anticipated

community health needs in the coming decades, particularly with regard to senior care. The matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, this need for the proposed Project has been discussed in detail at numerous well-noticed public hearings. After careful consideration of projected community health needs over the coming decades, the BCHD Board of Directors identified the proposed Project as a key component to addressing future community health needs and drafted a set of project objectives, which helped define those health needs and project benefits which guided project design. As described in CEQA Guidelines Section 15093, “*CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project.*” If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall “*...state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record*” (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

The Need for Senior Housing

As noted above, several commenters have questioned the need for senior housing, while not providing substantial evidence to support such assertions. As discussed further below, BCHD has expended considerable time and effort to research and document projected senior housing needs and to develop a proposed Project, which reflects these anticipated needs and demand. As described in Section 2.4, *Project Objectives*, the proposed Project would “[a]ddress the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces.” The proposed creation of 157 new Assisted Living units is consistent with the Redondo Beach General Plan Housing Element, which aims to enhance existing housing stock and expand housing opportunities for residents (refer to Section 3.12, *Population and Housing*). For example, the proposed Project would be consistent with Policy 5.2, which specifically aims to provide housing that meets the special needs of seniors and the disabled.

In order to ensure that community health needs are met, BCHD commissioned a Market Feasibility Study by MDS Research Company, Inc. to assess projected future community health needs and the demand for the proposed Assisted Living and Memory Care units. As described in the study,

the demand modeling is conservative, realistic, and gives consideration to all of the relevant key factors and assumptions with regard to this very specialized type of living arrangement. For example, the study assesses the potential market for the Assisted Living program by identifying the number of households with persons ages 75+, but conservatively excludes the number of households headed by a person who is not age 75+ (e.g., adult children, relatives, etc.) that could reasonably provide in-home care. The study also screens out those persons ages 75+ who reside in group quarters, nursing homes, or other institutionalized settings that already provide in-home care. Within that potential market for the Assisted Living program, the study considers the estimated need for assistance with the daily living activities (e.g., bathing, dressing, etc.) – exclusive of income qualification and consideration of existing competitive service offerings. This potential market was then adjusted to include only those income-qualified households based on annual after-tax cash flow income alone – exclusive of economic support by children and spend-down of assets. Accounting for existing and planned senior housing communities in the vicinity of the Project site, the 2019 Market Feasibility Study concluded that the proposed Assisted Living units and Memory Care units are needed, would meet an important community health need, and would be filled following the completion of the proposed Residential Care for the Elderly (RCFE) Building described for the Phase 1 preliminary site development plan.

The Need for Program of All-Inclusive Care for the Elderly (PACE) Medical Services

BCHD has also conducted exhaustive research regarding assistance for seniors who choose to remain in their own home, but require substantial support to do so. In fact, several commenters voicing opposition to the Assisted Living program component of the proposed Project have cited this need. As described in Section 2.0, *Project Description*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services to older adults – involving a combination of adult day care center services and in-home care services. PACE is intended to allow older adults to remain in the community rather than receive care in an Assisted Living facility. As described in Section 2.0, *Project Description* and as shown on the National PACE Association website, there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located within any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

Seismic Safety of the Beach Cities Health Center and Beach Cities Advanced Imaging Center

Several commenters have asserted that the older buildings on the BCHD campus are not in danger of damage from seismic activity; however, they have neither directly contested the findings of the

geotechnical studies prepared by registered professional geologists Nabih Yousef Associates nor submitted substantial evidence to support such claims.

As described in Section 2.1, *Introduction* and Section 2.4.2, *Project Background*, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This *Beach Cities Health District Seismic Assessment* is referenced in the EIR in Section 7.0, *References* and is publicly available at [https://www.bchdcampus.org/sites/default/files/archive-files/January-2018-Nabih-Youssef-and-Associates-Presentation CWG.pdf](https://www.bchdcampus.org/sites/default/files/archive-files/January-2018-Nabih-Youssef-and-Associates-Presentation-CWG.pdf). This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the *Beach Cities Health District Seismic Assessment* and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). For example, as described, as described in Section 3.6, *Geology and Soils*, “[t]he Beach Cities Health Center, formerly the South Bay Hospital, is a 60-year-old, non-ductile concrete building. The original 4-story (north) tower was constructed in 1958 and the 4-story addition (south tower) was constructed in 1967. Both of these towers were constructed with non-ductile concrete roofs, floors, and poorly reinforced columns, making them susceptible to collapse in the event of an earthquake.” These buildings were designed and constructed in conformance with building code requirements at the time of construction; however, the building code requirements have since evolved substantially based on research, best practices, and experience from previous earthquakes. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

The EIR acknowledges that the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD’s mission (refer to Section 2.4.2, *Project Background*). Revenues from the long-term tenant leases support BCHD community health programs and services, such as the Community Services program, the Center for Health and Fitness, and the Beach Cities

Partnership for Youth. However, BCHD’s ability to attract tenants has diminished in recent years, in part because of the specialized nature of the former South Bay Hospital Building, which cannot be easily renovated to conform to tenant needs. Therefore, even if simply seismically retrofitting the Beach Cities Health Center were financially feasible, it would not address these additional issues associated with providing purpose-built facilities for outpatient medical services and other community health and wellness needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD’s mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD’s community health and wellness programs and services.

8.2.4 Master Response 4 – Project Objectives

Many commenters have suggested that the project objectives stated in the Draft Environmental Impact Report (EIR) are contrived in way to only support the proposed Healthy Living Campus Master Plan and that they do not support the community health and wellness mission of the Beach Cities Health District (BCHD). However, as discussed in more detail below, the project objectives directly reflect BCHD’s primary mission to support community health and wellness by providing needed housing and long-term care to seniors as well as generating revenue to support BCHD’s broader range of community health programs and services.

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15124(b) the objectives of a project are intended to “...*help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.*” As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population

within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD's programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD's continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use spaces (e.g., Center for Health and Fitness, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

The project objectives presented in Section 2.4.3, *Project Objectives* accurately describe the underlying purpose of the proposed Project. For example, Project Objective 1 describes that the one of the purposes of the proposed Project is to eliminate seismic safety and other hazards of the former South Bay Hospital Building. The financial drivers of the proposed Project, which are clearly linked to BCHD's ability to provide community health and wellness services, are also plainly stated in Project Objective 2 (Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services). Project Objective 6 (Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs) is also clearly linked to BCHD's primary mission to continue providing high-quality community health programs and wellness programs and services. As described at length in the EIR, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. These revenues from the long-term tenant leases support existing BCHD community health and wellness programs and services provided to BCHD's service population of more than 123,000 people within Redondo Beach, Hermosa Beach and Manhattan Beach as well as tens of thousands within other South Bay communities. The combined cost of a seismic retrofit and renovations necessary to continue to attract mission-oriented tenants would render such a dual undertaking economically infeasible, especially if done without the revenue generated by the existing tenants in the Beach Cities Health Center. Additionally, Project Objectives 3, 4, and 5 describe the purposes of the proposed Project to provide flexible, multi-use spaces and specialized facilities to support the BCHD innovative and constantly evolving programs necessary to serve the future needs of the community. Specifically, these project objectives describe that the proposed Project is intended to provide public open space, integrated assisted living facilities, and a modern campus with meeting spaces for public gatherings and interactive education.

The project objectives presented in the EIR clearly meet the requirements of CEQA Guidelines Section 15124(b). It should also be noted that these project objectives have been appropriately used to develop a range of feasible alternatives that would substantially reduce significant impacts associated with the proposed Project while still accomplishing most of the basic project objectives (refer to Section 5.0, *Alternatives*). The EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only as the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), because it would reduce the total duration of the significant and unavoidable construction-related noise impact. This alternative would also incorporate an alternative circulation scheme that would avoid any potential conflicts associated with vehicle access along Flagler Lane. Further, this alternative addresses public concerns, at least in part, over the size and scope of the proposed Project.

8.2.5 Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units

Some commenters have stated an opinion on the cost and affordability of the Assisted Living units and Memory Care units that would be provided in the proposed Residential Care for the Elderly (RCFE) Building. While this is not an environmental issue and not germane to the adequacy of the Environmental Impact Report (EIR), because of the potential relationship to population and housing issues, the results of the three detailed market studies prepared by BCHD are summarized below.

BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three detailed market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach. These market studies can be found in their entirety at the Beach Cities Health District (BCHD) website here: <https://www.bchdcampus.org/campus>. Field work and analyses were originally completed in April 2016, updated in August 2018, and updated again May 2019 to reflect the revised number and type of senior housing units included in the proposed Project.

Each of prepared studies – which identified monthly service fee price ranges using existing market rates – concluded that there is sufficient size and depth of the qualified target market to introduce the proposed number of senior housing units. As described in the May 2019 study, the rationale behind the income qualifying criteria is based on the assumption that seniors typically spend 40 to 45 percent of their annual cash flow income on market rate monthly fees for service-free or service-optional independent living, 65 to 70 percent for market rate monthly service fees or rental rates for service-enriched independent living, 75 to 80 percent for assisted living monthly service fees, and 85 to 90 percent for Alzheimer’s/memory care or nursing/health care. The analysis identifies

that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area.

At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. Cain Brothers also compared the pricing levels in the MDS market study with the actual monthly fees at the existing Silverado Memory Care Facility on the BCHD campus and the Sunrise Assisted Living Facility in Hermosa Beach and verified the reasonableness of the proposed pricing level. Since the 2019 study, the number of proposed Assisted Living units and Memory Care units has been updated again and a pricing schedule has not yet been determined. However, the pricing of the proposed senior living units will ultimately be consistent with prevailing market rates.

8.2.6 Master Response 6 – Financial Feasibility/Assurance

Several commenters stated that the description of the proposed Project and/or the environmental impact analysis provided within the Environmental Impact Report (EIR) should include a quantification of economic characteristics including a rigorous quantification of the Beach Cities Health District (BCHD) economic characteristics, evaluation of development financing strategy, profit analyses, financial error analyses, etc. Many commenters asserted that due to the cost of the units, they would not be filled following the completion of construction, the proposed Project would fail to generate sufficient revenue, and the proposed Project may ultimately fail. As described further below, although economics is not generally recognized as an environmental issue under CEQA, BCHD has expended substantial effort on studies to document the economic characteristics of the proposed Project and their relationship to provision of community health and wellness programs and services to the residents of the Beach Cities and the nearby South Bay communities; these studies and presentation materials can be found here: <https://www.bchdcampus.org/campus>.

These comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. While the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail*

beyond that needed for evaluation and review of the environmental impact” (CEQA Guidelines Section 15124). CEQA Guidelines Section 15131, also specifically states “[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.”

CEQA requires that a lead agency determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record, and “...evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence” (Public Resources Code Article 11, Section 21082.2[c]). Commenters concerned with the economic and financial capabilities of BCHD appear to assert that the EIR must include analysis of the economic characteristics of the proposed Project, including the ability or inability of BCHD to fund and implement the proposed improvements. However, these issues are not directly associated with the physical impacts on the environment. As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR. Further, assertions that BCHD would be unable to fund the proposed Project, that the proposed Project would fail financially, or that that foreclosure of the property and inability to complete the proposed Project following initiation of construction activities would result in environmental damages and loss of public land are unsubstantiated, not supported by substantial evidence in the record, and were therefore deemed speculative. CEQA Guidelines Section 15384[a] states that “[s]ubstantial evidence does not include ‘argument, speculation, unsubstantiated opinion or native, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are caused by physical impacts on the environment’”

It is worth noting that BCHD has very clearly and consistently demonstrated that the funding necessary to implement the proposed Phase 1 preliminary site development plan, which is anticipated to cost \$235 million, is secured. These funds consist of revenue generated by property assessments, BCHD’s health and fitness facilities, and tenant space within the Beach Cities Health Center, as well as leases, partnerships, grants. As described in Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, Cain Brothers reviewed this development strategy. The results of this review have been discussed at numerous well-noticed public meetings and the complete analysis can be found in their entirety here: https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20

Analysis 2020.pdf. While funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the Residential Care for the Elderly (RCFE) Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory Care community as well as the Program of All-Inclusive Care for the Elderly (PACE) within the RCFE Building. In addition, BCHD would continue to be able to seek and secure appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

8.2.7 Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation

The issue of whether the proposed Project is appropriate for a parcel with a P-CF (Community Facility) zoning and land use designation has been raised by a number of commenters. Several of these comments have suggested that BCHD is proposing a market-rate, for-profit facility and that land zoned as P-CF (Community Facility) should not be used for private development enterprises that belong in commercial zones.

The existing Beach Cities Health District (BCHD) campus is designated as P (Public or Institutional) by the Redondo Beach General Plan and zoned as P-CF (Community Facility) under the Redondo Beach Zoning Ordinance. The P designation is comprised of lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. Specific purposes of the P (Public and Institutional) zone regulations are to provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted on P-CF zones with a conditional use permit (CUP). A CUP is already in place for the Beach Cities Health Center located

at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory Care Community. The proposed Project – like other improvements made on the BCHD campus in the past – would require a CUP under existing code. As described in RBMC Section 10-2.1116 the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes.

8.2.8 Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis

Several comments on the Draft Environmental Impact Report (EIR) question the use of a programmatic analysis for the Phase 2 development program described in the proposed Healthy Living Campus Master Plan. These comments assert that the description of the Phase 2 development program is vaguely defined and not analyzed to an appropriate level of detail. However, CEQA specifically allows for such programmatic analysis, particularly for phased projects, and the EIR closely adheres to CEQA guidance on such matters as described further below.

As discussed in Section 1.1, *Overview*, the Environmental Impact Report (EIR) evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. The complete description of both the Phase 1 preliminary site development plan and the Phase 2 development program is provided in Section 2.5, *Proposed BCHD Healthy Living Campus Master Plan*, and is based upon the published version of the Healthy Living Campus Master Plan prepared by Paul Murdoch Architects under the direction of the Beach Cities Health District (BCHD). The Healthy Living Campus Master Plan is publicly available here: <https://www.bchdcampus.org/campus>.

This approach to analysis is not uncommon, and is in fact specifically called for under California Environmental Quality Act (CEQA) Guidelines Section 15165:

“Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of

several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect.”

Guidance on the preparation of EIRs that analyze projects at both a project level of detail, and a programmatic level of detail is provided under Article 11 of CEQA Guidelines. Specifically, CEQA Guidelines Section 15160 states that there are “...a number of examples of variations in EIRs as the documents are tailored to different situations and intended uses. These variations are not exclusive... [and] Lead Agencies may use other variations consistent with the Guidelines to meet the needs of other circumstances.” A project EIR is defined as “[a] type of EIR [that] should focus primarily on the changes in the environment that would result from the development project” (CEQA Guidelines Section 15161), while a program EIR is defined as “...an EIR which may be prepared on a series of actions that can be characterized as one large project and are related...” (CEQA Guidelines Section 15168). Generally, a program EIR analyzes a project for which less specific detail is currently known, but would be developed at a later date. If, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “tiered” CEQA analysis of the proposed Phase 2 improvements, as needed, which would involve “...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Such is the case for Phase 2 of the proposed Project, for which a single detailed preliminary site development plan and construction information has not yet been developed. This is due to two primary factors: 1) as described in Section 2.0, *Project Description*, the Phase 2 development program would be implemented at least 5 years after the development under Phase 1; and 2) the programming in Phase 2 and the associated development is intended to respond to the Community Health Report and priority-based budgeting efforts to meet constantly evolving community health and wellness needs in the Beach Cities and the nearby South Bay communities. As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and

maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan. This approach is often used by lead agencies – including local municipalities – when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans existing for later improvements. There are several advantages that can be attributed to this approach, including allowing for “...*the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts*” (CEQA Guidelines Section 15168[b][4]). In the event that later “*tiered*” analysis is determined necessary for the Phase 2 improvements, the lead agency “...*shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program*” (CEQA Guidelines Section 15168[c][3]).

With regard to analysis of the potential impacts of proposed Phase 2 improvements, particularly with regard to analysis of aesthetic and visual resource impacts, the EIR includes an appropriate level of detail necessary to inform the range of potential impacts and programwide mitigation measures consistent with the requirements of CEQA. For instance, the analysis of aesthetics and visual resources impacts in Section 3.1, *Aesthetics and Visual Resources*, provides visual simulations for three separate example Phase 2 site plan scenarios for illustrative purposes and to help inform the programmatic analysis. However, as noted in the analysis, due to uncertainties in the ultimate programming and site plan associated with the Phase 2 development program, the potential impacts to visual character and quality of public views in Phase 2 are discussed programmatically. The EIR depicts these three example site plan scenarios under Impact VIS-2, and provides detailed discussion as to where the proposed improvements would be visible to the public and how these improvements may obstruct or otherwise affect existing views. While the EIR does not include photosimulations such as those provided for the Phase 1 improvements, precise photosimulations are not mandatory for determining the potential impacts or mitigation measures applicable to the Phase 2 development program. As previously described, preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements. It should also be noted that the proposed development under Phase 2 – like any other improvements made on the BCHD campus – would be subject to a Planning Commission Design Review (Redondo Beach Municipal Code [RBMC] Section 10-2.1116).

8.2.9 Master Response 9 – Aesthetics and Visual Resources Analysis

Numerous comments received on the Draft Environmental Impact Report (EIR) – particularly those received from adjacent property owners in the single-family residential neighborhood to the

east within the City of Torrance – involve or are related to the aesthetics and visual resources analyses. In particular these comments assert that the bulk, scale, and mass of the development described for the proposed Healthy Living Campus Master Plan is too large and would result in adverse impacts related to existing views from single-family neighborhoods, obstruction of open sky views, neighborhood compatibility, privacy, and shade/shadows.

The EIR thoroughly assesses the impacts associated with aesthetics and visual resources that could result from construction and operation of the proposed Project in Section 3.1, *Aesthetics and Visual Resources*. As described therein, the analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x, professional architects and visual simulation specialists, for the Phase 1 preliminary site development plan. Additionally, the analysis addresses representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. These photosimulations and representative views were reviewed in the context of CEQA as well as the relevant development standards and municipal code sections. Based on the comments received during the 30-day public scoping period, this discussion also includes an analysis of potential impacts related to shading of adjacent shadow-sensitive uses. A shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M). Under the California Environmental Quality Act (CEQA), aesthetic impacts are qualitative in nature, and generally occur where physical changes would conflict with adopted development standards and would substantially degrade the visual character or quality of public views of the site and its surroundings as set forth in Appendix G of the CEQA Guidelines.

Height and Size of the Proposed RCFE Building

The existing Beach Cities Health Center and medical office buildings on the Project site, which in range in height from 1 to 5 stories, represent the existing physical environmental setting of the Project site against which changes and potential Project impacts must be assessed. As described in Section 3.1, *Aesthetics and Visual Resources*, the former South Bay Hospital, which reaches a height of 76 feet above the existing ground level of the BCHD campus, was originally developed in 1958 and since that time has contributed to the overall character of the surrounding area, rising above the adjacent by low-rise commercial and multi-family residences to the north, single-family residences to the west, south, and east. The distinct façades of the buildings, with their white concrete columns and blue/black tinted windows that form horizontal stripes across the buildings, are highly visible from many adjacent public roads, sidewalks, and other public viewing locations. These buildings also provide a familiar sight for people in the immediate vicinity, including

residences that are located immediately adjacent to the existing Beach Cities Health District (BCHD) campus.

The development of the proposed Residential Care for the Elderly (RCFE) Building and subsequent demolition of the Beach Cities Health Center would result in a change in the existing views across the existing BCHD campus, replacing the existing highly visible structures with new structures of similar height, bulk, and scale. While the proposed development would be visible, views of the Project site would not change substantially from locations where intervening structures would obstruct the RCFE Building, such as along Tomlee Avenue (Representative View 1). While the building would be visible above the single-family homes, the overall intrusion into open sky views above these homes would be minor. Development of the RCFE Building also would not substantially alter views of the Project site from North Prospect Avenue (Representative View 5) due to the setback of the building from this location and proposed landscaping, which would partially obscure views of the interior of the campus. As shown in the comparison photographs and photosimulations in the discussion under Impact VIS-2, the proposed RCFE Building would be most visually prominent from Flagler Lane near Towers Street (Representative View 2) and Beryl Street (Representative View 3), and along Beryl Street in front of the Redondo Village Shopping Center (Representative View 4). Although the existing Beach Cities Health Center is highly visible or even visually dominant, the proposed RCFE Building would be substantially larger and more prominent than the existing structures on the BCHD campus. The environmental impact analysis provided in the EIR acknowledges that the proposed RCFE Building, when viewed from Representative Views 2, 3, and 4, would be located closer to the edges of the BCHD campus and would appear substantially taller with substantially more massing than the existing buildings on the campus as well as the other existing buildings.

As described under Impact VIS-2, the existing development on the BCHD campus is barely visible from Flagler Lane at Representative View 2. This view is primarily characterized by the open sky above the existing slope, retaining walls, and mature landscaped trees. The proposed RCFE Building would be visually prominent from this viewpoint, rising above the retaining walls and landscaping along eastern slope in the mid-ground. The proposed 6-story RCFE Building would be substantially larger than the existing 1- to 5-story buildings currently on-site as well as the adjacent 1- to 4-story buildings. The proposed RCFE Building would substantially reduce access to open sky from this view, and would change the visual character of this view from the public streets and sidewalks in the single-family residential neighborhood to the east as well as travelers along Flagler Lane and Towers Street. However, due to the location of the Project site along the northern perimeter of the BCHD campus, approximately half of the open sky view would remain. Further, the proposed landscaping surrounding the RCFE Building as well as along the eastern

border of the BCHD campus would provide intermittent large shade canopy trees and smaller shade trees. The landscaping would partially screen and would soften views of the RCFE Building from this location, particularly for the lower floors of the building. Therefore, although the height and mass of the proposed RCFE Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

From Representative View 3, views of the existing Project site are characterized by the vacant Flagler Lot, which is currently covered with gravel and weedy vegetation and is leased as a staging area for construction equipment. Any development on the vacant Flagler Lot would be characterized as a change, due to its undeveloped nature. Given the height of the proposed RCFE Building and its proposed location along the northern perimeter of the BCHD campus, the building would be visually prominent from this location. Nevertheless, the proposed Project would comply with applicable zoning and regulations governing scenic quality. The proposed buildings would comply with the required building height prescribed in Redondo Beach Municipal Code (RBMC) Section 10-2.622, and would provide visual interest with design elements that would add varied composition and texture to the proposed RCFE Building. The Phase 1 preliminary site development plan would enhance the street level character at the intersection of Beryl Street & Flagler Lane by providing flowering street trees and a tiered staircase facing Beryl Street, which would lead to the central area of campus. While the Phase 1 preliminary site development plan would remove existing on-site landscaping, the proposed development under Phase 1 would include new landscaping surrounding the RCFE Building as well as along the frontages with Flagler Lane and Beryl Street to provide shade and visual benefits associated with the dense canopy and foliage. The proposed landscaping as well as public views of and pedestrian passage to active green spaces located within the central campus area of the Project site would activate and improve the pedestrian character of Beryl Street. Further, views of the landscaped open air dining terrace atop the first floor of the RCFE Building would contribute to a more pedestrian friendly environment along Beryl Street by inviting visitors to the BCHD campus. Therefore, implementation of the Phase 1 preliminary site development plan would alter views, but would not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

Views of Beryl Street from Representative View 4 are characterized by the four travel lanes and wide pedestrian crosswalks as well as the large canopy trees adjacent to the pedestrian sidewalks on the south side of the street. Views of the Project site from this location include the existing 5-story Beach Cities Health Center and the upper west corner of the Providence Little Company of

Mary Medical Institute Building along with the large trees that border the northern perimeter of the Project site. Implementation of the Phase 1 preliminary site development plan would noticeably alter the existing views of the Project site from this location. The existing Redondo Village Shopping Center would form a step-down to the street level along Beryl Street. However, the environmental impact analysis provided in the EIR acknowledges that the location of the proposed RCFE Building along the northern perimeter of the Project site would result in additional bulk and mass when compared to the existing development on the BCHD campus. Therefore, the perceived height of the RCFE Building from the pedestrian perspective would be more pronounced from this location. (As described further in the neighborhood compatibility discussion below, it should be noted that the bulk and mass of the proposed RCFE Building was concentrated in this area of the BCHD campus in order to reduce the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance.)

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

In summary, development of the proposed RCFE Building would substantially alter existing views of and across the Project site from representative views surrounding the site. However, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

Compatibility with the Surrounding Neighborhood Character

As described in Section 1.6, *Project Background*, since the inception of the proposed Project in 2017, BCHD has been dedicated to engaging in public outreach, including forming a 20-person Community Working Group (CWG) to represent the various populations and organizations in the Beach Cities and engage local participants in the planning of proposed redevelopment. The proposed Project was developed as a result of more than 60 meetings hosted over a 3-year period and attended by more than 550 community members.

Community feedback received from such outreach efforts has helped guide revisions to the conceptual plans for the proposed Healthy Living Campus Master Plan, which was originally

released to the public in June 2017. The original site plan included a 6-level parking structure on the vacant Flagler Lot, a 7-story assisted living building, and a 4-story independent living building over 3 levels of parking. Community feedback was received on issues relating to building height, density of development, and the proximity of the proposed development to adjacent single- and multi-family residential land uses. To address these issues, the 2019 Master Plan refined the original conceptual plan by removing the proposed parking structure from the vacant Flagler Lot, relocation of the parking to the southeast corner of the BCHD campus, and reducing the height of the RCFE Building to 4 stories by wrapping the building footprint along the eastern boundary of the campus.

Following additional community outreach efforts for the 2019 Master Plan, including a second community Open House in March 2019 and five public scoping meetings in July 2019, BCHD received comments regarding the views of the proposed buildings from the surrounding residential neighborhoods. BCHD also received comments regarding potential construction-related impacts to neighbors, which included concerns over the duration of construction (i.e., three individual 3-year long phases spanning a period 15 years) as well as potential impacts related to air quality, hazards and hazardous materials, noise, and construction vehicle traffic given the adjacency of the RCFE Building to the single-family neighborhood to the east within the City of Torrance.

In response to the community's concerns described above, BCHD revised the footprint of the RCFE Building was further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would comply with the required building height prescribed in Redondo Beach Municipal Code (RBMC) Section

10-2.622, and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. While the design guidelines only apply to buildings and structures in the R-2, R-3, R-3A, RMD, RH-1, RH-2, and RH-3 multiple-family residential zones, they have been conservatively applied to the 217 Assisted Living units and Memory Care units proposed for the RCFE Building. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Aside from the subjective contention that the proposed RCFE Building would be out of place, none of the comments contest the consistency of the proposed Project with these policies, which are used as the threshold for impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*).

Shade and Shadow Effects from Proposed RCFE Building

As described under Impact VIS-4 in Section 3.1, *Aesthetics and Visual Resources*, the proposed 6-story RCFE Building would reach a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below. This would be the tallest building included in either Phase 1 or Phase 2 of the proposed Healthy Living Master Plan, casting shadows up to 404.5 feet long during the Winter Solstice. Therefore, the proposed Project would create longer and more extensive shadows than the existing buildings on the BCHD campus.

Shadow-sensitive land uses adjacent to the Project site consist of residential buildings, including windows and yards at most single-family residences, Towers Elementary School to the east, and Dominguez Park to the northeast. The shade and shadow study prepared for the proposed Project demonstrates that the adjacent residential structures in Torrance, including on Towers Street, Tomlee Avenue, Mildred Avenue and Redbeam Avenue, would be shaded beyond existing shadows, particularly during the Fall and Winter evenings, as a result of the development under Phase 1 and Phase 2 (see Appendix M). However, the vast majority of the residences in neighborhood to the east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the BCHD campus and the Torrance residences below.

The multi-family residential buildings adjacent to the north of the Project site would be shaded by the proposed RCFE Building beyond existing shadows during the early morning hours (i.e., 8:00 a.m. or earlier) in the Winter, due to the proximity of the residences to the Project site. However, by 10:00 a.m., the multi-family residences would not be shaded. Further, the proposed RCFE Building would not cast shadows over these residences in the Spring, Summer, and Fall (refer to Figure 3.1-3).

During the Fall and Winter, the proposed RCFE Building would also cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). The latest dismissal time for Towers Elementary School students is at 3:12 p.m. for 4th and 5th graders; however, and Towers Elementary School closes at 4:00 p.m. Therefore, shadows cast by the proposed RCFE Building would not have a significant adverse effect on Towers Elementary School.

Based on the shade and shadow study prepared for the proposed Project, the RCFE Building would also cast shadows along the southern edge of Dominguez Park during the evening hours (i.e., after 4:00 p.m.) in the Winter. However, the portion of Dominguez Park that would be shaded is comprised of a steep vegetated slope that does not provide any recreational opportunity and is fenced off from the rest of the park to the north. Consequently, the proposed Project would not generate shading that would affect shadow-sensitive receptors at Dominguez Park.

None of the shade and shadows impacts would exceed the thresholds established in the EIR, that a significant shade and shadow impact would occur “...if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).”

Privacy Comments Regarding the Proposed RCFE Building

As described in Section 3.1.3, *Impact Assessment and Methodology*, only public views, not private views, need be analyzed under CEQA. In 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views are not considered under CEQA (Public Resources Code Section 21082.2).

A number of public scoping comments addressed the issue of privacy for adjacent residential areas. While CEQA requires an assessment of impacts to public views rather than private views and privacy, the following discussion is provided for informational purposes in response to these comments. The existing campus, which was originally developed in 1958, currently provides views across the single-family residential neighborhood to the east as a result of the existing

topography (i.e., the campus ground level is approximately 30 feet higher than the ground level in the adjacent neighborhood). Many of the backyards in the first row of residences adjacent to the BCHD campus are visible from the fourth and uppermost floor of the Beach Cities Health Center under existing conditions. As described in Section 1.0, *Introduction*, the proposed RCFE Building would be sited along the northern perimeter of the BCHD campus behind the Redondo Village Shopping Center. This proposed siting located reduces the proposed building massing along the eastern boarder of the campus adjacent to the single-family residential neighborhood within the City of Torrance. While residential areas would still be visible from some areas of the BCHD campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

8.2.10 Master Response 10 – Air Quality Analysis

A large proportion of the comments received on the Draft Environmental Impact Report (EIR) – particularly those received from adjacent property owners in the single-family neighborhood to the east of the Project site in the City of Torrance. Numerous comments received on the Draft Environmental Impact Report (EIR) – particularly those received from adjacent property owners within the single-family residential neighborhood to the east – involve or are related to the duration of construction-related emissions and potential impacts on sensitive receptors. Some of the commenters assert that the EIR understates and minimizes the long-term effects of air pollutant emissions (e.g., the potential for suspended particulate matter [PM₁₀] to exacerbate asthma) and does not thoroughly address cumulative long-term health impacts. Some comments concern the enforceability of mitigation measures that have been required to reduce impacts to less than significant levels.

The EIR assesses the impacts associated with air pollutant emissions from construction and operation of the proposed Project in Section 3.2, *Air Quality*. As described in Section 3.2, *Air Quality* Redondo Beach and Torrance – including the Project site – are located within Source Receptor Area (SRA) 3, which covers southwestern coastal Los Angeles County. Ambient air pollutant concentrations within SRA 3 are monitored at the 7201 West Westchester Parkway Monitoring Station, which is located approximately 7.57 miles north of the Project site. Of the six criteria air pollutants, ambient concentrations of carbon monoxide (CO), ozone (O₃), nitrogen

dioxide (NO₂), sulfur dioxide (SO₂), and PM₁₀ are monitored in SRA 3. Measurements of fine particulate matter (PM_{2.5}) are taken in SRA 4 at the South Long Beach 1305 East Pacific Coast Highway Monitoring Station. As shown in Table 3.2-3, the Federal and State ambient air quality standards for CO, O₃, NO₂, SO₂, and PM₁₀ were not exceeded in SRA 3 in 2019 (the most recent year data is available), with the exception of 2 days out of the year in 2019 for PM₁₀. The ambient concentration of PM_{2.5} in SRA 4 (the nearest SRA in which PM_{2.5} is measured) did not exceed Federal standard in 2019. Therefore, overall existing air quality in the vicinity of Project site is well within the Federal and State ambient air quality standards for criteria air pollutants, which were established to protect the public health and welfare.

As described in Section 3.2.1.5, *Sensitive Receptors*, the majority of development within Redondo Beach and Torrance consists of residential uses, including large single-family residences and multi-family apartments and condominiums, all of which are considered sensitive land uses with regard to air quality. Residential uses are located to the north, south, east, and west of the Project site as close as 80 feet to the Project site. The following 11 schools within 0.5 miles (approximately 2,640 feet) of the Project site: Beach Cities Child Development Center (preschool), Towers Elementary School, Beryl Heights Elementary School, Redondo Shores High School, Redondo Beach Learning Academy, Redondo Union High School, Jefferson Elementary School, Parras Middle School, Our Lady of Guadalupe School, Valor Christian Academy, and West High School. There are also many public parks in the vicinity, including Dominguez Park, Sunnyglan Park, Entradero Park. The existing 60 Memory Care units associated with the Silverado Beach Cities Memory Care Community on the Project site would also be sensitive to construction emissions during construction activities associated with the Phase 1 preliminary site development plan. The nearest sensitive receptors to the Project site are the Silverado Beach Cities Memory Care Community and outpatient medical offices located on the Beach Cities Health District (BCHD) campus as well as the single-family residences located as close as 80 feet to the Project site.

The analysis of construction and operational emissions resulting from Phase 1 and Phase 2 of the proposed Project considers the impacts of air pollutant emissions affecting these sensitive receptors in the vicinity of the Project site. For example, the analysis of localized construction emissions under Impact AQ-2 describes that nearby residents as well as people using the recreational facilities located near the Project site, particularly the elderly and children, could experience adverse health effects from CO, NO_x, PM₁₀, or PM_{2.5}, if concentrations of these criteria pollutants exceed the applicable localized significance thresholds (LSTs), which account for potential human health effects from criteria air pollutants. LSTs for receptors located within 25 meters (i.e., approximately 82 feet) from the Project site in SRA 3 were used to determine if the construction emissions associated with Phase 1 and Phase 2 of the proposed Project would result

in exceedance of the LSTs (refer to Table 3.2-6 in Section 3.2, *Air Quality*). The construction emissions associated with Phase 1 and Phase 2 of the proposed Project were estimated using the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod), as prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. As shown in Table 3.2-6, the Phase 1 construction emissions would exceed LSTs for PM₁₀ and PM_{2.5}; therefore, air quality impacts to sensitive receptors related to localized temporary construction-related emissions would be potentially significant for the Phase 1 preliminary site development plan and less than significant for the Phase 2 development program.

Implementation of Mitigation Measure (MM) AQ-1 would require that Beach Cities Health District (BCHD) prepare and implement an Air Quality Management Plan during all construction-related activities, which shall be approved by the City of Redondo Beach and the City of Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. As required by MM AQ-1, the plan would, at a minimum, include the following conditions for construction:

- Construction equipment engines shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.
- All construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction to reduce the amount of particulate matter entrained in the ambient air. These measures include the following:
 - Quick replacement of ground cover in disturbed areas.
 - Watering of exposed surfaces three times daily.
 - Watering of all unpaved haul roads three times daily.
 - Covering all stock piles with tarp.
 - Post signs on-site limiting traffic to 15 miles per hour (mph) or less on unpaved roads.
 - Prohibit demolition when wind speed is greater than 25 mph.
 - Sweep streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads.

- Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip.
- Construction activities associated with the proposed Project shall use U.S. Environmental Protection Agency (USEPA) Tier 4 engines on all construction equipment, except crushing equipment, which would reduce DPM emissions from combustion by 94 percent for Phase 1 and 79 percent for Phase 2 construction.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.

MM AQ-1 was revised in the Final EIR to describe the methods of mitigation enforcement that shall apply to the proposed Project during construction. Specifically, MM AQ-1 was revised to describe that “[c]onstruction contractors shall ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD shall demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction.”

As shown in Table 3.2-7 in Section 3.2, *Air Quality*, implementation of MM AQ-1 would reduce on-site construction emissions for PM₁₀ and PM_{2.5} below the SCAQMD LSTs, with associated avoidance of potential impacts to human health. Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions and potential effects on human health would be less than *significant with mitigation*.

Localized operational emissions were also modeled to assess the operational air quality impacts to sensitive receptors in the vicinity of the Project site. As described under Impact AQ-3, the operational emissions associated with the proposed Project would not exceed LSTs for CO, NO_x, PM₁₀ and PM_{2.5}. These results indicate that the proposed Project would not generate levels of operational emissions that would adversely affect local air quality and public health, including residents of nearby neighborhoods, local parks and schools and onsite residents of 60 Memory Care units associated with the Silverado Beach Cities Memory Care Community. Therefore, this impact would be less than significant for both Phase 1 preliminary site development plan and the Phase 2 development program.

In addition to the analysis of localized construction and operational emissions, Section 3.2, *Air Quality* includes an analysis of toxic air contaminants (TACs), as assessed in the construction Health Risk Assessment (HRA) prepared by iLanco for the proposed Project (refer to Appendix B). As described in Section 3.2.3.2, *Methodology*, the construction HRA quantifies the potential cancer risks and non-cancer chronic health impacts (e.g., asthma and other respiratory diseases) that could affect sensitive receptors exposed to TACs from the proposed construction activities associated with Phase 1 and Phase 2 of the proposed Project. The primary TAC that contributes to health risks is diesel particulate matter (DPM or fugitive dust). The preparation of the construction HRA was conducted by: 1) calculating TAC emissions; 2) determining maximum TAC concentrations at sensitive receptors via air dispersion modeling; 3) quantifying health risks associated with those maximum concentrations; and 4) comparing those health risks to SCAQMD's thresholds of significance. CalEEMod, the standard SCAQMD-accepted model, was used to quantify emissions from anticipated construction activities. The USEPA's AERMOD dispersion model, the accepted model used by Federal, State, and local regulatory agencies, was used to model the movement of air pollutants. This analysis considered various parameters, including configuration of the construction equipment, terrain elevation, meteorological conditions (i.e., localized wind patterns), and the location of sensitive receptors in relation to the site. The California Air Resources Board's (CARB's) Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool was used to calculate cancer risk and non-cancer health impacts. HARP is the accepted model used to calculate cancer risk and non-cancerous chronic health impacts. HARP's Risk Assessment Standalone Tool module was used in this analysis to evaluate cancer risk and non-cancer chronic effects associated with the receptors noted above. Given that the proposed Project is estimated to be constructed over a period of 6 calendar years (i.e., 2022, 2023, 2024, 2029, 2030, and 2031), the exposure duration for this assessment was 6 years (i.e., 3 years for Phase 1 and 3 years for Phase 2). Therefore, the construction HRA assesses the long-term construction effects on sensitive receptors.

As previously described, the air quality analysis presented in Section 3.2, *Air Quality* presents the results of the CalEEMod and construction HRA prepared for the proposed Project by the air quality experts at iLanco. The CalEEMod results and the conclusion of the construction HRA are the results of carefully made assumptions reading schedule, duration, construction equipment, and application of air emissions control measures as well as robust air quality modeling. The air quality analysis compares the results of these studies to the quantitative significance thresholds established by the SCAQMD and meets all of the requirements in the CEQA Guidelines. Beyond simple assertions that construction activities would result in health impacts related to air quality, the

comments provided on this issue do not challenge the methodology, assumptions, or quantitative results of this extensive quantitative modeling effort.

With regard to the mitigation measures identified to reduce air quality impacts to less than significant, pursuant to CEQA Guidelines Section 15126.4, “...where potentially significant adverse environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts must also be identified and implemented.” CEQA also requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

8.2.11 Master Response 11 – Hazards and Hazardous Materials Analysis

Numerous comments on the Draft Environmental Impact Report (EIR) raised issues related to the Phase I and Phase II Environmental Site Assessments (ESAs), potential hazardous building materials, existing soil contaminants within the Beach Cities Health District (BCHD) campus as well as the potential sources off-site source of contaminants within the surrounding vicinity of the campus. Many of these comments address the potential for disturbance and dispersion of hazardous building materials during demolition of the existing buildings on the campus as well as the adequacy and interpretation of the soil boring samples. Several comments assert that tetrachloroethylene (PCE) from a former dry cleaner located within the Redondo Village Shopping Center as well as purported contamination associated with the previously abandoned and plugged oil well on the vacant Flagler Lot could result in effects on adjacent residents and school children.

However, Federal and state standards for containment and management of hazardous materials during demolition of older buildings and excavation of potentially contaminated soils are clear and rigorous. Many or most urban infill redevelopment projects encounter similar issues when older structures are demolished or subsurface soil or groundwater contamination are encountered and hundreds of projects in the Los Angeles Basin have successfully addressed similar issue while avoiding hard to the health and welfare of surrounding neighborhoods. Standards for containment, removal, remediation and transport of potentially hazardous materials such as asbestos and PCEs are clearly set forth in both state and federal regulations and the proposed Project would be required to adhere to all applicable Federal, State, and local regulations.

The EIR provides an exhaustive analysis of the environmental impacts associated with hazards and hazardous materials that could result from construction and operation of the proposed Project in Section 3.8, *Hazards and Hazardous Materials*. The term hazardous materials is used in this section to refer to chemicals such as petroleum products, solvents, agricultural pesticides, herbicides, paints, metals, asbestos-containing material (ACM), lead-based paint (LBP), and other regulated materials (e.g., polychlorinated biphenyls [PCBs]). A range of other types of hazards are addressed in other sections of this EIR, including: hazardous air pollutants (e.g., toxic air contaminants [TACs] and diesel particulate matter [DPM]) addressed in Section 3.2, *Air Quality*; geologic hazards (e.g., earthquakes, soil stability, etc.) addressed in Section 3.6, *Geology and Soils*; polluted stormwater runoff is discussed in Section 3.9, *Hydrology and Water Quality*; urban fire protection services and response/suppression systems discussed in Section 3.13, *Public Services*; and transportation-related hazards (e.g., pedestrian and bicycle safety) discussed in Section 3.14, *Transportation*.

The hazards and hazardous materials analysis is based on the Phase I and Phase II ESAs prepared by Converse Consultants, a firm with decades of experience preparing environmental due diligence studies for development projects across California. The analysis also considers the compliance with all applicable Federal and State regulations, including requirements for containment to protect adjacent land uses.

Phase I ESAs consist of a site inspection, interviews, and database searches to identify the potential for Recognized Environmental Conditions (RECs) (i.e., potential sources of environmental contamination) associated with the underlying land as well as the physical improvements to the property. If the Phase I ESA determines that there are RECs, then a Phase II ESA may be conducted. Phase II ESAs include targeted sampling, investigation, and analysis of the potential soil and/or groundwater contamination identified in the Phase I ESA. Based on the findings of the Phase I ESA for the Project site, which identified potential sources of contamination, including a

previously abandoned and plugged oil and gas well located on the Flagler Lot as well as a former dry cleaner located within the Redondo Village Shopping Center, Wood Environment & Infrastructure Solutions, Inc. (Wood) recommended that Converse Consultants prepare a Phase II ESA.

The Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants, consistent with industry standards as well as all applicable Federal and state regulations. Soil samples were analyzed for volatile organic compounds (VOCs), Total Petroleum Hydrocarbons (TPH), Title 22 metals, organochlorine pesticides (OPPs), and semi-volatile organic compounds (SVOCs) in accordance with methods described by the U.S. Environmental Protection Agency (USEPA). Soil vapor probes were screened from methane, static pressure, and concentrations of oxygen and carbon dioxide. The purpose of completing soil borings was to identify the absence or presence of contaminated soil and/or soil vapor on the Project site. Three of the screened contaminants were detected in excess of their residential screening levels: PCE, benzene, and chloroform, all of which are classed as VOCs. This identification of contaminants was then used to inform precautionary or remedial activities necessary during construction. No further soil boring sampling, which was requested by some commenters, is necessary because the presence of contaminants has already been identified. (In such a case, standard regulatory actions including containment and protection of adjacent uses will be required as a matter of law.) CEQA Guidelines Section 15204 clearly states: “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.*”

Ground disturbing activities (e.g., excavation, trenching, and grading) during Phase 1 and Phase 2 would disturb PCE-contaminated soils, beginning with the excavation for the subterranean levels of the Residential Care for the Elderly (RCFE) Building to a depth of 26 feet during Phase 1. Similarly, grading within the vacant Flagler Lot would also affect PCE-contaminated soils. During Phase 2 excavation for the subterranean levels of the proposed parking structure, service areas, and other trenching and grading activities during Phase 2 would encounter PCE-contaminated soils. Disturbance of benzene-contaminated soil could occur during Phase 1 with the removal of the existing northern surface parking lot and subsequent excavation and construction activities associated with the proposed RCFE Building. Disturbance of chloroform concentrations could occur during Phase 2 as a result of demolition of the existing parking structure and potentially the Beach Cities Advanced Imaging Building as well as subsequent excavations, grading, and construction activities. Implementation of mitigation measures Mitigation Measure (MM) HAZ-2a through HAZ-2d would ensure VOC compounds and contaminated soils are detected and

properly managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies.

As described in Section 3.8.1, *Environmental Setting*, the Beach Cities Health District (BCHD) has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the Certified Unified Program Agency (CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup. Although previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the BCHD campus have not experienced vapor intrusion from subsurface contamination, development would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatized PCE through carbon filters before outgassing the vapor at a controlled rate. Because PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

Construction activities during each phase of development would require transportation, use, storage, and disposal of small quantities of commercially available hazardous materials, including vehicle fuels, oils, transmission fluids, and hydraulic fuels. However, the use of such materials would be in limited quantities (i.e., not commercially reportable) and would be handled in compliance with Federal, State, and local regulations pertaining to their transport, use, or disposal

(e.g., Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan as well as the applicable hazardous materials programs administered by LACoFD described in Section 3.8.2, *Regulatory Setting*. As such, the potential for hazardous materials release associated with the transport, use, or disposal would be limited to the accidental spill of chemicals, petroleum, oils, and lubricants within the on-site construction staging areas or along the proposed haul routes. As described in Section 2.5.1.6, *Construction Activities*, the development application(s) for the proposed Project would include a comprehensive Construction Management Plan, to be submitted for review and approval by the Redondo Beach and Torrance Building & Safety Divisions prior to the issuance of demolition, grading, or building permits. In addition to further defining the construction staging locations within the Construction Management Plan would also provide a detailed description of requirements for storage of hazardous materials, construction fueling areas, and spill kits and secondary containment consistent with all applicable Federal, State, and local regulations. The transport of large quantities of hazardous materials to the Project site, if any, would be subject to applicable Federal, State, and local regulations intended to reduce the risk of accidental spills, leaks, fire, or other hazardous conditions. The U.S. Department of Transportation (DOT), Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as enforced by the California Highway Patrol (CHP) and California Department of Transportation (Caltrans) described in Section 3.8.2, *Regulatory Setting*. Compliance with applicable regulations as well as oversight by the appropriate Federal, State, and local agencies would minimize the risk of hazardous materials exposure during transport. Therefore, the proposed Project would result in a less than significant impact regarding the transport of hazardous materials. All hazardous materials used operationally on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. The proposed Project would be subject to all of the requirements set forth in Chapter 4 (Small Quantity Generator Requirements) of the Health and Safety Code Medical Waste Management Act. Adherence to medical waste regulations for small quantity generators would ensure that impacts related to the storage, transport, and disposal of medical waste would be less than significant.

As described in Section 3.8.1, *Environmental Setting*, based on the age of existing structures, building materials may contain ACM, LBP, PCBs. Improper attempts to remove ACM can release asbestos fibers into the air. However, as required by MM HAZ-1, surveys for ACM, LBP, and PCBs would be conducted by a licensed contractor(s) prior to and during the demolition activities. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs),

related to the treatment, handling, and disposal of ACM, LBP, PCBs, and mold to ensure public safety, such as sealing off an area with plastic and filtering the affected air to ensure that no asbestos fibers are let out into the surrounding environment. Therefore, implementation of mitigation measure MM HAZ-1 and compliance with existing mandatory regulations and abatement procedures for the treatment, handling, and disposal of ACM, LBP, PCBs and mold, would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools.

The Phase I ESA identified several potential environmental conditions adjacent to the Project site including the former landfill at 200 Flagler Lane as a potential source of contamination. However, as described in Section 3.8, *Hazards and Hazardous Materials* the former landfill at 200 Flagler Lane underwent cleanup after its closure and a completed-case closed designation was issued by the Los Angeles RWQCB. The Phase 1 ESA did not identify the former landfill as a potential REC; therefore, the landfill requires no further analysis.

The Phase I ESA identified several potential environmental conditions at the Project site including a previously plugged and abandoned oil and gas well on the vacant Flagler Lot. As described in Section 3.8.1, *Existing Environmental Setting*, Converse Consultants was unable to confirm the precise location of the well. In September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM's Well Review Program and compliance with CalGEM's advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

The Phase I ESA also identified the historic use of a small pond for agriculture purposes and historical use of a second pond on the vacant Flagler Lot. Despite review of available historical

records, the purpose and use of the second pond is unknown. However, the Phase I ESA did not identify these historic ponds as a REC. Further, as described above, soil borings were completed to identify the presence of potential hazardous contaminants across the Project site. No contaminants aside from the three VOCs described above were found. Therefore, the historic pond does not require further analysis. Issues related to geologic stability are discussed in Section 3.6, *Geology and Soils*.

8.2.12 Master Response 12 – Noise Analysis

Numerous comments on the Draft Environmental Impact Report (EIR) raised issues related to the temporary, but prolonged construction-related noise as well as operational noise. Many of the comments simply stated the commenter’s opinion that the EIR understates the noise impacts to the surrounding sensitive receptors. Many also asserted, without substantiating evidence or expert opinion, that the proposed Project would result in impacts to school children at Towers Elementary School. Finally, other comments challenged the use of the Federal Transit Authority (FTA) thresholds in the EIR, instead asserting that metrics such as L_{max} should have been considered.

The EIR includes an extensive assessment of construction-related noise impacts and operational noise impacts associated with the construction and operation of the Phase 1 site development plan and Phase 2 development program. As discussed therein, information for the section was developed based on review of current noise and vibration standards and assessment methodologies, which include use of the Federal Highway Administration (FHWA) Traffic Noise Model, FHWA Roadway Construction Model, and the Federal Transit Administration’s (FTA’s) *Transit Noise and Impact Assessment Manual* (FTA 2018). Included in the analysis of noise impacts is a detailed assessment of construction-related noise and vibration from heavy construction equipment and construction vehicle; operational noise resulting from occupancy of the proposed facilities, including noise generated from outdoor function areas and outdoor events; and traffic and roadway noise and vibration. Where potentially significant impacts have been identified (i.e., construction-related noise) detailed mitigation measures have been development to reduce noise levels to the maximum extent feasible.

Occupational exposure to noise is controlled at the Federal level by Occupational Safety and Health Administration (OSHA) and at the State level by the California Division of Safety and Health. Pursuant to Federal and State regulations, the maximum allowable noise exposure over an eight-hour period is a level of 90 dBA. For each halving of the exposure time, the maximum noise level is allowed to increase 5 dBA. Therefore, the maximum allowable noise exposure (100 percent) is 90 dBA for 8 hours, 95 dBA for 4 hours, 100 dBA for 2 hours, 105 dBA for 1 hour, 110 dBA for 30 minutes, and 115 dBA for 15 minutes. Nevertheless, for the purposes of this EIR,

construction noise impacts would occur if expected noise levels exceed the FTA's residential criteria (8-hour L_{eq} of 80 dBA and 30-day average L_{dn} of 75 dBA) and operational noise impacts would occur if expected noise levels allowable noise standards of the Redondo Beach Municipal Code (RBMC) (nighttime interior noise limit of 40 dBA and daytime interior noise limit of 45 dBA) and the Torrance Municipal Code (TMC) (nighttime interior noise limit of 50 dBA and daytime interior noise limit of 55 dBA). The criteria and standards of the FTA, RBMC, and TMC are established to limit or prevent adverse noise impacts on human health and are set at limits below those established by OSHA and the California Division of Safety and Health.

The EIR includes adequate discussion of the potential impacts and mitigation of construction-related noise and vibration both on- and off-site under Impact NOI-1 and Impact NOI-2 in Section 3.11.5, *Project Impacts and Mitigation Measures*. This analysis includes detailed estimates of Project construction noise levels and their impact on various sensitive receptors. The full list of noise-sensitive land uses considered in the analysis of noise impacts is presented in Table 3.11-16 and includes residences near the Project site, Towers Elementary School, and on-site facilities. As presented therein, the proposed construction activities during both Phase 1 and Phase 2 would have significant impacts to noise-sensitive receptors for the duration of the construction phases, because the projected L_{eq} would exceed the FTA's residential criteria. To reduce the impacts of excessive construction noise on surrounding land uses, Mitigation Measure (MM) NOI-1 is identified. This measure would require the implementation of a Construction Noise Management Plan that requires:

- Limitations on the hours of construction activities;
- Installation of noise barriers;
- Implementation of noise best management practices and active noise suppression features, such as muffling of equipment, use of electric power tools, and staging of equipment away from on-site and off-site sensitive uses;
- Use of designated haul routes;
- Distribution of notices prior to initiation of construction activities; and
- Frequent monitoring of noise and vibration resulting from construction to ensure implementation of all noise attenuation measures.

As discussed under Impact NOI-1 implementation of this mitigation measures, as well as required compliance with the Redondo Beach and Torrance Noise Regulations (RBMC Sections 4-24.5-3 and 9-1.12 and TMC Section 6-46.31) would reduce construction noise impacts; however, feasible

noise barrier heights and locations would not reduce noise levels below the FTA's residential criterion and impacts are considered significant and unavoidable. Nevertheless, expected noise levels would not exceed the 8-hour 90-dBA limit identified by OSHA and the California Division of Safety and Health for defining when impacts on human health would occur. Impacts from generation of ground-borne vibration on noise-sensitive receptors located along Beryl Street, Del Amo Boulevard, North Prospect Avenue, and 190th Street would be less than significant according to FTA and based on approved methodologies for analysis of noise vibration and ground-borne vibration. Nevertheless, MM NOI-2 is proposed to further reduce less than significant impacts from haul trucks during construction.

The noise analysis presented in the EIR also includes detailed discussion and analysis of impacts associated with operation of the proposed Project. Despite commenters assertions, this analysis does in fact include consideration of noise generated at the Project site (e.g., heating, ventilation, and air conditioning [HVAC] equipment, delivery and service trucks, parking operations, outdoor functions), increases in roadway noise as a result of increased traffic, and emergency vehicle noises which would be perceived by nearby noise-sensitive land uses. For instance, the analysis considers the potential increase in total number of individuals requiring ambulance services and the associated number of ambulance calls associated with this number based on average annual calls per bed space per year. While it is noted that these responses would be sporadic and not always require the use of sirens, the analysis includes discussion of the typical noise impacts that increased medical response would generate when sirens are utilized (approximately 100 dBA at 100 feet, and between 91 and 100 dBA at receptors along North Prospect Avenue and Beryl Street). In such a case, associated noise impacts are not considered significant given the infrequent and short duration of siren utilization (duration of exposure to peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic).

While the analysis does not explicitly identify noise impacts from the proposed Southern California Edison (SCE) Substation Yard, medium voltage distribution system, and generator yard, noise impacts of these improvements are considered to be negligible. According to the National Electrical Manufacturers Association (2014) and Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50 feet, which is well below the ambient L_{dn} noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed electrical yard would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment. Nevertheless, additional discussion regarding operational noise impacts of the proposed electrical yard has been included in discussion of in Section 3.11, Noise under Impact NOI-3.

With regard to analysis of impacts based on L_{eq} versus L_{max} metrics, the threshold for identifying significance of noise impacts based on Appendix G of the CEQA Guidelines state that a significant impact may occur “if the project would result in: (a) generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies...” Within the City of Redondo Beach and the City of Torrance, the local general plan and noise ordinance do not establish quantitative noise limits or other standards for construction, nor do they establish standards or thresholds for evaluating the environmental impacts of construction noise. Recent EIRs prepared by the City of Redondo Beach have relied on the *City of Los Angeles CEQA Guidelines (2006)* significance threshold for construction noise, while recent EIRs prepared by the City of Torrance have applied thresholds based in part upon Table N-2 of the General Plan Noise Element. However, these thresholds differ and, given the location of the Project site within Redondo Beach and partially within City of Torrance right-of-way, BCHD has elected to identify a standardized threshold that is applicable across all local jurisdictions. In the absence of local standards established in a general plan or noise ordinance, the analysis of Project noise impacts in this EIR is instead based upon the Detailed Analysis Noise Criteria presented in the FTA’s *Transit Noise and Vibration Impact Assessment Manual*. Within these guidelines, the FTA states that an 8-hour L_{eq} of 80 dBA and a 30-day average of 75 L_{dn} is a reasonable criterion for assessment of construction activities on residential land use. For these reasons, the analysis of noise impacts from construction is based upon the L_{eq} metric and not the L_{max} metric. The L_{eq} unit of measurement is appropriate because L_{eq} can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,
- Average noise over all phases of the construction.

While the analysis of noise impacts based upon the L_{max} unit of measurement may be applicable to some jurisdictions based upon their adopted general plan or noise ordinance standards and thresholds, such thresholds and standards have not been adopted or implemented by the City of Redondo Beach and the City of Torrance in their analysis of construction-related noise impacts. Further, the direct use of the L_{max} unit of measurement is not supported by the FHWA’s Roadway Construction Noise Model or FTA’s *Noise and Vibration Impact Assessment Manual*. Specifically, the FTA’s Noise and Vibration Impact Assessment Manual (2018) states that:

“[a]lthough L_{max} is commonly used in vehicle-noise specifications, it is not used for transit environmental noise impact assessment. L_{max} does not include the number and duration of transit events, which are important for assessing people's reactions to noise. It also cannot be normalized to a one-hour or 24-hour cumulative measure of impact, and therefore, is not conducive to comparison among different transportation modes.”

8.2.13 Master Response 13 – Transportation Analysis

Several comments have asserted that the impacts to transportation are downplayed in the Environmental Impact Report (EIR). Comments regarding construction-related traffic have asserted that construction activities would result in significant impacts related to pedestrian safety and could affect adjacent single-family residential neighborhoods through off-street construction parking. With regard to operational traffic, numerous comments asserted that trips generated by employees, residents, and family of the proposed Assisted Living units and Memory Care units would contribute to existing congestion and that cut-through traffic would be likely to exacerbate impacts to residential streets. However, the EIR thoroughly assesses the impacts associated with vehicle trips, mobility, and transportation safety from construction and operation of the proposed Project in Section 3.14, *Transportation*.

Duration and Timing of Construction-Related Traffic

As described in Section 3.14, *Transportation* the majority of construction-related truck trips would occur during excavation and soil export activities for Phase 1 of the proposed Project. Construction-related traffic would be temporary in nature. Further, implementation of Mitigation Measure (MM) T-2 would reduce this impact by requiring the preparation of a Construction Traffic and Access Management Plan, which would include measures to reduce construction traffic and maintain public safety. For example, MM T-2 would require work within the public right-of-way, including soil and demolition material hauling and construction material delivery, to occur between 9:00 a.m. and 4:00 p.m. to avoid conflicts with morning (AM) and evening (PM) peak hour traffic periods. As described in MM T-2, work within the public right-of-way outside of these hours shall only be allowed contingent upon the issuance of an after-hours construction permit from the Redondo Beach and/or the Torrance Community Development Departments, depending on where such work occurs.

Impacts to Vehicle, Bicycle, and Pedestrian Mobility and Safety

The EIR analyzes in detail potential impacts to vehicle and pedestrian mobility and safety during construction activities associated with the proposed Project are discussed in Section 3.14.4, *Project Impacts and Mitigation Measures* under Impact T-3. As discussed therein, increased construction

traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and potentially slow traffic movement. In addition, frequent haul truck traffic entering and exiting the driveways along North Prospect Avenue and Beryl Street could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, through temporary closure of bicycle lanes or sidewalks. Other potential construction-related impacts include idling, parked, or queued haul trucks that could potentially obstruct visibility. As a result, construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity are identified in this EIR as potentially significant impacts. To avoid construction-related safety hazards, the preparation and implementation of a Construction Traffic and Access Management Plan required under MM T-2 would address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible.

Revised Construction Haul Routes

Implementation of MM T-2 also requires that the Beach Cities Health District (BCHD) obtain approval from the City of Redondo Beach and the City of Torrance of any haul routes for earth, concrete, or construction materials and equipment hauling where such route cross the jurisdictional boundaries. Due to requests from the City of Torrance and the Torrance Unified School District (TUSD) in their public comments for revisions to the construction haul routes proposed in the Draft EIR, the following construction haul routes have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to schools:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from the vacant Flagler

Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards Interstate (I-) 405.

- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesia Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.
- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

These proposed inbound and outbound construction haul routes for the proposed Project have been revised in the Final EIR in response to these requests from the City of Torrance and TUSD.

TUSD also requested during the public comment period MM NOI-1 (Construction Noise Management Plan) to be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School, in order to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts. This request will require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1st grade and 5th grade), and are not the same at the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

Operational Cut-Through Traffic

The EIR and supporting Vehicle Miles Traveled Study (see Appendix M) provide a detailed assessment of potential changes in cut-through traffic. Existing cut-through traffic between Beryl Street and Del Amo Boulevard in the City of Torrance is discussed in Section 3.14.1, *Environmental Setting*. As shown in Table 3.14-3, cut-through traffic is more frequent during the AM peak period, with up to 47 percent of the vehicle traveling between Beryl Street and Del Amo Boulevard contributing to cut-through traffic. As described under Impact T-3, cut-through traffic could present a safety hazard associated with speeding through residential neighborhoods and the increased risk of collisions. Cut-through traffic is a major concern for the residents and was identified as an area of public concern within the agency and public comment letters received on

the Notice of Preparation (NOP) for this EIR (refer to Section 1.8, *Areas of Known Public Controversy*).

Based on the detailed analysis of existing conditions – including various traffic counts along roadway segments in the neighborhood – the EIR the performed an analysis on how the proposed Project could affect cut-through traffic. As previously described, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by turning right off of Flagler Lane and exit turning left turn onto northbound Flagler Lane. Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to parking on the BCHD campus and as such, would not be a primary entrance. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood.

Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing trip generation at the BCHD campus. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the BCHD campus (when most cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods, with no measurable increase in cut-through traffic forecasted by the study. Therefore, the proposed Project would not contribute to operational safety hazards related to peak period cut-through traffic, and impacts would be less than significant.

Operational Vehicle Trips

As described in Section 3.14, *Transportation*, the Vehicle Miles Traveled Study (see Appendix K) prepared for the proposed Project by Fehr & Peers determined that 3,284 of the total existing daily vehicle trips are generated from land uses within the Beach Cities Health Center. Phase 1 of the proposed Project would demolish the Beach Cities Health Center and subsequently remove these 3,284 daily vehicle trips from the roadway network. (The remaining 3,429 existing daily trips are generated by the medical office uses at 510 North Prospect Avenue and 520 North Prospect Avenue, which would remain in operation under Phase 1 of the proposed Project.)

During operation of the Phase 1 preliminary site development plan, the proposed uses within the Residential Care for the Elderly (RCFE) Building that would replace the Beach Cities Health Center are expected to generate 1,365 daily vehicle trips, including 73 AM peak period trips and 64 PM peak period trips (refer to Table 3.14-6). The net trip generation, which is calculated by subtracting the existing trips generated by the Beach Cities Health Center from the estimated trips that would be generated by the proposed RCFE Building, is expected to be negative. This means that more vehicle trips would be removed from the roadway network than the number of trips that would be added to the roadway network from operation of the proposed RCFE Building. Implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). This is in part because Phase 1 of the proposed Project would replace high trip generating land uses (e.g., medical office) with lower trip generating land uses (e.g., Assisted Living units). This reduction in daily vehicle trips as a result of Phase 1 is also attributed to the demolition of most of the existing uses within the Beach Cities Health Center and the construction of only a small portion of the proposed Healthy Living Campus Master Plan.

After completion of Phase 2, however, the proposed Project is expected to generate a total of 3,360 daily vehicle trips, including 271 AM peak period trips and 195 PM peak period trips (refer to Table 3.14-7). After accounting for existing trips being removed from the roadway network, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate a net increase of 376 new daily trips as compared with existing conditions.

As described under Impact T-2, implementation of MM T-1 would require BCHD to prepare and implement a comprehensive Transportation Demand Management (TDM) plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors. The TDM plan would be developed prior to the issuance of a Conditional Use Permit (CUP) for Phase 1 of the proposed Project and would be continuously maintained and adjusted, as needed. Implementation of the TDM Plan would require annual surveys to capture trip origin data, travel mode, rideshare (e.g., number of people in the party), and other key data and indicators for TDM program performance related to vehicle miles traveled (VMT) (e.g., employee incentives for bicycling to work). Annual monitoring reports would include trip length surveys for BCHD employees and tenants of the BCHD campus. Survey results would be used to determine the appropriate TDM measures to employ in the coming year to maximize reductions in VMT per capita, promote transit and alternative mode transportation to the BCHD employees, develop appropriate incentives to increase the BCHD's transit mode share incrementally over time, and develop effective marketing tools to advertise transit and non-vehicular travel mode availability

and incentives. A range of TDM measures would be considered to reduce employee and visitor VMT per capita, such as providing employee incentives to participate in a vanpool program and regularly advertise the opportunities to vanpool through a variety of employee communication formats, a transportation information center and wayfinding signage for nearby Beach Cities Transit Line 102 bus stops, and on-site bicycle amenities for employees and visitors. Therefore, implementation of MM T-1 would reduce operational vehicle trips associated with the proposed Project.

8.2.14 Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard

Placement of Substation

Under the proposed Project, the existing Maintenance Building and connected substation would be demolished and redeveloped with open space and pedestrian walkways. A new electric service would be developed in conjunction with Southern California Edison (SCE) – including the development of a new on-site distribution system. The proposed design for the electrical distribution system includes a SCE Substation Yard, medium voltage distribution system, and generator yard, which would be located along the southern end of the Project site.

Potential locations for the new substation and electrical yard are limited to areas where: the substation could be installed early in the project timeline (i.e., outside of active construction zones); the substation would be readily accessible by truck for SCE service and maintenance activities during all phases of project construction and operation; and existing utility connections are present. As such, location of the new substation yard, generator yard, and gas valve enclosure is limited to the southeastern hillside of the Project site. The substation would be constructed at the toe of the slope adjacent to Flagler Alley, surrounded by a perimeter wall, and screened by proposed landscaping.

Electricity and Health

Electricity powerlines, substations, transformers and other electrical sources such as common electrical appliances and wiring, all emit extremely low frequency (ELF) electric and magnetic fields (EMF). For substations and transformers, the magnetic fields at distances of 5 to 10 meters (approximately 16 to 33 feet) away are generally indistinguishable from typical background levels in the home. As we are surrounded by electrical sources in our daily lives we are all exposed to some level of ELF EMF constantly. Since the late 1970s, questions have been raised whether exposure to these ELF EMF produces adverse health consequences. Most of the research indicates

that ELF EMF exposure normally encountered in the environment, including in the vicinity of powerlines, does not pose a risk to human health.

Based largely on this limited evidence the International Agency for Research on Cancer has classified ELF magnetic fields as possibly carcinogenic to humans. However, there is no established evidence that the exposure to magnetic fields from powerlines, substations, transformers or other electrical sources, regardless of the proximity, causes any health effects. In October 2005, the World Health Organization (WHO) convened a Task Group of scientific experts to assess any risks to health that might exist from exposure to ELF electric and magnetic fields in the frequency range >0 to 100,000 Hertz (Hz) (100 kilohertz [kHz]). Following a standard health risk assessment (HRA) process, the Task Group concluded that there are no substantive health issues related to ELF electric fields at levels generally encountered by members of the public. Much of the scientific research examining long-term risks from ELF magnetic field exposure has focused on childhood leukemia associated with average exposure to residential power-frequency magnetic field above 0.3 to 0.4 microteslas (μT). However, there is limited evidence of carcinogenicity in humans and less sufficient evidence for carcinogenicity in experimental animals. Evidence is weakened by methodological problems, such as potential selection bias. In addition, there are no accepted biophysical mechanisms that would suggest that low-level exposures are involved in cancer development. Evidence related to childhood leukemia is not strong enough to be considered causal.

A number of other adverse health effects have been studied for possible association with ELF magnetic field exposure. These include other childhood cancers, cancers in adults, depression, suicide, cardiovascular disorders, reproductive dysfunction, developmental disorders, immunological modifications, neurobehavioural effects and neurodegenerative disease. The WHO Task Group concluded that scientific evidence supporting an association between ELF magnetic field exposure and all of these health effects is much weaker than for childhood leukemia. In some instances (i.e., for cardiovascular disease or breast cancer) the evidence suggests that these fields do not cause them. In conclusion, the scientific evidence does not establish that exposure to ELF EMF found around the home, the office or near powerlines and other electrical sources is a hazard to human health.

Electricity and Electronic Medical Implants

To protect carriers of electronic medical implants, several safeguards are built into the devices to shield them from normal daily interference. Manufacturers often design medical implants to operate normally during an exposure to electromagnetic fields commonly encountered in residential, commercial or medical environments. The International Organization for

Standardization recommend pacemakers and ICDs give resistance up to 5.4 kilovolts per meter (kV/m) (for 60 Hz electric fields). Given that the proposed 4.12 kV substation would be enclosed and setback from publicly accessible areas both on and off-site, operation of the new electrical distribution system at the Project site would not interfere with electronic medical implants.

8.2.15 Master Response 15 – Purpose of Public Review

Wood Environment & Infrastructure Solutions, Inc. (Wood) has decades of experience the preparation of environmental documentation compliant with the California Environmental Quality Act (CEQA) including over 60 Environmental Impact Reports (EIR) for jurisdictions across Southern California and Central California.

As provided in Section 15200 of CEQA Guidelines, the purpose of review of EIRs include: the sharing of expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals. CEQA Guidelines Section 15204 defines the suggested focus of the review:

“In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

The EIR alone stands along as the public record for compliance with CEQA. As such, the public review period is intended to provide opportunity for interested parties to comment on the technical sufficiency of the EIR analysis, not to disparage the EIR preparers, proponent, lead agency, responsible agencies, or any of the other commentors on the EIR. For that reason, response to public comments and informational requests that are not directly related to the contents of the EIR or exceed what can be reasonably provided will not warrant further discussion in this response to comments.

8.2.16 Master Response 16 – Environmental Justice

Socioeconomic and environmental justice impacts in and of themselves are not physical environmental impacts, which are the focus of the California Environmental Quality Act (CEQA). CEQA requires an Environmental Impact Report (EIR) to “*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines 15126.2[a] and Public Resources Code Section 21000[a]). CEQA Guidelines Section 15382 defines “*significant effect on the environment*” as “*a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.*”

Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]) may have on a community in Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, 3.7 *Greenhouse Gas Emissions and Climate Change*, 3.9 *Hydrology and Water Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.10, *Land Use and Planning*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. The EIR also analyzes for effects on community services and population and housing, including Section 3.5, *Energy*; Section 3.12, *Population and Housing*, Section 3.13, *Public Services*, Section 3.15, *Utilities and Service Systems*, and Section 4.0, *Other CEQA Considerations*.

Similarly, the CEQA Guidelines do not explicitly require consideration of environmental justice, which relates to whether a project would result in disproportionate, adverse impacts on a low-income, minority, or otherwise disadvantaged populations. Nevertheless, given the claims of some commenters that the proposed Project would result in adverse impacts on Environmental Justice communities, this issue was explored in further detail.

The California Environmental Protection Agency’s (CalEPA’s) Office of Environmental Health Hazard Assessment (OEHHA) developed the California Communities Environmental Health Screening Tool (CalEnviroScreen), which provides State-wide data that can be used to identify communities disproportionately impacted by, or vulnerable to, environmental pollution and contaminants. Disadvantaged communities are defined as the top 25 percent of scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations. This ranking is based on specific categories such as pollutant exposure, environmental effects, sensitive populations, and socioeconomic factors. According to California OEHHA CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. While not

specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

8.3 INDIVIDUAL COMMENT RESPONSES

8.3.1 Public Agency Responses

Letter EG

June 10, 2021

Emily Gibson, Associate Transportation Planner / Frances Duong, Branch Chief
Caltrans District 7, Local Development – Intergovernmental Review
100 S. Main Street
Los Angeles, CA 90012

Comment EG-1

The comment expresses appreciation for the opportunity to review the proposed Project, provides a summary of the proposed Project components, and discusses the replacement of the Level of Service (LOS) metric with the Vehicle Miles Traveled (VMT) metric pursuant to Senate Bill (SB) 743. As described in Section 3.14, *Transportation*, changes in State law now require an analysis of VMT by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing LOS by measuring intersection congestion and roadway capacity. Consistent with the intent of SB 743 and the associated updates to the CEQA Guidelines, the Vehicle Miles Traveled (VMT) Study prepared by Fehr & Peers (see Appendix K) provides a discussion of VMT associated with the proposed Project.

Comment EG-2

The comment expresses support for the complete streets elements of the proposed Project (e.g., tree-lined pedestrian promenade and bicycle facilities), which the comment states would reduce VMT and greenhouse (GHG) emissions and align with the mission of the California Department of Transportation (Caltrans) to provide a safe and reliable transportation network that serves all people and respects the environment. Although these comments do not address the adequacy of the EIR, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment EG-3

The comment expresses support for the recommended Mitigation Measure (MM) T-1, which would require BCHD to prepare and implement a comprehensive Transportation Demand

Management (TDM) plan in accordance with Redondo Beach Municipal Code (RBMC) Section 10-2.2406. The comment suggests creating a specific VMT reduction goal for the plan to better evaluate its success and revise it if needed. The comment also recommends ensuring that no more parking than required by the local permitting agency is provided to further reduce VMT.

BCHD acknowledges Caltrans' recommendation for requiring aggressive VMT reduction targets. However, it should be noted that MM T-1 is recommended to assist in implementing the TDM plan required for the proposed Project by RBMC Section 10-2.2406. The alternative transportation and active transportation (e.g., walking, biking, etc.) strategies provided in MM T-1, which would further reduce Project-related VMT, would be more aggressive than those required by RBMC Section 10-2.2406. The BCHD TDM Coordinator would monitor employee, tenant, and visitor mode share with annual surveys and develop annual reports for submittal to the BCHD Board of Directors. The TDM Coordinator would evaluate the effectiveness of the TDM measures being implemented at the BCHD campus and recommend adjustments as needed to the TDM plan on an annual basis. Therefore, while further additional VMT reduction targets are not required pursuant to CEQA, BCHD is committed to aggressive implementation, monitoring, and adaptive management of the TDM plan.

With regard to parking, it should be noted that BCHD carefully determined the appropriate number of parking spaces for the development proposed in Phase 1 and Phase 2 based on a shared parking study prepared by Fehr & Peers. The shared parking study was instrumental in ensuring that there would be adequate parking supply on-site in order to avoid spill over into the surrounding residential community. However, the shared parking study, which carefully considered each of the proposed uses and the timing and frequency of trips associated with those uses, was also used to ensure that the Project site would not be overparked. As described in Section 1.5, *Required Approvals*, BCHD would pursue approval from the Redondo Beach Building & Safety Division for shared parking pursuant to RBMC Section 10-1.1706.

Comment EG-4

The comment suggests using more recent data from the 2020 Caltrans Fact Booklet. Section 3.5, *Energy* has been updated to reference the 2020 Caltrans Fact Booklet. In Section 3.14, *Transportation*, data from the year 2017 is used for consistency with the analysis of VMT in the City of Redondo Beach and the City of Torrance, for which 2017 is the most recent data available. The text has been revised to clarify that 2017 is the most recent available data for regional and local VMT, rather than for State-wide VMT.

Comment EG-5

The comment suggests replacing 2001 Caltrans data and references to the 2006 Caltrans Highway Design Manual with data from the 2020 Caltrans Highway Design Manual. Section 3.6, *Energy*, Section 3.14, *Transportation*, and Section 7.0, *References* have been updated with reference to the 2020 Caltrans Highway Design Manual.

Comment EG-6

The comment recommends ensuring that the most recent Federal and State laws applicable to hazardous waste materials are listed in the EIR by referring to the Laws, Regulations, and Guidance section of Caltrans' webpage. This webpage has been reviewed to confirm the most recent Federal and State laws applicable to hazardous waste materials are listed in Section 3.8.1, *Regulatory Setting*.

Comment EG-7

The comment requests that all references to the Caltrans 2013 Transportation and Construction Vibration Guidance Manual in Section 3.11, *Noise* be updated to the April 2020 version of the manual. Section 3.11, *Noise* and Section 7.0, *References* have been updated to reference the 2020 Transportation and Construction Vibration Guidance Manual.

Comment EG-8

The comment requests that all references to the 1998 Technical Noise Supplement, Traffic Noise Analysis Protocol be updated to either the 2013 Caltrans Technical Noise Supplemental to the Traffic Noise Analysis Protocol or the April 2020 Caltrans Traffic Noise Protocol. References to the 1998 Technical Noise Supplement, Traffic Noise Analysis Protocol in Section 3.11, *Noise* and Section 7.0, *References* have been updated to the 2013 Caltrans Technical Noise Supplemental to the Traffic Noise Analysis Protocol.

Comment EG-9

The comment recommends including signatures on the title page and responsible agencies on the cover page. A discussion of responsible agencies is provided in Section 1.3, *Purpose and Legal Authority*. Signatures have been provided, where appropriated, in the Final EIR.

Comment EG-10

The comment states that a Caltrans transportation permit is needed for any transportation of heavy construction equipment and/or materials that requires use of oversized-transport vehicles on State highways. Section 1.5, *Required Approvals* of the EIR has been revised to include requirement of a transportation permit from Caltrans for the transportation of heavy construction equipment on

State highways. The comment also recommends limiting large size truck trips to off-peak commute periods and submitting the Construction Traffic and Access Management Plan for Caltrans review if construction traffic is expected to cause issues on State Route (SR-) 1 or Interstate (I-) 405. As described under Impact T-2, construction activities associated with the proposed Project would result in additional construction-related traffic on the SR-1 and I-405 freeways. Such traffic would include heavy haul trucks, cement trucks, and equipment delivery trucks. MM T-2 would require work within the public right-of-way, including soil and demolition material hauling and construction material delivery, to occur between 9:00 a.m. and 4:00 p.m., thereby reducing impacts on the surrounding transportation network during the AM and PM peak hours. BCHD would obtain any Caltrans permits required, including permits required for the use of oversized-transport vehicles on state highways. MM T-2 has been revised to ensure that the Construction Traffic and Access Management Plan is submitted for Caltrans review prior to implementation.

Letter KB

April 29, 2021
Keith Butler
Chief Business Officer
Torrance Unified School District

Comment KB-1

The comment re-states the role of Torrance Unified School District (TUSD) as a reviewing agency under the California Environmental Quality Act (CEQA). Specifically, TUSD operates public K-12 schools within the City of Torrance and is responsible for the safety and well-being of students and employees on school grounds. The comment also briefly summarizes the proposed redevelopment of the existing Beach Cities Health District (BCHD) campus. As the lead agency, BCHD recognizes this TUSD's role and ongoing participation in the CEQA process. BCHD appreciates the focused comments provided on the Draft Environmental Impact Report (EIR).

Comment KB-2

The comment summarizes the construction haul routes and their relationship to the nearby schools within TUSD boundaries, including Towers Elementary School, West High School, and Magruder Middle School. The comment asserts that construction activities and construction vehicles have the potential to indirectly affect TUSD schools, particularly at these three campuses. Specifically, the comment raises issues regarding noise and vibration, exposure to hazardous materials, interruptions of drop-off / pick-up, and pedestrian-vehicle conflicts. The EIR thoroughly addresses the potential for impacts related to noise and vibration (refer to Section 3.11, *Noise*), exposure to

hazardous materials (refer to Section 3.8, *Hazards and Hazardous Materials*), and transportation-related safety issues (refer to Section 3.14, *Transportation*). The EIR also considers schools as sensitive receptors in each of these impact analyses as well as the impacts analyses for the other environmental topic areas in the EIR. Towers Elementary School and West High School are named and addressed in detail given their proximity to the Project site. Magruder Middle school is located adjacent to the inbound construction route and is also considered a sensitive receptor – along with other residences, schools, recreational land uses, medical facilities, and places of worship – though is not specifically named.

Comment KB-3

The comment states that the proposed haul routes do not fully comply with the truck routes that have been adopted by the City of Torrance. Specifically, the comment identifies that two segments that are not shown on the City of Torrance Established Truck Routes map:

- The segment of Beryl Street, between Flagler Lane and West 190th Street, adjacent to Towers Elementary School.
- The segment of Prairie Avenue, between West 190th Street and Artesia Boulevard, adjacent to Magruder Middle School.

The comment requests that these street segments be eliminated as proposed haul routes. In response to this request from TUSD, the proposed haul routes have been revised in the Final EIR as follows:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from Flagler Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards I-405.
- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesia Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto

Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.

- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

TUSD has acknowledged in the comment that these revisions would reduce potential impacts at Towers Elementary School and eliminate potential impacts and Magruder Middle School. BCHD has incorporated these suggested revisions in keeping with Mitigation Measure (MM) T-2, which requires that the proposed haul routes are “...consistent with the Redondo Beach and Torrance General Plan designations.” Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Comment KB-4

The comment requests that the proposed construction activities that generate the greatest noise and vibration impacts (i.e., building, demolition, and grading activities) occur when students are not in school. The comment suggested that these activities would be most appropriate on Saturdays or during school breaks. The comment further requests that for those activities that cannot be scheduled outside of school hours, BCHD should coordinate with the Principal of Towers Elementary to ensure that construction noise and vibration impacts do not occur on important test days.

First, it is important to note that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Further as described in Section 3.11, *Noise* under Impact NOI-2, ground-borne vibration levels generated during construction would not affect or be noticeable to any sensitive receptors during construction. Therefore, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the BCHD campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions. The Construction Noise Management Plan would restrict the hours

of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. Additionally, at least 1 month prior to the initiation of construction-related activities during Phase 1 and Phase 2, BCHD shall prepare and distribute notices to those located within a 0.25-mile radius. BCHD is committed to ongoing coordination and revisions to the construction schedule, as feasible, ahead of and during the proposed construction activities, to protect and maintain the indoor learning environment at Towers Elementary School.

Comment KB-5

The comment correctly describes that the proposed weekday construction schedule of 7:30 a.m. to 6:00 p.m. (which is consistent with Redondo Beach Municipal Code [RBMC] Section 4-24.503 and Torrance Municipal Code [TMC] Section 6-46.3.1) and asserts that construction-related traffic would disrupt and delay drop-off and pick-up activities at nearby TUSD campuses. The comment requests that MM NOI-1 be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Towers Elementary School and West High School. Potential construction-related traffic and pedestrian-vehicle safety issues are thoroughly addressed under Impact T-3. As required by MM T-2, BCHD would be required to prepare a Construction Traffic and Access Management Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. As a requirement of the Construction Traffic and Access Management Plan BCHD shall be required to provide timely notification and coordinate construction schedules with all affected agencies and parties within a radius of 500 feet, including Towers Elementary School.

Importantly, it should be noted that the Construction Traffic and Access Management Plan limits work within the public right-of-way to the period between 9:00 a.m. and 4:00 p.m. (This work includes dirt and demolition material hauling and construction material delivery.) The request to limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School will require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different

grades (e.g., between 1st grade and 5th grade), and are not the same between the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1 and MM T-2, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Letter PF

June 3, 2021
Patrick Furey, Mayor
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

Comment PF-1

The comment introduces the attached letter from the City of Torrance Mayor, Patrick Furey, and comments. This comment has been received and incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments.

Comment PF-2

The comment expresses appreciation for being notified of the Draft EIR and states the City of Torrance has prepared comments on and recommendations for the Draft EIR. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

Comment PF-3

The comment expresses concern for the Torrance residents living east of the Project site and requests consideration of additional alternatives and mitigation measure to reduce the potential impacts, such as repositioning the Residential Care for the Elderly (RCFE) Building further west, which each floor stepping back farther from Flagler Lane as building height increases and removing Project site access from Flagler Lane. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

With regard to the proposed site plan associated with the RCFE Building, it should be noted that the Beach Cities Health District (BCHD) has already revised the building footprint to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. As summarized in Master Response 9 – Aesthetics and Visual Resources Analysis, the 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

BCHD is unable to locate the building footprint further to the west due to the constraints associated with the existing BCHD campus. The building footprint must accommodate the continued operation of the Beach Cities Health Center as well as the Providence Little Company of Mary Medical Institute Building. The site plan must also accommodate internal circulation roads and pathways between these buildings. Further, while BCHD is considering ways to accommodate floor to ceiling height reductions to achieve Mitigation Measure (MM) VIS-1, additional setbacks in the RCFE Building cannot be accommodated without a substantial reduction in Assisted Living units and Memory Care units. As previously noted the number of units was already reduced by nearly 50 percent. Further reductions would not achieve the project objectives related to revenue generation, based in part on the three market studies prepared by MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, and independently reviewed by Cain Brothers (refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units). Additional discussion has been added to Section 5.4, *Alternatives Considered but Rejected from Further Analysis* to further describe these constraints.

As acknowledged in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with Torrance Municipal Code (TMC) Section 92.30.8, which prohibits site access to commercial properties from local

streets when access from an arterial road is available. BCHD also recognizes that the City of Torrance is also now considering the potential removal of the southbound vehicle movement along Flagler Lane between Beryl Street and Towers Street and that this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. Therefore, Alternatives 3, 4, 5, and 6 would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane (refer to Section 5.5, *Alternatives Analysis*).

Comment PF-4

The comment asserts that the environmental analysis of the Phase 2 development program is vague. As discussed in Section 1.1, *Overview*, the EIR evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. This approach to analysis is not uncommon, and is in fact specifically called for under California Environmental Quality Act (CEQA) Guidelines Section 15165. Refer to BCHD Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to this issue. As described there in, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Comment PF-5

The comment expresses appreciation for attention to these comments and introduces additional comments that the City of Torrance received on the Draft EIR, provided as Attachment B to Letter PF. These comments have been received, reviewed, and found to be duplicative with the comments that have been individually submitted on the Draft EIR. For example, the comments provided by

Torrance Redondo Against Overdevelopment are directly responded to in Letter TRAO (see Section 8.3.3, *Neighborhood Organizations*).

Comment PF-6

The comment notes that Table ES-2 and Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

Comment PF-7

The comment asserts that the description of zoning surrounding the Project site is incorrect. Section 2.2.2, *Surrounding Land Uses* of the EIR has been revised, as requested, to describe the zoning surrounding the Project site, in addition to the General Plan land use designations. However, it should be noted that the environmental impact analysis provided throughout the EIR already considers these adjacent residences as well as Towers Elementary School to be sensitive receptors (e.g., refer to Table 3.11-16 and Table 3.11-17 in Section 3.11, *Noise*).

Comment PF-8

The comment states that the Draft EIR incorrectly references TMC Section 13.9.7 as the sole decision-making body of the City of Torrance for the proposed RCFE Building and states that the retaining walls located in Torrance right-of-way would be subject to discretionary review by the Torrance Planning Commission per TMC Section 92.13.12(d). To clarify, Section 2.5.1.2, *Project Architecture and Design* of the Draft EIR does not state that TMC Section 13.9.7 is the sole decision-making body of the City of Torrance for the proposed RCFE Building, but rather describes the applicable policies and regulations for the RCFE Building. In fact, Section 1.5, *Required Approvals* specifically acknowledges that the proposed Project would require “*City Engineer approval of a building permit for retaining walls associated with the service area and loading dock entry/exit pursuant to TMC Section 92.13.2 (Torrance Engineering Division)*.”

Comment PF-9

The comment states that coordination with the Torrance Fire Department (TFD) and the Torrance Police Department (TPD) is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, given that Flagler Lane is within the City of Torrance. Section 2.5.1.3, *Proposed Access, Circulation, and Parking* of the Draft EIR has been revised to clarify that BCHD would coordinate with the TFD and TPD to prepare an Emergency Response Plan for elements of the proposed Project within the jurisdiction of the City

of Torrance. Refer to the response to Comment PF-3 regarding the proposed access along Flagler Lane.

Comment PF-10

The comment states that the proposed construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. The construction haul routes proposed in the Draft EIR have been revised to avoid construction traffic conflicts. The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element. Refer to the response to Comment KB-3 as well as the Master Response 13 – Transportation Analysis for additional detailed discussion and response to comments pertaining to the revised construction haul routes.

Comment PF-11

The comment asserts that the description of the environmental setting along Flagler Lane is incomplete and must include descriptions of the single-family residential neighborhood to the east of the Project site and the school drop-offs and pick-ups at Towers Elementary School. Section 3.1.1, *Environmental Setting* of the Draft EIR has been revised to describe that between Beryl Street and Towers Street, Flagler Lane supports single-family residences within the City of Torrance as well as school drop-offs and pick-ups at Towers Elementary School. However, it should be noted that the EIR thoroughly describes the transportation network adjacent to the Project site within more applicable sections of the EIR (e.g., Section 3.14, *Transportation*).

Comment PF-12

The comment states that the City of Torrance was not consulted on the selection of representative views, and that the Draft EIR must consider the potential impacts to public views from locations at the cul-de-sac at Tomlee Avenue facing west and southwest, intersection at Towers Street and Mildred Avenue facing west, and intersection at Tomlee Avenue and Mildred Avenue facing west and northwest. However, for the following reasons, representative views from each of these locations were not selected to inform the analysis of aesthetics and visual resources in this EIR.

1. Cul-de-sac at Tomlee Avenue: Views from this location are largely obstructed by residential development and largely already represented by Representative View 2 located approximately 330 feet to the southwest of the cul-de-sac. Additionally, Representative

View 3, which is located 200 feet northwest of the cul-de-sac, provides direct uninterrupted views of the Project site at a location that is more heavily frequented by pedestrian foot traffic, bicycles, and vehicles.

2. Towers Street & Mildred Avenue Intersection: Views of the Project site from this location are located farther from the Project site and largely already represented by Representative View 3, which is located approximately 300 feet to the west. Representative View 2 (Towers Street & Flagler Lane) was selected as it provides a much more direct view of the Project site from the same view direction.
3. Tomlee Avenue & Mildred Avenue Intersection: As described for the Towers Street & Mildred Avenue intersection, views of the Project site from this location are farther from the Project site and largely already represented by Representative View 3, located approximately 230 feet to the west and closer to the Project site.

To fully and accurately assess potential impacts associated with aesthetics and visual resources, a total of six representative views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. Two of these representative views – Representative Views 1 and 2 – are located within the residential neighborhood located directly to the east of the Project site, within the City of Torrance, while Representative View 3 is located at the corner of Dominguez Park directly adjacent to City of Torrance boundary. Many views elsewhere within the City of Torrance are often further away and views of the Project site are largely obstructed by existing development, trees, and power lines. These representative views were selected as they provide some of the greatest and most direct views of the Project site within the City of Torrance and are generally representative of similar views from other areas within the City of Torrance. CEQA Guidelines Section 15151 states that “[a]n evaluation of environmental effects of a proposed project need not be exhaustive...”. This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide “...a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations” (CEQA Guidelines Section 15151).

Comment PF-13

The comment requests that the Draft EIR consider the potential Project impacts on surrounding property, specifically the residential neighborhood to the east, and the potential impact of the existing uses to the proposed Project in accordance with Torrance General Plan Land Use Element Policy 2.3. The Draft EIR does in fact consider the potential Project impacts on surrounding properties, including the residential neighborhood to the east of the Project site, throughout the EIR. For example, two of the six representative views analyzed under Impact VIS-2 in Section 3.1, *Aesthetics and Visual Resources* are located within this residential neighborhood to the east of the Project site. Residences within this neighborhood are also described as sensitive receptors in Section 3.2, *Air Quality* as well as Section 3.11, *Noise* and as such, air quality and noise impacts to these receptors are analyzed and mitigated to the maximum extent feasible in the EIR. Additionally, Section 3.14, *Transportation* of the Draft EIR describes the current level of cut-through traffic within this residential neighborhood and analyzes the potential for additional Project-related cut-through traffic during operation of the Project. Therefore, the Draft EIR does consider the potential for Project-related impacts on surrounding property, including the residential neighborhood to the east of the Project site, in accordance with Torrance General Plan Policy LU.2.3.

The comment also requests that the Draft EIR consider the potential impacts to landscape and hardscape buffers, specifically where the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate in accordance with Torrance General Plan Land Use Element Policy 2.5. Torrance General Plan Policy LU.2.5 states *“Establish landscape or hardscape buffers between residential and non-residential uses, where appropriate, to minimize adverse effects.”* As described in Section 2.5.1.1, *Proposed Uses* of the Draft EIR, *“The perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening.”* As described in Section 2.5.1.1, perimeter green space and landscaping would be intended to soften the campus interface and provide connections with the surrounding uses. Therefore, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts, consistent with Torrance General Plan Policy LU.2.5. Section 1.5, *Required Approvals*, also acknowledges that the Landscape Plan within the City of Torrance right-of-way would require *“approval pursuant to TMC Section 92.30.6 (Torrance Community Development Department).”*

Lastly, the comment states that the Torrance General Plan was adopted in 2010 and that Draft EIR incorrectly cites the Torrance General Plan as 2005. However, this 2005 reference is for the Torrance General Plan Land Use Policy Map, which uses GIS data from 2005 (refer to Section 7.0, *References*). Other references to the Torrance General Plan throughout the EIR (e.g., Section 3.10, *Land Use and Planning*) accurately describe that the adoption in 2010.

Comment PF-14

The comment corrects the numbering of Torrance General Plan Community Resources Element Policy CR.1.2 and Objectives CR.4 and CR.19, which were swapped in the Draft EIR. The regulatory setting has been revised to correctly reference Torrance General Plan Community Resources Element policies and objectives. Additionally, Policy CR.4.3 is included in Table 3.1.3 of the Draft EIR to describe the proposed Project's consistency with this policy; however, this policy has also been added to Section 3.1.2, *Regulatory Setting* as requested by this comment. As described in the response to Comment PF-13 above, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts, consistent with Torrance General Plan Policy LU.2.5 as well as Policy CR.4.3.

Comment PF-15

The comment states that the Draft EIR must include TMC Section 92.30.2 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east, from outside equipment and roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls on all Project buildings. TMC Section 92.30.2 has been added to the regulatory setting as requested by this comment. As described in Table 3.1.2, mechanical equipment included in the proposed Project would be sited away from public streets and would be screened by proposed landscaping and other screening devices consistent with the architecture and color of the proposed development. Therefore, the proposed mechanical equipment would be screened in compliance with RBMC Section 10-2.1530 as well as TMC Section 92.30.2.

The comment also claims that the EIR must include TMC Section 92.30.3, which includes restrictions on the enclosures of trash, loading, and storage areas to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane. However, as described in Section 2.5.1.4, *Utilities and Services*, trash and recycling collection facilities for residents, employees, and visitors would be provided within enclosures in the subterranean service and delivery zone below the RCFE Building. This area would not be located

within the City of Torrance right-of-way and would not be subject to TMC Section 92.30.3 (see also response to Comment PF-17). However, this element of the proposed Project would be subject to RBMC Section 10-5.1536 (Solid Waste Enclosures), which provides requirements for solid waste facilities, including the enclosures, material, access gate, and location of the solid waste facilities.

Comment PF-16

The comment requests that the Draft EIR consider further reduction of the RCFE Building height to preserve greater panoramic view of the Palos Verdes hills as currently viewed from Representative View 6 located at the Flagler Lane & 190th Street intersection and include visual aids/exhibits to demonstrate alternative methods for mitigation as well as the potential impacts to the existing view corridor resulting from Phase 2 development. However, the analysis in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 already provides a detailed computer-generated photosimulation demonstrating the potential impact to visual resources. Based on the Sight Line Study prepared by VIZf/x, the implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) at least 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). With this reduction, the maximum height of the proposed RCFE Building would rise to just below the ridgeline of the Palos Verdes hills from 190th Street and Flagler Lane. However, as described in MM VIS-1, this revision to the final design could include the removal of the uppermost stories of the building and/or recessing the building foundation further into the ground surface. While the preferred method would be to reduce the floor-to-ceiling heights to accommodate the height, a detailed design and 3D model has not yet been developed. Therefore, a detailed, photorealistic simulation cannot be prepared at this time. However, MM VIS-1 very clearly describes the requirements to reduce the impact to less than significant based on robust technical study independently prepared by a licensed architect (i.e., by avoiding the interruption of the Palos Verdes ridgeline when viewed from Representative View 6).

As described in Impact VIS-1, the Phase 2 development program would result in the construction of a new building(s) ranging in height from 53 feet to 68 feet above ground level and a new parking structure, reaching a maximum height of 76 feet. However, given the height of the proposed development in Phase 2, it would not be visible behind the proposed RCFE Building. Therefore, the Phase 2 development program would not affect the wide-ranging panoramic view of the Palos Verdes ridgeline from Representative View 6 and no further visual aids or analysis is required.

The comment also recommends consideration of alternative mitigation measures, such as methods for mitigation including repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street and Flagler Lane. However, repositioning the building or requiring stepbacks in height would not address the interruption of the Palos Verdes ridgeline. As described in Impact VIS-1 and MM VIS-1 a reduction in the total building height is required. Nevertheless, it should be noted that the proposed Project would be subject to a Planning Commission Design Review (Redondo Beach Municipal Code [RBMC] Section 10-2.1116) and these comments will be provided to the BCHD Board of Directors as well as the City of Redondo, as a responsible agency for consideration during deliberation on the proposed Healthy Living Campus Master Plan.

Comment PF-17

The comment claims that the analysis provided in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2 is not consistent with the Torrance General Plan and asserts that the proposed RCFE Building would change the visual character of the Project site. The comment specifically notes that the building would be visually prominent, substantially taller than the existing buildings on-site, and larger than the buildings in the vicinity.

It should be noted that the EIR very clearly acknowledges the height of the proposed building. For example, refer to Table 3.1-1 which describes the relationship of the proposed RCFE Building to other buildings within the Beach Cities and Torrance over 70 feet in height. As described for Representative View 2, Representative View 3, and Representative View 4, the proposed RCFE Building would be visually prominent and would noticeably alter the existing views of the Project site from these locations, including reducing blue sky views. However, the development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from these locations. In fact, the proposed Project includes many attributes that would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the BCHD campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern

California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm.

With regard to the Phase 2 of the proposed Healthy Living Campus Master Plan, the analysis provided in Impact VIS-2 does programmatically assess the proposed development. To accomplish this, the analysis uses visual renderings for three example site plans and describes the potential impacts associated with the maximum buildings heights. Take for example the discussion of the proposed parking structure when viewed from Representative View 1 within the City of Torrance:

“Each of the example site plan scenarios would involve the construction of a multi-level parking structure along the eastern perimeter of the Project site. This would result in a net increase in the overall height compared to the existing parking structure at 512 North Prospect Avenue, which currently provides 3 above ground levels. Under any of the example site plan scenarios the proposed parking structure would likely be visible from Representative View 1, located within the Torrance neighborhood to the east of the BCHD campus. However, at a maximum height of 81 feet, this parking structure would be more than 20 feet shorter than the proposed RCFE Building. As such, the parking structure would be just barely visible over the single-family houses and would not substantially obscure the view of the open sky above.”

Refer to the response to Comment PF-3 regarding the suggest repositioning or stepdown in building heights.

Comment PF-18

The comment expresses concern regarding lighting impacts to the residential neighborhood east of the Project site, including from surface level parking lot, building, and landscape lighting. The surface parking lots associated with the proposed Project would be located at the southern and western portions of the Project site would not affect residences to the east of the Project site within the City of Torrance given the distance, change in elevation, and obstruction of buildings onsite. As described in Impact VIS-3, outdoor lighting at the Project site would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with TMC Section 92.30.5 and these design guidelines. Lighting onsite would also be screened by proposed trees and landscaping. The parking structure developed in Phase 2 of the proposed Project would rise to a maximum height of 81 feet and would be visible by the adjacent sensitive receptors to the east within the City of Torrance. However, the parking structure would include standard treatments

to avoid light spillover, including: 1) solid parapet walls at least 42 inches high at each garage level and ramps; 2) planted screening at lower floor levels; and 3) screening at openings for upper levels.

Lighting within the City of Torrance right-of-way would also comply with TMC Section 92.30.5, which limits the intensity and impacts of night lighting and requires lighting be directed away from all surrounding residential land uses. Compliance with the Redondo Beach Design Guidelines and the TMC would ensure the new light sources associated with the proposed Project would not substantially affect off-site light-sensitive receptors surrounding the Project site..

Comment PF-19

The comment states that Impact VIS-4 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to existing and future solar collectors atop single-family residences located in the residential neighborhood to the east. Section 3.1.1, *Environmental Setting* of the EIR has been revised to more specifically describe the existing solar collectors atop single-family residences located in the neighborhood to the east of the Project site. However, these residences are already included in the list of shade-sensitive receptors considered in Impact VIS-4. As described in Impact VIS-4 shadow-sensitive land uses adjacent to the Project site consist of residential buildings, including windows and private yards at most houses, Towers Elementary School to the east, and Dominguez Park to the northeast. The vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the BCHD campus and the Torrance residences below. Shadow-sensitive uses, including the existing residences and associated rooftop solar collectors, to the east of the Project site would not be shaded by the proposed structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be less than significant.

Comment PF-20

The comment describes the threat of urban coyotes in the region and recommends considering California native plant species and drought-tolerant planting in an exposed planting plan to avoid attracting habitat for urban coyotes. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would landscape the Project site with a mix of drought-resistant grasses,

shrubs, indigenous ground cover, and native shade trees consistent with the existing landscaping on-site and in the vicinity (refer to Figure 2-9). Further, as described in Section 1.5, *Required Approvals* of the EIR, the proposed Landscape Plan for the Project would require approval from the Torrance Community Development Department pursuant to TMC Section 92.30.6. BCHD is committed to working collaboratively with the City of Torrance to develop a Landscape Plan that is suitable for approval.

Comment PF-21

The comment incorrectly claims that the EIR neglects to identify and analyze the slope and series of retaining walls along the eastern border of the Project site. Existing geologic and soils hazards at the Project site, including but not limited to liquefaction, landslides, slope instability, subsidence, and differential settlement, were thoroughly assessed based on the Geotechnical Report prepared by Converse Consultants (2016) and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation, and California Emergency Management Agency (Cal EMA). Section 3.6, *Geology and Soils* specifically describes under Impact GEO-1:

“...according to the CGS Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone (CGS 2019a). Similarly, according to the Redondo Beach Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides (City of Redondo Beach 2019). Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very low (Converse Consultants 2016). Therefore, required compliance with the CBC would ensure that potential impacts associated with landslides would be less than significant.”

Comment PF-22

The comment requests coordination with the TFD and TPD to prepare an Emergency Response Plan for emergency access on Flagler Lane. Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials* of the EIR has been revised to clarify that BCHD would coordinate with the TFD and TPD to prepare an Emergency Response Plan for elements of the proposed Project within the jurisdiction of the City of Torrance.

Comment PF-23

The comment states that Impact LU-1 is not consistent with the Torrance General Plan and conflicts with the TMC. The goes on to claim that the EIR errors in stating the analysis of potential conflicts with the Torrance General Plan are limited to the proposed development within the City of Torrance right-of-way, and that the EIR should consider the entirety of the Project for potential conflicts with the Torrance General Plan. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way, which are relatively minor components of the proposed Project, would require permits issued by the City of Torrance. However, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the BCHD campus beyond the municipal boundaries. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are thoroughly addressed in Section 3.10-5. Final determination of consistency with individual policies will be the responsibility of the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. Nevertheless, as required under CEQA, the EIR discloses and discusses potential consistency with such policies for consideration by City decision-makers and staff.

Comment PF-24

The comment states that the Draft EIR must include TMC Section 92.30.2 and 92.30.3 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east. Refer to the response to Comment PF-23. As described therein, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the BCHD campus beyond the municipal boundaries.

Comment PF-25

The comment asserts that the EIR must include is subject to TMC Section 92.13.12(d), which states that no fence, wall or hedge shall exceed eight feet and five feet in height, respectively. Refer to the response to Comment PF-8.

Comment PF-26

The comment incorrectly claims the EIR understates the conflict with access to Flagler Lane and does not consider other Project alternatives that do not access Flagler Lane. However, as noted in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives*, the one-way driveway and

pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. Refer to the response to Comment PF-3.

Comment PF-27

The comment requests specification in MM NOI-1 that construction is prohibited on Sundays and Holidays observed by Torrance City Hall per TMC Section 6-46.3.1, and that the arrival times of workers, construction vehicles and materials should adhere to the allowable hours as specified. MM NOI-1 does specify that *“Construction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday to the maximum extent feasible, in accordance with RBMC Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1.”* MM NOI-1 also notes that the Construction Noise Management Plan would require approval by the Torrance Building & Safety Division, in accordance with TMC Section 46.3.1, for construction activities occurring within the City of Torrance jurisdiction. BCHD is committed to working collaboratively with the City of Torrance to develop a Construction Noise Management Plan that is suitable for approval.

The comment also requests identification in MM NOI-1 of which agency will enforce construction noise violations and respond to noise complaints. The CEQA Guidelines provide that *“...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].”* A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. As described in MM NOI-1, *“BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues.”*

The comment also recommends consideration of additional methods to mitigate significant and avoidable construction noise impacts, such as repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases. Refer to the response to Comment PF-3.

Comment PF-28

The comment states that the proposed construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. Refer to the response to Comment PF-10.

Comment PF-29

The comment states that pursuant to TMC Section 46.7.2(c) residential and commercial noise limits are adjusted during certain noise conditions. The comment recommends that the EIR consider these noise limit adjustments to identify potential operational noise impacts. The comment also recommends considering additional methods for mitigation of operational noise levels from outdoor events, such as restricting amplified noise at outdoor events to between 7:00 a.m. to 7:00 p.m. Sunday through Thursday and 7:00 a.m. to 10:00 p.m. on Friday and Saturday, and limiting the number of outdoor events altogether. The EIR acknowledges that BCHD would be responsible for compliance with the applicable local noise ordinances. MM NOI-3b specifically states, “[t]he Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the RBMC and TMC.” Additionally, MM NOI-3c would require the proposed Aquatics Center to “close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria.” The elimination of outdoor activities BCHD campus is neither warranted nor required to comply with the applicable local noise ordinance.

The comment recommends considering methods to reduce operational noise impacts such as repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases. As described in Section 3.11, *Noise*, operational noise associated with the Project would primarily be related to heating, ventilation, and air conditioning (HVAC) equipment, the proposed electrical yard, delivery and service trucks, emergency vehicles, parking operations in the proposed parking lot and parking garage, roadway noise, and the proposed outdoor function areas. Noise from the delivery and service trucks and the proposed outdoor function areas are the only sources of operational noise considered to have the potential to result in significant noise impacts at sensitive receptors. Implementation of MM NOI-3a (Delivery Truck Hours and Idling) and MM NOI-3b (Events Management Plan) would reduce noise levels resulting from operation of the proposed Project. Additionally, MM NOI-3c (Outdoor Pool Activities) would require the Aquatics Center, specifically the outdoor pool and deck area would close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria. As such, the required mitigation measures in Section 3.11, *Noise* sufficiently mitigate operational

noise to less than significant levels and additional measures are not needed to mitigate operational noise levels from the RCFE Building.

Comment PF-31

The comment recommends considering methods to reduce operational noise impacts from the proposed parking structure, such as covering driving surfaces with materials that reduce noise from tires and lining the parking structure exterior with screening materials (e.g., screen wall with planters). As described in Section 3.11, *Noise*, due to the relatively high level of traffic noise along streets in the vicinity of the Project site, normal daytime parking garage L_{eq} noise of 56 dBA would likely be imperceptible. Therefore, noise impacts relating to parking operations would result in less than significant operational noise impacts. Additionally, as previously described, the perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees to provide landscape screening. This proposed Project landscaping would further reduce noise levels associated with the operation of the proposed parking garage. Additional measures are not needed to mitigate operational noise levels from the RCFE Building.

Comment PF-32

The comment requests elimination of the proposed driveways on Flagler Lane and revision of the entire EIR and appendices to implement this change. However, the EIR notes in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives* that the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. As such, Section 5.0, *Alternatives* considers four Project alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane.

The comment also requests clearly stating that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and is not a mitigation for any cut-through traffic that the proposed development will introduce. However, it is clearly stated in the Environmental Setting of Section 3.14, *Transportation* that existing cut-through traffic between Beryl Street and Del Amo Boulevard associated with commuting as well as student pick-up and drop-off at Towers Elementary School is a safety concern and that the City of Torrance is currently planning to pilot a temporary one-way partial closure of southbound traffic on Flagler Lane between Towers Street and Beryl Street to reduce existing cut-through traffic and associated safety risks between Beryl Street and Del Amo Boulevard. The EIR does not imply that this pilot

is in any way connected to the proposed Project. Further, the EIR does not imply that this pilot planned by the City of Torrance is a mitigation for cut-through traffic. As described in Section 3.14, *Transportation*, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by taking a right off of Flagler Lane and exit taking a left turn onto northbound Flagler Lane. Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to long-term parking on the BCHD campus and as such, would not be a primary entrance. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood. Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation, the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods. Therefore, the proposed Project would not contribute to operational safety hazards related to cut-through traffic and does not require mitigation for cut-through traffic.

Additionally, the Cumulative Impacts discussion in Section 3.14, *Transportation* notes that if the City of Torrance's temporary one-way closure of southbound traffic on Flagler Lane is successful and neighborhood residents support it, the one-way closure could become permanent. This would preclude access for service and delivery vehicles to the subterranean proposed service area and loading dock beneath the RCFE Building. Therefore, service and delivery vehicles would be required to drive through the Torrance neighborhood to travel north on Flagler Lane and turn left into the service area and loading dock entrance. Thus, the permanent closure of southbound traffic on Flagler Lane south of Beryl Street would require service and delivery vehicles to cut-through the Torrance neighborhood and would present a potential conflict associated with cut-through traffic. For this reason, an alternative to the proposed Project with a revised access and circulation scheme is considered under Alternatives 3, 4, 5, and 6 in Section 5.0, *Alternatives*.

Comment PF-33

The comment requests that the EIR emphasize that the BCHD Bike Path Project is independent of the proposed Project, and is already funded through a Measure M Metro Sustainability

Implementation Plan Grant, and will be implemented regardless of this Project's approval provided all necessary environmental clearances and approvals are secured from the cities of Redondo Beach and Torrance. As described in the Cumulative Impacts discussion of Section 3.14, *Transportation*, "BCHD is coordinating the BCHD Bike Path Project (separate from the proposed Project) with the City of Redondo Beach and the City of Torrance to develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street." This discussion has been revised to clarify the grant funding source to further substantiate that these are two separate and distinct projects.

Comment PF-34

The comment states that the proposed construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. Refer to the response to Comment PF-10.

Comment PF-35

The comment requests elimination of the proposed driveways on Flagler Lane and revision of the project trip distribution to implement this change. As previously noted in response to Comment PF-32, the EIR notes in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives* that the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. As such, Section 5.0, *Alternatives* considers four Project alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. For further detail on Project Alternatives, see Section 5.0, *Alternatives*.

Comment PF-36

The comment requests that the thresholds in the Non-CEQA Intersection Operational Evaluation (see Appendix J) be consistent with those provided by the City of Torrance in its July 29, 2019 comment letter. These thresholds have been reviewed for consistency with the July 29, 2019 comment letter and updated, where necessary.

Comment PF-37

The comment requests providing additional information that Flagler Lane south of Beryl Street is a local street. The EIR does note the designation of Flagler Lane south of Beryl Street as a local

street in Section 3.14.1, *Environmental Setting*. The description of Flagler Lane has been revised to further clarify that Flagler Lane is considered a local street between Towers Street and Beryl Street.

Comment PF-38

The comment states that coordination with the TFD and TPD is required to prepare an Emergency Response Plan. Refer to the response to Comment PF-9.

Comment PF-39

The comment requests clearly stating that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and is not a mitigation for any cut-through traffic that the proposed development will introduce. Refer to the response to Comment PF-32.

Comment PF-40

The comment recommends consideration of repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street and Flagler Lane. Refer to the response to Comment PF-3.

Comment PF-41

The comment requests visual aids/exhibits for Alternative 6 to demonstrate the reduced height and again recommends consideration of repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street & Flagler Lane. An exhibit of Alternative 6 is provided in Figure 5-2; however, as described for MM VIS-1, a detailed design and 3D model has not yet been developed for Alternative 6. Nevertheless, given that the alternative would reduce the height of the building by more than the required 20 feet and 3 inches identified in the Sight Line Study prepared by VIZf/x, this alternative would clearly avoid the impact described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1.

Comment PF-42

The comment notes that Table ES-2 and Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in Tables ES-2 and 5.5-5; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

Letter WB

June 8, 2021
William Brand, Mayor
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

Comment WB-1

The comment expresses appreciation for being notified of the Draft Environmental Impact Report (EIR) and states the City of Redondo Beach has prepared comments for consideration in the Final EIR. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

Comment WB-2

The comment provides a summary of the proposed Project, including the Phase 1 site development plan and the Phase 2 development program. Again, this comment has been received and incorporated into the Final EIR as a part of the responses to comments.

Comment WB-3

The comment recognizes that the Phase 2 development program was evaluated at a programmatic level, but that there are details of the development program that were not analyzed. The comment requests that any future consideration of Phase 2 should begin with a Subsequent EIR. As discussed in Section 1.1, *Overview*, the EIR evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. This approach to analysis is not uncommon, and is in fact specifically called for under California Environmental Quality Act (CEQA) Guidelines Section 15165. Refer to BCHD Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to this issue. As described there in, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not*”

analyzed as significant effects on the environment in the prior environmental impact report” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Comment WB-4

The comment states the EIR does not address how MM VIS-1 would be met under the proposed Project, including how or if the same square footage would be constructed and distributed across the Project site. As described in Section 3.1, *Aesthetics and Visual Resources*, MM VIS-1 is proposed to reduce Project impacts on aesthetics and visual resources. Based on the Sight Line Study prepared by VIZf/x, the implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) to approximately 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). This could be addressed through a reduction in the floor-to-floor ceiling height, recession of the building into the ground surface, or removal of the uppermost stories. In the case that the uppermost stories were removed under MM VIS-1, this square footage would not be redistributed across the Project site.

As stated in Section 5.5.6, *Alternative 6 – Reduced Height Alternative*, Alternative 6 is separately considered due to the fact that the financial feasibility of implementing MM VIS-1 was not certain at the time that the Draft EIR was prepared. A reduction in floor height would remove programmable revenue-generating space in the RCFE Building and excavation to recess the building further below the ground surface would be costly. Therefore, in the event that MM VIS-1 could not be implemented an alternative would be available to the BCHD Board of Director to avoid the potentially significant impact to scenic vistas identified in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1

Comment WB-5

The comment recommends that the EIR provide an alternative that addresses meeting the restriction of 0.5 floor area ratio (FAR) in the C-2 zoned parcel (i.e., the vacant Flagler Lot) should the distinct criteria for the zoning variance not be met. It should be noted that since the release of the Draft EIR and the receipt of this comment, revisions to the building footprint and associated FAR have been incorporated by pulling the building footprint further back from Beryl Street. These revisions are described in Section 2.0, *Project Description* of the Final EIR. This minor revision does not meet any of the triggers for recirculation described under California

Environmental Quality Act (CEQA) Guidelines 15088.5. It should also be noted that each of the alternatives described in Section 5.0, *Alternatives* already meets the 0.5 FAR in the C-2 zoned parcel.

Comment WB-6

The comment requests that the EIR address the uncertainty resulting from discretion of the Planning Commission for the allowable FAR, maximum height restrictions, and setbacks in the P-CF Zone during Planning Commission Design Review. The EIR appropriately describes a reduction in height of the proposed RCFE Building necessary to avoid a potentially significant impact to scenic resources. However, as described further in Master Response 9 – Aesthetics and Visual Resources the analysis does not find any other potentially significant impacts that would warrant further reductions in building height or additional setbacks. Alternative 6 provides a reduced height alternative in the event that the decision-makers determine that MM VIS-1 cannot feasibly be implemented. Therefore, while BCHD acknowledges the City’s discretion in the Planning Commission Design Review, the EIR is not required to speculate on the potential outcomes.

Comment WB-7

The comment expresses appreciation for attention to these comments and introduces the comments on the Draft EIR in Attachment A. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

Comment WB-8

The comment recommends listing the reports and plans required as part of mitigation measures along with the timing and requirements of the reports/plans. Consistent with CEQA Guidelines Section 15097, a complete list of all mitigation measures required for the proposed Project, including required reports, timing, and other requirements of the mitigations, are provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring and reporting actions are identified in Table 11-1.

Comment WB-9

The comment notes that RBMC Section 10-5 is the zoning code for areas within the California Coastal Zone and states that RBMC Section 10-2 is the zoning code applicable to the Project site. After a detailed review, references to RBMC Section 10-5 in the Draft EIR were found only in Section 3.1.2, *Regulatory Setting*. References to RBMC Section 10-5 have been updated to the equivalent policies provided in RBMC Section 10-2, where applicable.

Comment WB-10

The comment claims that there is no enforcement for MM GEO-2b, which requires that, in the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made. However, if workers do not cease grading in the vicinity of the find, the workers and construction contractor would be subject to penalties under the applicable Federal, State, and local laws. As described in Section 3.6.3, *Impact Assessment and Methodology*, the methodology of the paleontological resources analysis is consistent with the Society of Vertebrate Paleontology (SVP) *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. As described in SVP's guidelines, non-paleontologists may monitor for fossils for excavations in rock units determined by a qualified professional paleontologist to have low potential, such as the Quaternary-aged alluvium deposits within the Project site. If potential paleontological resources are discovered during excavations in a rock unit with low potential, all ground disturbance in the vicinity of the find should stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate salvage, treatment, and future monitoring and mitigation. Therefore, MM GEO-2b is consistent with the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*.

Comment WB-11

The comment claims it is unclear why MM NOI-1 states that compliance with the City's construction hour regulations would be followed "to the maximum extent feasible." This mitigation measure has been revised to simply state that the proposed construction activities would comply with the RBMC Sections 4-24.503. However, it should be noted that RBMC Section 4.24-503 does provide limited provisions for the Building Official to permit construction activity during periods prohibited by subsection (a).

Comment WB-12

The comment clarifies that the Redondo Beach Public Works Department, Engineering Division is responsible for issuing after-hours construction permits. MM NOI-1 has been revised for clarification.

Comment WB-13

The comment state that approvals have different timeframes for various agencies and City divisions and that MM T-2 identified in the EIR should not limit an agency to a specific timeframe. MM T-2 does not limit an agency to a specific timeframe as the comment suggests, but rather MM T-2 specifies that BCHD must coordinate construction with affected agencies in advance of start of work. MM T-2 has been revised in the Final EIR to clarify that required City approvals may take up to 2 weeks or longer for each submittal.

Comment WB-14

The comment notes that there is no mention of compliance with the City’s adopted Model Water Efficiency Landscape Ordinance in the Executive Summary. The Regulatory Setting in Section 3.15, *Utilities and Service Systems* provides RBMC Section 10-2.1900 (Landscaping Regulations), which adopts the California State Model Water Efficiency Landscape Ordinance by reference. Further, as described in Section 1.5, *Required Approvals* of the EIR, the proposed Landscape Plan for the Project would require approval from the Redondo Beach Building & Safety Division pursuant to RBMC Section 10-2.1900. BCHD is committed to working collaboratively with the City of Redondo Beach to develop a Landscape Plan that is suitable for approval.

Comment WB-15

The comment notes that Table ES-2 of the Draft EIR does not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in Tables ES-2 and 5.5-5; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

Comment WB-16

The comment claims that the Reader’s Guide does not explain if the 0.30 to 1.50 inches of rainfall is the rate or the total and requests this be clarified in the Final EIR. As discussed in Section 3.9, *Hydrology and Water Quality*, the 85th percentile 24-hour rain event is expected to result in 0.30 to 1.50 inches of rainfall. Therefore, the 0.30 to 1.50 inches of rainfall is the rate of rain during a 24-hour period. Section 3.9 of the Reader’s Guide has been revised to clarify the rate of rainfall described.

Comment WB-17

The comment claims that the EIR does not mention the required Planning Commission Design Review and that permits are only described for the P-CF zone. The required Planning Commission

Design Review pursuant to RBMC Section 10-2.1806 is described in Section 1.5, *Required Approvals*. Section 1.5 has been revised to clarify that the proposed development within the C-2 zone also requires a CUP.

Comment WB-18

The comment states that shared parking is overseen by the Redondo Beach Planning Division, rather than the Building & Safety Division. This comment has been noted and Section 1.5, *Required Approvals* has been revised to clarify the correct city division for oversight of shared parking.

Comment WB-19

The comment claims that the EIR does not describe whether the proposed bicycle facilities would be available to the general public or to BCHD employees only. As described in Section 3.14, *Transportation*, bicycle parking would be provided for both visitors and employees of the proposed campus. Specifically, as described in MM T-1, BCHD would be required to expand the proposed on-site bicycle facilities (i.e., shower, racks, and lockers) for BCHD employees as well as maintain and expand onsite bicycle parking for BCHD visitors in an amount and location informed by visitor surveys and annual monitoring reports. Further, as described in Section 2.5.2.1, *Proposed Uses*, the proposed Aquatics Center would include dressing rooms with lockers, restrooms, and showers for campus visitors.

Comment WB-20

The comment claims that a gas yard is shown on site plans but is not described in the EIR and impacts from the gas yard should be evaluated. As shown in the site plans and noted by the “(E)” next to the label for the gas yard, the gas yard is an existing feature on the Project site adjacent to the east of the existing parking structure and the perimeter road. The gas yard would not be demolished, relocated, or otherwise affected during Project construction. Therefore, no impacts would result from the existing gas yard on-site.

Comment WB-21

The comment requests the EIR include an analysis of impacts of the proposed electrical yard. Refer to Master Response 12 – Noise Analysis as well as Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electric Yard for a detailed discussion and response to comments pertaining to this issue.

Comment WB-22

The comment provides recommendations for construction activities, including using the southerly and northerly driveways along North Prospect Avenue for construction vehicles (rather than the central driveway) and considering interim preferential parking along specific westerly North Prospect Avenue (Beryl to Diamond), North Prospect Avenue frontage road, and surrounding streets (i.e., first blocks of Diamond and Beryl) to keep BCHD employees, guests/visitors and construction workers from parking in the residential neighborhood streets. These recommendations have been noted. As described in Section 3.14, *Transportation*, BCHD shall prepare, implement, and maintain a Construction Traffic and Access Management Plan subject to review and approval by the Redondo Beach Engineering Division. BCHD is committed to working collaboratively with the City of Redondo Beach to develop a Construction Traffic and Access Management Plan that is suitable for approval.

The comment also recommends providing dust and noise screening/blankets along the perimeter of the Project site. The EIR provides mitigations that would require dust and noise suppression at the Project site during construction. For example, as described in Section 3.2, *Air Quality*, MM AQ-1 would require several measures during all construction activities to control dust, including quick replacement of ground cover in exposed areas; watering of all exposed surfaces and unpaved haul roads three times daily; covering all stock piles with tarp; limiting traffic to 15 miles per hour (mph) or less on unpaved roads; prohibiting demolition when wind speed is greater than 25 mph; sweeping streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads; covering or having water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas; and installing wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip. Additionally, MM NOI-1 would require the construction of noise barriers to reduce noise levels to on- and off-site sensitive receptors as well as other construction noise best management practices (BMPs) and measures to reduce construction noise levels.

Comment WB-23

The comment requests a list of the reports and plans required as part of mitigation measures along with the timing and requirements of the reports/plans. As described in respond to Comment WB-8, a list of all mitigation measures required for the proposed Project, including required reports, timing, and other requirements of the mitigations, is provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring and reporting actions are identified it Table 11-1.

Comment WB-24

The comment recommends adding Redondo Beach General Plan Land Use Element Goal 1K, Objective 1.46, and Objective 1.53 to the Regulatory Setting in Section 3.1, *Aesthetics and Visual Resources*, as they relate to the goals and policies already included in Section 3.1. These goals and objectives have been added to Section 3.1, *Aesthetics and Visual Resources* as recommended.

Comment WB-25

The comment states that Redondo Beach General Plan Parks and Recreation Element Policy 8.2a.8 is only applicable to the Coastal Area of the city and therefore, is not applicable to the Project site. Policy 8.2a.8 has been removed from Section 3.1.2, *Regulatory Setting* as well as from Table 3.1.2.

Comment WB-26

The comment states that implementation of MM VIS-1 would reduce impacts related to privacy and shade/shadow effects, which should be discussed in the Residual Impacts discussion under Impact VIS-1. As described further in Master Comment Response 9 – Aesthetics and Visual Resources Analysis, CEQA requires an assessment of impacts to public views rather than private views and privacy, and the RCFE Building would not create direct sight lines into private interior living spaces of nearby Torrance residences due to the distance and high angle of the views. As described in Impacts VIS-4, shade/shadow effects associated with the RCFE Building were determined to be less than significant. Nevertheless, the Residual Impacts discussion under Impact VIS-1 and the discussion in Impact VIS-4 have been revised to describe that implementation of MM VIS-1 would further reduce impacts related to shade and shadow.

The comment also incorrectly claims that the EIR does not analyze the reduced height as a Project alternative. The EIR analyzes the potential impacts of Alternative 6 – Reduce Height Alternative in Section 5.0, *Alternatives*. Under Alternative 6, approximately 88,800 sf of building space would be removed from the top 2 stories of the RCFE Building to avoid the potentially significant impact to scenic vistas identified in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1. Refer to the response to Comment WB-4.

Comment WB-27

The comment claims that Redondo Beach General Plan Parks and Recreation Element should not be applicable to the Project site since it is not dedicated parkland. This comment has been noted. The Redondo Beach General Plan Parks and Recreation Element has been removed from the analysis in Section 3.1, *Aesthetics and Visual Resources*.

Comment WB-28

The comment incorrectly states that the EIR describes a 121.5-foot tall building and a 133.5-foot tall building, both of which creating a 404.5-foot shadow during the Winter Solstice. This typographical error has been corrected. The City of Los Angeles CEQA Thresholds Guide (2006) states as an example of shadow multipliers that:

“The shadow length multiplier values represent the length of a shadow proportional to the height of a given building, at specific times of day. Hence, a building of 100 feet in height would cast a shadow 303 feet long at 9:00 a.m. during the Winter Solstice.”

Impact VIS-4 correctly describes that the RCFE Building would reach a maximum height of 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below. This single building is projected to cast shadows up to 404.5 feet long during the Winter Solstice.

Comment WB-29

The comment requests that the Draft EIR provide additional visual aids/exhibits of the proposed Project and alternatives to demonstrate compliance with referenced city goals, objectives, and policies. Section 3.1, *Aesthetics and Visual Resources* currently provides photosimulations of the proposed Project from six different representative views, which were selected in coordination with the City of Redondo Beach. CEQA Guidelines Section 15151 states that “[a]n evaluation of environmental effects of a proposed project need not be exhaustive...”. This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide “...a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations” (CEQA Guidelines Section 15151).

Based on the Sight Line Study prepared by VIZf/x, a licensed architect specializing in the analysis of visual resources impact, the implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) at least 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). With this reduction, the maximum height of the proposed RCFE Building would rise to just below the ridgeline of the Palos Verdes hills from 190th Street and Flagler Lane. However, as described in MM VIS-1, this revision to the final design could include the removal of the uppermost stories of the building and/or recessing the building foundation further into the

ground surface. While the preferred method would be to reduce the floor-to-ceiling heights to accommodate the height, a detailed design and 3D model has not yet been developed. Therefore, a detailed, photorealistic simulation cannot be prepared at this time. However, MM VIS-1 very clearly describes the requirements to reduce the impact to less than significant based on robust technical study independently prepared by a licensed architect (i.e., by avoiding the interruption of the Palos Verdes ridgeline when viewed from Representative View 6).

Comment WB-30

The comment suggests adding Redondo Beach General Plan Land Use Element Policies 1.55.8-1.55-10 to Section 3.3, *Biological Resources*. These policies along with Policy 1.55.7, which establish water conservation strategies through irrigation and landscaping, are applicable to the assessment of water demand or supply in Section 3.15, *Utilities and Service Systems*. Accordingly, these policies have been added to Section 3.15.2, *Regulatory Setting*.

Comment WB-31

The comment claims that the existing buildings onsite have not been formally reviewed by the Redondo Beach Preservation Commission and that it would be more accurate to state in Section 3.4, *Cultural Resources* that the buildings are not identified as potential resources in the City's Historic Resource Survey. The language in Section 3.4.1, *Environmental Setting* has been revised to more accurately describe the review process for these buildings, consistent with this recommendation.

Comment WB-32

The comment claims that the property at 328 N. Gertruda Avenue is one of many properties within the Gertruda Avenue Historic District and that the entire district should be referenced in Table 3.4-1 within Section 3.4, *Cultural Resources*. It should be noted that the City of Redondo Beach Historical Resources Register does not note the property at 328 N. Gertruda Avenue within the Gertruda Avenue Historic District and the Historic District list does not include this property. Rather the City of Redondo Beach's Historical Resources Register lists the property at 328 N. Gertruda Avenue within the Original Townsite Historic District, as noted in Table 3.4-1 of the Draft EIR. Nevertheless, given that the Original Townsite Historic District and Gertruda Avenue Historic District are partially located within 0.5 miles of the Project site, these historic districts have been added to Table 3.4-1. The title of Table 3.4-1 has been revised to clarify that it includes Historic Architectural Resources in Redondo Beach within 0.5 miles of the Project site.

Comment WB-33

The comment suggests clarifying in Table 3.4-1 that the property at 820 Beryl Street is a potentially historic resource within the City of Redondo Beach’s Historic Resource Survey, but is not currently designated as a local landmark. Table 3.4-1 clearly states that the status of the property at 820 Beryl Street is “Locally Significant,” rather than “Local Landmark” as described for the Morrell House and Queen Anne House at Dominguez Park. However, an additional note has been added to Table 3.4-1 to further clarify that the “property located at 820 Beryl Street was determined to be a potentially historic resource within the City of Redondo Beach’s Historic Resource Survey; however, this property has not been designated as a Local Landmark.”

Comment WB-34

The comment states that the cities of Redondo Beach and Torrance shall have oversight and enforcement capabilities to ensure BCHD complies with the recommendations and specifications of the Geotechnical Report prepared for the proposed Project. As described in MM GEO-1, City of Redondo Beach and City of Torrance permit compliance staff shall observe and ensure compliance with the recommendations and specifications of the Geotechnical Report during grading and construction activities associated with the proposed Project. MM GEO-1 has been revised to further clarify that BCHD would be required to comply with the recommendations and specifications of the Geotechnical Report and that the cities would be required to review all final grading plans, design drawings, and construction plans, as appropriate, and observe earthwork and grading to ensure compliance with these recommendations and specifications.

Comment WB-35

The comment claims that there is no enforcement for MM GEO-2b, which requires that, in the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made. Refer to the response to Comment WB-10.

Comment WB-36

The comment states than MM GEO-2a does not provide contingency for employees that may be hired mid-project after initial training has been conducted. However, MM GEO-2a requires that all workers attend awareness training regarding the paleontological resources that may occur onsite. As described in MM GEO-2a, the qualified paleontologist shall develop worker attendance

sheets to record workers' completions of the awareness session. Further, MM GEO-2a requires that BCHD provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested. To further ensure enforcement of the worker awareness training for workers starting after the initial awareness training, MM GEO-2a has been revised to include that the worker awareness session for paleontological resources shall occur, "*prior to the initiation of excavation and grading activities or prior to the start of work onsite for new workers hired after the initial awareness session.*"

Comment WB-37

The comment suggests including Redondo Beach General Plan Transportation and Circulation Element Policy 16 in Section 3.7, *Greenhouse Gas Emissions and Climate Change*. Policy 16 has been added to Section 3.7.1, *Regulatory Setting*.

Comment WB-38

The comment suggests altering the description of Project 12 and adding another similar Caltrans project in Table 3.0-1 in Section 3.0.2, *Cumulative Impacts*. These projects have been revised in Table 3.0-1, as recommended.

Comment WB-39

The comment states that volatile organic compounds (VOCs) should be remediated to the required regulatory standards and measures in place, and ensure that future contamination does not further migrate from the possible source onto the site. As described in Section 3.8, *Hazards and Hazardous Materials*, the implementation of MM HAZ-2a through HAZ-2d would ensure VOC compounds and contaminated soils are properly detected, removed, and handled during ground disturbing activities. For example, MM HAZ-2a would require preparation and implementation of a Soils Management Plan, which would be subject to review by the City of Redondo Beach as well as the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division, Los Angeles Regional Water Quality Control Board (RWQCB), and City of Torrance. MM HAZ-2b and HAZ-2c would require soil vapor monitoring and soil vapor extraction equipment. MM HAZ-2d would require that construction activities cease in the event that previously unknown or unidentified soil and/or groundwater contamination. With implementation of MM HAZ-2a through -2d, the risk of an accidental release of hazardous materials into the environment during construction of the proposed Project would be less than significant with mitigation.

Comment WB-40

The comment suggests that BCHD should properly mitigate and follow regulatory requirements and construction standards for known oil well locations. As described further in Master Response 11 – Hazards and Hazardous Materials pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM’s Well Review Program and compliance with CalGEM’s advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

Comment WB-41

The comment expresses concern that the Redondo Beach Local Hazard Mitigation Plan was not considered in the analysis presented in Section 3.8, *Hazards and Hazardous Materials*. As described in Section 3.8.2, *Regulatory Setting*, the LACoFD Health Hazardous Materials Division and Rbfd work together to implement the Redondo Beach Local Hazard Mitigation Plan that addresses the City’s planned response to emergencies. Section 3.8.2, *Regulatory Setting* has been updated to include further discussion of the Redondo Beach Local Hazard Mitigation Plan.

Comment WB-42

The comment claims that the Project would require a zoning variance given that it would exceed the 0.5 FAR in the C-2 zoned parcel (Flagler Lot) and that the EIR should consider alternative to the Project if findings for a variance cannot be made. Refer to the response to Comment WB-5.

Comment WB-43

The comment suggests including several policies from the Redondo Beach General Plan Noise Element in Section 3.11, *Noise*. Redondo Beach General Plan Noise Element Goal 10.4 and Policies 10.4.1 and 10.4.5; Policies 10.5.1 and 10.5.5; Goal 10.6 and Policies 10.6.1 and 10.6.2; and Goal 10.8 and Policy 10.8.1 have been added to Section 3.11.1, *Regulatory Setting*.

Comment WB-44

The comment requests the EIR include an analysis of operational noise impacts from the proposed electrical yard and gas yard areas. As previously described, the gas yard is an existing feature on the site and would not be affected by the proposed Project. As described in Master Response 12 – Noise Analysis, Section 3.11, *Noise* of the EIR has been revised to include discussion of the potential for operational noise impacts from the proposed substation.

Comment WB-45

The comment requests consideration of the potential for indirect impacts related to population increase associated with Redondo Beach dwelling units being vacated to move into the proposed Assisted Living units, which would free up dwelling units for the average 2.34 persons per household. This comment has been noted. The discussion in Impact PH-1 has been revised to clarify that even with the conservative assumption that all of the proposed 157 new Assisted Living units are occupied by Redondo Beach residents that currently live alone, and that all of their Redondo Beach residences are filled with new residents from outside of the Redondo Beach area at an average rate of 2.34 persons per household, the maximum population increase would be 367, which would still be less than 1 percent (i.e., 0.55 percent) of the Redondo Beach population.

Comment WB-46

The comment implies the EIR does not consider the conflict with access to Flagler Lane for BCHD employees and visitors. However, it should be noted that the driveways along Flagler Lane would not provide access to long-term parking on the BCHD campus and as such, would not be a primary entrance for BCHD employees and visitors. The primary entrances to the Project site would continue to be provided along North Prospect Avenue. Additionally, as noted in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. As such, Section 5.0 considers four Project alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. For further detail on Project Alternatives, see Section 5.0, *Alternatives*.

Comment WB-47

The comment recommends noting that the Construction Traffic and Access Management Plan required under MM T-2 would be subject to review and approval by the City of Torrance rather than the County Department of Transportation (DOT). Given that the proposed construction haul

trucks would travel along regional highways, the Construction Traffic and Access Management Plan is subject to review and approval by County DOT. However, the City of Torrance Community Development Department has been added to the list of reviewers under MM T-2 given that the proposed construction haul routes would also travel through the City of Torrance.

Comment WB-48

The comment suggests that while MM T-2 states, “*Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself,*” it should further state that “*No truck queuing/staging shall occur on any public roadway in the vicinity of the project.*” This comment has been noted. MM T-2 clearly states that truck queuing/staging would be allowed at approved locations only. MM T-2 further states that the required Construction Traffic and Access Management Plan would be subject to review and approval by the City of Redondo Beach Engineering Division, among other agencies. As previously described, BCHD is committed to working collaboratively with the City of Redondo Beach to develop a Construction Traffic and Access Management Plan that is suitable for approval.

Comment WB-49

The comment recommends including Redondo Beach General Plan Utilities Element Policy 6.1.10 to Section 3.15, *Utilities and Service Systems*. Objective 6.1 and Policy 6.1.10 have been added to Section 3.15.2, *Regulatory Setting*.

Comment WB-50

The comment suggests adding Redondo Beach General Plan Land Use Element Policies 1.55.7-1.55.9 to Section 3.15, *Utilities and Service Systems*. As described in response to Comment WB-30, these policies have been added to Section 3.15.2, *Regulatory Setting*.

Comment WB-51

The comment recommends including Redondo Beach General Plan Utilities Element Policies 6.1.5, 6.2.3, and 6.2.7 to Section 3.15, *Utilities and Service Systems*. This comment has been noted. Objective 6.2 and Policies 6.1.5, 6.2.3, and 6.2.7 have been added to Section 3.15.2, *Regulatory Setting*.

Comment WB-52

The comment incorrectly claims that Impacts UT-3 and UT-4 do not address the potential for impacts on the City of Redondo Beach sewage collection system or the Los Angeles County

Sanitation District (LACSD) transmission system. The increase in operational wastewater generation at the Project site and associated effects on the local sewer system and LACSD sewer lines resulting from implementation of the proposed Project are discussed under Impact UT-3. As described under Impact UT-3, the Sewer Capacity Study prepared for the proposed Project determined that the existing buildings on the Project site generate a peak daily demand of 68,925 gallons per day (gpd), which flows into the 8-inch local sewer main in North Prospect Avenue and away from the Project site to the southeast. The existing sewer main capacity is 668,593 gpd. Using wastewater generation factors from the City of Los Angeles CEQA Thresholds Guide (2006), Phase 1 of the proposed Project would decrease existing wastewater generation by approximately 6,319 gpd and Phase 2 of the proposed Project would increase the amount of wastewater currently transported by the sewer system by approximately 47,361 gpd from existing conditions.

To ensure that wastewater flows would be adequately accommodated, sewer lines are reviewed based on the guidelines for sewer design and operations from the Los Angeles Bureau of Engineering Manual – Part F. The Sewer Capacity Study concluded, even with the increase in sewage flow associated with the proposed Project, proposed flows would remain below a 50 percent flow depth to diameter ratio, and the existing 8-inch sewer line along Diamond Street would adequately accommodate the proposed sewer flow without upgrades. Therefore, the proposed Project and would not exceed existing infrastructure capacity.

The EIR further describes in Impact UT-3 that the proposed Project wastewater would continue to flow from the local sewer line along Diamond Street to the LACSD South Bay Cities Main Trunk Sewer, located in Gertruda Avenue at Catalina Avenue. The LACSD's 20-inch diameter lined trunk sewer has a capacity of 2.4 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2015. As such, the LACSD main trunk sewer has a remaining sewer capacity of approximately 2.1 mgd and the increase in sewage flow of 0.047 mgd associated with the proposed Project would not exceed the LACSD sewer capacity. Therefore, implementation of the proposed Project would result in a less than significant impact on existing wastewater infrastructure. Please refer to Impact UT-3 in Section 3.15, *Utilities and Service Systems* for a full discussion of the potential for impacts on the City of Redondo Beach sewage collection system or the LACSD transmission system.

Comment WB-53

The comment criticizes the discussion of the possibility of rezoning for mixed-use or multi-family under Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus since a number of uses could be requested and serve different purposes. Under Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus, BCHD would not demolish, retrofit, or otherwise

redevelop any of the facilities on the existing BCHD campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant Flagler Lot for redevelopment of uses permitted under the P-CF zone district of those that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus discusses a range of potential development scenarios, including uses permitted under the P-CF and C-2 zones, uses that would be permitted with a CUP, and uses that could be permitted with a zoning change. Therefore, the discussion of Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus discusses the possibility of a number of different uses of the site.

Comment WB-54

The comment notes that Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

8.3.2 Non-Governmental Organizations

Letter MC

June 8, 2021
Marcia Cook, Chair
Sierra Club Palos Verdes / South Bay Group

Comment MC-1

The comment questions why photovoltaic solar panels are proposed for only 25 to 50 percent of the rooftop area. Installation of photovoltaic solar panels across 25 to 50 percent of the proposed Project’s rooftop area would result in substantial solar capacity of the Beach Cities Health District (BCHD) campus. Although these comments do not address the adequacy of the EIR, as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment MC-2

The comment describes that the proposed Project would result in approximately 5 years of construction during which construction activities would have the potential to affect nearby

sensitive receptors. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion of how the EIR considers and addresses potential air quality impacts to sensitive receptors.

The comment goes on to inquire how the use of Tier 4 engines will be enforced during construction. As described in Mitigation Measure (MM) AQ-1, BCHD would be required to prepare and Air Quality Management Plan for Project construction, which require the use of U.S. Environmental Protection Agency (USEPA) Tier 4 engines, among other fugitive dust control and air quality management measures. CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

Comment MC-3

The comment inquires who will enforce the California Idling Regulations onsite during construction. As described in Section 3.2.2, Regulatory Setting, the California Air Resources Board (CARB) has also established California Idling Regulations that restrict the idling of heavy-duty vehicles. In particular, the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling requires, among other things, that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle’s primary diesel engine longer than 5 minutes at any location. These regulations are codified in Title 13 California Code of Regulations (CCR) Section 2485, and may be enforced by the Air Resources Board; peace officers as defined in California Penal Code, Title 3, Chapter 4.5, Sections 830 et seq. and their

respective law enforcement agencies' authorized representatives; and air pollution control or air quality management districts. Any person who violates any requirement of this section is subject to the penalties set forth in California Health and Safety Code Sections 39674, 39675, 42400, 42400.1, 42400.2, 42400.3, 42402, 42402.1, 42402.2, 42402.3, 42402.4, 42403.5, and 42410 and 43704.

Comment MC-4

The comment claims that wind can increase without warning and contractors are typically not willing to stop work quickly, implying that there is a lack of enforcement for MM AQ-1, which would prohibit demolition when wind speed is greater than 25 miles per hour (mph). Refer to the individual responses to Comments MC-2 and MC-3 for a description of implementation and enforcement responsibilities, which are also outlined Section 11.0, *Mitigation, Monitoring, and Reporting Program*.

The comment goes on to state that the dust control measures would require a lot of water and that the EIR should provide methods to reduce water use while still mitigating dust and particulate matter migration. However, it should be noted that MM AQ-1 already provides several measures for dust control that do not require the use of water, such as quick replacement of ground cover in disturbed areas, covering all stock piles with tarp, limiting traffic to 15 mph or less on unpaved roads, prohibiting demolition when wind speed is greater than 25 mph, and sweeping streets adjacent to the Project site at the end of the day if visible soil material is carried over to adjacent roads.

Comment MC-6

The comment contends that the known contamination on-site could result in health impacts that have not been addressed. While the comment correctly states that construction activities associated with the proposed Project would disturb soils contaminated with tetrachloroethylene (PCE), the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, Hazards and Hazardous Materials). The implementation of MM HAZ-2a through HAZ-2d would ensure that PCE and the other identified volatile organic compounds (VOCs) are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through HAZ-2d impacts would be less than significant.

Comment MC-7

The comment states that the use of soil vapor extraction (SVE) equipment, particularly the blowers prescribed in MM HAZ-2c, should be equipped with activated charcoal filters or other treatment to avoid blowing unhealthy concentrations of VOCs into the air and expose people downwind to these vapors. As described in MM HAZ-2b and HAZ-2c, the use of SVE equipment would be used only in the event that the OSHA exposure limits for PCE and other VOCs are exceeded and would only be used for work within confined space. Given that this equipment would be used in confined spaces, use of this equipment would not result in substantial downwind vapors of VOCs. However, carbon filters are described as a part of the proposed foundation design for the proposed development on the BCHD campus.

Comment MC-8

The comment states that MM HAZ-2c refers to PCE as trichloroethylene instead of tetrachloroethylene. MM HAZ-2c has been revised to abbreviate PCE for tetrachloroethylene.

Comment MC-9

The comment questions the EIR's findings regarding impacts on loss of mature trees and associated impacts on greenhouse gas (GHG) emissions and migratory birds, asserting that these impacts should be considered significant. However, as thoroughly discussed in Section 3.3, *Biological Resources*, while the Project would result in the removal of approximately 20 landscaped trees along Flagler Lane, approximately 60 trees along the northern perimeter of the campus, and approximately 20 landscaped trees along Diamond Street. The Phase 2 development program would also require the removal of additional landscaped trees and shrubs within the interior portions of the existing BCHD campus. Despite the removal of these trees, the proposed Project's landscaping plan would replace trees and shrubs with new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal Code (RBMC) Section 10-2.1900, and proposed tree removal and landscaping along Flagler Lane would be conducted consistent with the Torrance Street Tree Master Plan. The proposed landscaping – including large landscaped trees and shade trees that are adapted to the climate of Southern California – would provide enhanced roosting or nesting habitat for resident and migratory birds. In addition, the implementation of MM BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey

would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged (i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation. Additionally, as described in Table 3.7-7 in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, the proposed Project would result in a reduction of 741.7 metric tons of carbon dioxide equivalent (MT CO_{2e}) per year. As such, contrary to the commenter's assertion, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

Comment MC-10

The comment describes that the use of local native plant species rather than drought-tolerant plants from other parts of the world would increase habitat value for wildlife. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees consistent with the existing landscaping on-site and in the vicinity (refer to Figure 2-9). As described in the response to Comment MC-9, the plantings would be consistent with RBMC Section 10-2.1900 as well as the Torrance Street Tree Master Plan, where applicable within the City of Torrance right-of-way.

Comment MC-11

The comment recommends minimizing the use of natural gas by using heat pump heating, ventilation, and air conditioning (HVAC) and heat pump water heating to back up solar water heating. The overall estimated net increase in natural gas demand following the completion of Phase 2 of the proposed Project would be 2,546,779 thousand British thermal units (kBtu) (25,475 therms) per year, which corresponds with approximately 0.2 percent of natural gas consumption in Redondo Beach in 2012. As described in Section 3.5, *Energy*, the estimated energy demand is conservative in that it does not account for the sustainability features described for the proposed Project including photovoltaic solar panels, solar hot water systems, high efficiency HVAC systems, etc. (refer to Section 2.5.1.5, *Sustainability Features*).

Comment MC-12

The comment claims that the proposed Project would result in significant GHG emissions given the projected transportation fuel consumption provided in Table 3.5-6. As shown in Table 3.5-6, the total fuel consumption associated with construction equipment and construction vehicle trips would represent a very small fraction – less than 1 percent – of the County's total 2018 fuel

consumption and would not result in a substantial increase in fuel consumption. The total fuel consumption associated with the proposed Project would be comparable with similarly sized construction projects in the South Bay. As described in Table 3.7-7 in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, the proposed Project would result in a reduction of 741.7 MT CO₂e per year. As such, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

Comment MC-13

The comment suggests that the proposed Project include measures to ensure California and Redondo Beach will meet the 1990 GHG emissions levels target by 2020. The proposed Project includes several measures and design features to reduce energy demand, water demand, and vehicle miles traveled (VMT), all of which would reduce GHG emissions. As described in Section 2.5.1.5, *Sustainability Features*, it should be noted that all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed Residential Care for the Elderly (RCFE) Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

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

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

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

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

It should be noted that the EIR identifies less than significant impacts associated with GHG emissions. The proposed Project complies with Connect SoCal, the Redondo Beach and Torrance General Plans and Climate Action Plans, the RBMC, the Torrance Municipal Code (TMC), Assembly Bill (AB) 32, and SB 32, and thus would ensure that the GHG emissions associated with the proposed Project would conform with State and local requirements (refer to Tables 3.7-8 through 3.7-10). As previously described, the proposed Project would result in a reduction of 741.7 MT CO_{2e} per year. As such, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

Comment MC-14

The comment states that the EIR does not provide an easily findable link for the public to read the Phase I and Phase II Environmental Site Assessment reports. These reports are provided in

Appendix G of the EIR. Additionally, they are also available on the BCHD website here: <https://www.bchdcampus.org/campus>.

Comment MC-15

The comment states that the EIR is required to analyze a “*Do Nothing*” alternative, which would mean leaving all of the existing buildings and grounds in place as they are. For context, pursuant to CEQA Guidelines Section 15126.6(e)(1), “[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Pursuant to CEQA Guidelines Section 15126.6(e)(2), “[t]he ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing BCHD campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.)

If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is “*reasonably expected to occur in the foreseeable future*” clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

Comment MC-16

The comment states that the best course of action would be to remodel the existing buildings on the BCHD campus rather than redevelop the BCHD campus. However, as discussed in detail within Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, upgrade of the Beach Cities Health Center would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. The financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. Therefore, this alternative would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD, and was discarded from further consideration. This discussion provides sufficient information and explanation as to why this alternative would not generate enough financial resources necessary to meet the basic objectives of the Project. The CEQA Guidelines Section 15126.6(c) states that:

“The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

Further, State CEQA Guidelines Section 15126.6(d) states that:

“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project... If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

The discussion of the Upgrade the Beach Cities Health Center (No Seismic Retrofit) alternative provides sufficient information regarding the factors considered in the analysis of this alternative, primarily failure of the alternative to meet most of the basic project objectives and financial infeasibility, and the determination to dismiss the alternative from further analysis.

The comment further asserts that a complete analysis should be performed for both a “Remodel” and “Remodel to Include Retrofit” alternative, and states that the No Project Alternative analysis needs to be revised so that it is not a demolition, but instead a remodel of the existing buildings. However, as previously described in the response to Comment MC-15, the EIR sufficiently describes the reasonably foreseeable actions that would be implemented under a No Project Alternative, and need not include additional or revised discussion of an alternative that considers solely the remodel of existing buildings. Consideration and discussion of project alternatives in an EIR is governed by CEQA Guidelines Section 15126.6, which states “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”

8.3.3 Neighborhood Organizations

Letter TRAO

June 1, 2021
Torrance Redondo Against Overdevelopment

Comment TRAO-1

The commenter provides a roadmap summarizing the intent of the comments, appendices, attachments, and references. The commenter also provides a general summary of conclusions, which are responded to in the responses to comments below. However, it must be noted that the assertions contained in this summary roadmap comment are often unsupported opinion statements

with no substantial evidence provided in the record to support such assertions. Such unsupported assertions absent facts and detailed analysis do not constitute substantial information in the record as defined in California Environmental Quality Act (CEQA) Guidelines Section 15384. For example, as described in the responses to individual comments below, the proposed Healthy Living Campus Master Plan is legal and the role of the Beach Cities Health District (BCHD) as lead agency fully complies with the requirements of CEQA. Similarly, the assertion that the project objectives are misleading and serve only BCHD's wants rather than the public needs is unsupported opinion and ignores the nearly 70-year long history of BCHD serving public health needs in the Beach Cities and the nearby South Bay communities. BCHD carefully considered the development of the project objectives in light of its mission to provide community-based health and wellness services and formulated these project objectives after extensive internal discussions, open sessions of the BCHD Board of Directors, and discussions during five different public scoping meetings. In addition, stated opinions many of the mitigation measures do not sufficiently protect the public are also unsupported by technical analysis and ignore the fact that these measures were crafted by technical experts with substantial expertise in their relevant fields overseen by a CEQA Project Management Team with decades of experience producing more than 60 Environmental Impact Reports (EIRs) for jurisdictions throughout Southern California and Central California. Finally, without providing substantial evidence or analysis, the comment asserts that applicable plans, alternatives, and cumulative effects are not evaluated at sufficient depth and that many environmental issue areas in CEQA Appendix G have not been adequately addressed. However, as set forth in the responses to the individual comments below, the EIR exhaustively addresses each of these environmental issue area, providing detailed analysis supported by technical studies, where appropriate.

Comment TRAO-2

The comment describes the Torrance Redondo Against Overdevelopment (TRAO) organization as well as some of its recent activities as they relate to the proposed Healthy Living Campus Master Plan. The Beach Cities Health District (BCHD) acknowledges this summary.

Comment TRAO-3

The comment incorrectly asserts that the City of Redondo Beach is the only entity that is viable as a lead agency. As described in Master Response 2 – BCHD as Lead Agency, CEQA Guidelines Sections 15050-15053 govern how the lead agency is determined. Pursuant to CEQA Guidelines Section 15051:

“Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:

(a) If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency.”

Although the Project site is located in the City of Redondo Beach, the proposed Healthy Living Campus Master Plan would be approved and implemented, hence, carried out, by BCHD. For example, BCHD would enter into agreements to demolish the existing buildings, construct the new buildings and associated improvements, and operate the new health and fitness facilities. The only other agencies that would grant discretionary approvals for the proposed Project are the City of Redondo Beach (Design Review and Conditional Use Permit [CUP]), and possibly the City of Torrance (related to limited activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way). State licenses would also be needed to operate some of the facilities. The CEQA Guidelines anticipate that this will often be the case, however, which is why the role of the responsible agency, which applies to these agencies, was created and is defined in CEQA Guidelines (CEQA Guidelines Section 15096 and 15381). Therefore, assertions that the Project is somehow illegal and that BCHD is not the lead agency are without legal basis and are unsupported by the basic facts surrounding the proposed Project.

Comment TRAO-4

The comment asserts that the proposed Healthy Living Campus Master Plan violates the City of Redondo Beach Municipal Code (RBMC) and the City of Torrance Municipal Code (TMC).

The comment claims that the EIR ignores the Torrance Hillside Overlay Zone. However, as described in Section 2.0, *Project Description*, the EIR discloses and acknowledges that “[t]he Torrance Property Zoning Map also identifies these Flagler Lane and Flagler Alley within the Hillside Overlay, which generally extends along the western border of Torrance.” Additionally, the Hillside Overlay Zone is depicted in Figure 3.10-2. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way, which are relatively minor components of the proposed Project, would require permits issued by the City of Torrance. However, the City of Torrance’s jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the BCHD campus beyond the municipal boundaries. The potential for significant environmental effects resulting from conflict

of the proposed Project with the Torrance General Plan are thoroughly addressed in Section 3.10-5. Final determination of consistency with individual policies will be the responsibility of the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. Nevertheless, as required under CEQA, the EIR discloses and discusses potential consistency with such policies for consideration by City decision-makers and staff.

The comment also asserts that the proposed Healthy Living Campus Master Plan would result in illegal access to streets within the City of Torrance. The proposed Project includes two access points with driveways along Flagler Lane. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed for a subterranean service area and loading dock entry/exit. Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, which is designated as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether. The EIR serves as an informational document that provides both lead and responsible agencies with detailed impact analysis and assessment of consistency with adopted plans and policies for consideration during permitting.

Finally, the comment incorrectly asserts that the City of Redondo Beach Measure DD would require a public vote on the proposed Health Living Campus. Measure DD, which was approved in 2008, requires a public votes for any zoning changes. The proposed Project would not require a zoning change. As described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, the existing BCHD campus is designated as P (Public or Institutional) by the Redondo Beach General Plan and zoned as P-CF (Community Facility) under the Redondo Beach Zoning Ordinance. The P designation applies to lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. Specific purposes of the P designation provides lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost community health and wellness services and programs to Beach Cities residents as well as other nearby South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project

would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Further, under RBMC Section 10-2.1110, medical offices, health-related facilities, and residential care facilities are permitted on P-CF zones with a CUP. A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Memory Care. The proposed Project – like other improvements made on the BCHD campus in the past – would require a CUP under existing code, with the City of Redondo Beach acting as a responsible agency after consideration of the proposed Project by the BCHD Board of Directors. As described in RBMC Section 10-2.1116 the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project would not conflict with any P-CF zoning code requirements.

Comment TRAO-5

The comment claims that BCHD has taken a number of actions and incorrectly asserts that this is evidence of approval of the proposed Health Living Campus Master Plan and that the EIR should be withdrawn. However, BCHD has not taken any action(s) to approve the proposed Project. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to prepare the description of a proposed Project for analysis in the EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus in order to develop the project description to a sufficient level of detail for impact analysis (e.g., trip generation calculations). It should also be noted that where required these actions have been conducted in open manner by the BCHD Board of Directors, at multiple well-noticed public hearings.

Comment TRAO-6

The comment asserts that the project objectives related to seismic safety are misleading and asserts that these objectives are self-serving and prey upon the public's fear of earthquakes. However, this assertion is unsupported by facts and the public record. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building

tenants in addition to the escalating maintenance costs, which detract from health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

Comment TRAO-7

The comment asserts that the cost of retrofitting the existing Beach Cities Health Center is not as expensive as claimed. As described in Master Response 6 – Financial Feasibility/Assurances, while CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to do so if the information “...*does not supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

For clarity, it should be noted that the elimination of seismic hazards is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD’s mission. Revenues from the long-term tenant leases support BCHD community health and wellness services to both Beach City residents and many residents throughout the South Bay. However, BCHD’s ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. The combined cost of renovation and seismic retrofit would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD’s mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. This issue is also discussed in Section 5.0, *Alternatives* as a part of the rationale for the development of Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) as well as Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus.

Comment TRAO-8

The comment asserts that BCHD discriminates between occupants of the Beach Cities Health Center and the two other medical office buildings. Further, it claims that this is to improve the creature comforts for the BCHD staff who work in it. This comment is wholly unsupported by factual evidence and further does not address the adequacy of the EIR or any physical environmental issues as required by CEQA.

Nevertheless, as described in Master Response 3 – Project Need and Benefit, Nabih Youssef Associates conducted a seismic assessment that found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue) and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). This *Beach Cities Health District Seismic Assessment* is referenced in the EIR and is publicly available at: https://www.bchdcampus.org/sites/default/files/archive-files/January-2018-Nabih-Youssef-and-Associates-Presentation_CWG.pdf. As described in the seismic assessment and as summarized in Section 3.6, *Geology and Soils*, “[t]he Beach Cities Health Center, formerly the South Bay Hospital, is a 60-year-old, non-ductile concrete building. The original 4-story (north) tower was constructed in 1958 and the 4-story addition (south tower) was constructed in 1967. Both of these towers were constructed with non-ductile concrete roofs, floors, and poorly reinforced columns, making them susceptible to collapse in the event of an earthquake.”

Construction has been phased as proposed because the more substantial geotechnical issues were identified in the 4-story Beach Cities Health Center, which is nearly a decade older and more susceptible to future structural stability issues in the event of an earthquake than the Beach Cities Advanced Imaging Building. In addition, the Beach Cities Health Center includes Memory Care units that are occupied 24 hours per day which means that the occupants of that building are more susceptible to risk because they living in the building. The assertion that the proposed Project phasing is strictly intended to improve the creature comforts for the BCHD staff who work in it is unfounded and unsupported by substantial evidence.

Comment TRAO-9

This comment, without providing substantial evidence, restates the assertion that the proposed Project is an indefinite, uncertain, and speculative way to solve a seismic problem and states the need for a seismic retrofit is a BCHD management want. Refer to the response to Comment TRAO-7. It is important to note that CEQA Guidelines Section 15124 requires that “...the statement of objectives should include the underlying purpose of the project and may discuss project benefits.”

There is substantial evidence that the project objective addresses the underlying purpose of the project. The commenter's disagreement with the project objectives is a comment on the project, not on the adequacy of the environmental analysis in the EIR. Also, as previously described, the project objective to eliminate seismic safety issues is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, *Project Description*, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. In addition, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies.

Comment TRAO-10

The comment implies that the underlying objective of the proposed Project is for BCHD to generate revenue to stay in business. The comment also offers claims that previously presented polling data have been biased and that the need for the community health and wellness services provided by BCHD is overstated. However, these comments are unsubstantiated opinion that does not reflect the public record of BCHD's work on the proposed Project nor the evidence presented in multiple technical studies and discussed in several open public hearings before the BCHD Board of Directors.

Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD community health and wellness services for both residents of the Beach Cities living and many interested residents from the South Bay. As such, the proposed development must replace revenue to support the current level of existing community health and wellness programs and services as well as generate new revenues to fund the growing future community needs. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. CEQA does not require a

quantification of the value that BCHD provides to the community within the EIR, although such value is apparent in the range of programs and services provided and the existing public use of these program services by tens of thousands of residents. A quantitative analysis of BCHD's services can be found in the Community Health Report (<https://www.bchd.org/healthreport>) as well as the Priority-Based Annual Budgets (<https://www.bchd.org/operating-budgets>).

Comment TRAO-11

This comment asserts that BCHD overstates the collaboration and the incorporation of input gathered as a part of the Community Working Group (CWG) formed by BCHD. This comment does not relate to the adequacy of the environmental review in the EIR. As stated in CEQA Guidelines Section 15204, “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” However, BCHD has gone to relatively extraordinary lengths to gather community input and address concerns, holding numerous public workshops and hearings over the last 5 or more years to discuss the Project. The formation of the CWG is discussed in Section 1.6, *Project Background*, which describes the history associated with the proposed Project and provides a brief summary of the competing community concerns that were considered during the development of the proposed Healthy Living Campus Master Plan. Section 1.6, *Project Background* and Table 1-1 accurately summarize the 17 CWG meetings that were held to discuss various components of the proposed Healthy Living Campus Master Plan during its tenure. The CWG was dissolved in December 2020 following the conclusion of the preliminary planning and design phases. BCHD staff also conducted public outreach for the Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan, as well as holding five scoping meetings, an unusually high number. The analysis of physical environmental impacts provided in the EIR does not rely on any of the polling questions or data identified in the comment.

Comment TRAO-12

This comment restates that supporting the current level of services is a BCHD want and not a public need. Refer to the response to Comment TRAO-10 as well as Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue.

Comment TRAO-13

The comment asserts that BCHD has overstated the need for an Assisted Living program in the Beach Cities, but represents an unsupported assertion, not based on expert opinion or corroborating technical studies. As described in Master Response 6 – Financial Feasibility/Assurance, BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. Field work and analysis were originally completed in April 2016 and updated in August 2018 and May 2019 to reflect the changed number of proposed housing units. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 updated market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. The assertion that there is not a demand for Assisted Living in the Beach Cities is unfounded and clearly refuted by these technical studies prepared by firms with recognized expertise.

The comment also suggests that BCHD consider the implementation of a village movement philosophy, where neighborhood organization are formed and homeowners pay yearly dues to hire a small staff for in-home help. It should be noted that the proposed Project would provide a Program of All-Inclusive Care for the Elderly (PACE). As described in Section 2.5.1.1, *Proposed Uses*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services older adults (i.e., age 55 and older with an average age of 76), which permits and assists seniors remaining in their own homes. PACE services would be focused on services provided at an adult day health center, but would also include home health care visits and delivery services. Such services would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.), thereby coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. For most participants, PACE services would enable them to remain in their homes in the community rather than receive care in a nursing home or other elder care facility.

Comment TRAO-14

The comment suggests that the demolition of the Beach Cities Health Center is not required to create open space and further asserts that the open space would not be publicly accessible because it would be both *privately owned by an investment company* and would be *popular with the homeless*. However, the proposed open spaces and major walkways would be open to public access, with security features to enable access while controlling use. While the northern surface parking lot is currently paved and could conceivably be converted into a smaller open space, it is located on an elevated area of the BCHD campus behind the Redondo Village Shopping Center. If converted into open space, this area would be relatively hidden from the existing public realm (e.g., sidewalks in the vicinity) and neither be readily accessible by the public nor well integrated as a part of a larger BCHD campus environment. As described in Section 2.5.1.1, *Proposed Uses* the proposed Project would substantially expand open space on the existing BCHD campus, including 114,830 square feet (sf) of programmable open space within the interior of the Project site. The central lawn would be sized to accommodate a variety of outdoor community events such as movie nights or group fitness activities. The open space would not be privately owned or cordoned off for security purposes as the comment asserts. As described in Section 2.0, *Project Description*, security features would be limited to access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas. The design of the proposed development would also minimize dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of RBMC Section 10-5.1706(c)(10).

Comment TRAO-15

The comment claims that the Phase 2 development program is unstable. It is not entirely clear what the commenter means by this comment; however, as described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, the Phase 2 development program is fully described in the EIR at a programmatic level. Section 2.5.2, *Phase 2 Development Program*, describes that the long range development program under Phase 2 would include the development of space for a Wellness Pavilion, an Aquatics Center, and a new Center for Health and Fitness (CHF), which would be relocated back on the BCHD campus. Additionally, the Phase 2 development program would include the construction of a parking structure with up to 2 subterranean levels and up to 8.5 above ground levels. The final locations within the Phase 2 footprint and the final sizes of the facilities necessary to support the programmed uses have not yet been finalized; however, the maximum sizes and location of Phase 2 have been described. Due

to uncertainties in future health and wellness programming, trade-offs associated with site planning and design, and financing considerations, Phase 2 can only be programmatically described at this time. It is anticipated that final selection of a detailed site development plan for Phase 2 would be based on the considerations discussed in Section 2.5.2.2, *Physical Design Considerations and Priority-based Budgeting*, but would not occur until after the completion of Phase 1.

This is clearly in keeping with the requirements of CEQA Guidelines Section 15165:

“Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect.”

As described in further Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Comment TRAO-16

The comment states that parklands should be developed in lieu of an aquatics center, parking towers, a new CHF, and a wellness pavilion. It is important to note that the proposed open space would be developed in Phase 1. The development of the proposed Aquatics Center, CHF, and Wellness Pavilion would not encroach on or otherwise limit the use of this open space. Further, it

should be noted that this comment represents the commenter's opinion regarding design of the proposed Project and does not pertain to the adequacy of the EIR.

Comment TRAO-17

The comment claims that the impacts to scenic views are a distraction and incorrectly asserts that Mitigation Measure (MM) VIS-1 is the entire justification that all aesthetic impacts would be less than significant. The comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2. The impact to scenic views, which is the subject of the comment, would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane. MM VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Comment TRAO-18

This comment asserts that the street view of the proposed RCFE Building from Beryl Street is massive and does not belong in a residential neighborhood. While the comment provides a rendering of the proposed Project, which appears to be a marked up version of Representative View 4, the comment does not challenge any specific aspects of the analysis of scenic vistas presented under Impact VIS-1 or visual character presented under Impact VIS-2, but rather states the commenter's opinion. Aside from the subjective contention that the proposed RCFE Building would be out of place, the comment does not contest the consistency of the proposed Project with the City of Redondo Beach policies and development standards, which, consistent with CEQA requirements, are the thresholds for the analysis of impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*). Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Comment TRAO-19

The comment presents the before and after photosimulations of the proposed Project from Representative View 2 and Representative View 3, both of which were presented in the EIR. The comment asserts that these photosimulations illustrate how profoundly the surrounding neighborhoods are impacted by the proposed design and claim that the proposed Project is not compatible with the surrounding neighborhood. The EIR thoroughly describes and depicts the proposed Project using computer-generated photosimulations prepared by licensed architects with the analysis describing potential visual changes in depth, as well as providing detailed mitigation measures, where required.

The comment cites Redondo Beach General Plan Land Use Element Policy 1.46.4: *“Establish standards for the City and coordinate with other public agencies to ensure that public buildings and sites are designed to be compatible in scale, mass, character, and architecture with the existing buildings and pertinent design characteristics prescribed by this Plan for the district or neighborhood in which they are located.”* However, aside from the subjective contention that the proposed RCFE Building is not compatible, the comment does not challenge any specific aspect of the analysis provided within Table 3.1-2, which contains a comprehensive analysis of policy consistency, including the consistency of the proposed Project with Policy 1.46.4. The proposed Project also would be subject to Planning Commission Design Review consistent with the requirements for development in a parcel zoned P-CF. While the proposed Project would increase the maximum total height of new development compared to existing buildings on the Project site, the proposed development under Phase 1 and Phase 2 would be designed using siting, planning, and architectural design to reduce visual bulk and create compatibility with surrounding low-rise development in the vicinity.

With respect to Torrance General Plan Land Use Element Policy LU.2.1, LU.2.2, and LU.3.1, each of these policies is addressed in detail in Table 3.1-3. As described therein, development within the City of Torrance right-of-way would be ancillary to the proposed Project and limited to the proposed pick-up/drop-off loading zone exit as well as the entry/exit for the subterranean service area and loading dock. The subterranean service entrance would require the construction of retaining walls, similar in height to existing retain walls, but which would include substantial new landscaping. These features would require a grading and building permit from the City of Torrance. Additionally, the proposed Project would re-landscape the eastern portion of the BCHD campus to be consistent with the proposed landscape within the remainder of the campus, substantially increasing the coverage of landscaping in this area, including shade trees that would help buffer the proposed Project from surrounding areas. This proposed construction of retaining

walls, a paved driveway, and landscaping would not be incompatible with the Torrance neighborhood to the east, particularly given that the existing slope is already characterized by a series of wooden retaining walls that are maintaining the slope, with numerous mature trees but minimal understory landscaping. The landscaping would serve to help screen and soften the view of the proposed RCFE Building. It should also be noted that the RCFE Building has been sited along the northern perimeter of the Project site in an effort to minimize the potential visual effects on the single-family neighborhood to the east within the City of Torrance. Again, the comment merely cites these policies, but does not challenge any specific aspect of this analysis provided within Table 3.1-3 or provide any substantial evidence in the record or detailed analysis regarding this issue.

Comment TRAO-20

The comment claims, without any substantial evidence, that that the representative views that were assessed in the Draft EIR were selected because they were the more innocuous ones of surrounding locations and that the additional analysis of views from:

- The Tomlee cul-de-sac from homes located directly East and just 80 feet from the site
- The Towers Elementary School playground entrance.

However, the CEQA Project Management Team expended considerable effort to select appropriate representative view locations that provided the most open views from public locations surrounding the Project site. As described in Section 3.2, *Aesthetics and Visual Resources*, six views were used to provide representative locations from which the Project site would be most visible from public streets, sidewalks, and recreational resources within the vicinity of the Project site. These six representative views, which were identified with input from the City of Redondo Beach, encircle the BCHD campus and provide west, southwest, south, and northeast facing views of the Project site (refer to Figure 3.1-1). Representative Views 2, 3, and 5 in particular provide views of the Project site from a distance of less than 100 feet that are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter's assertion that these views used in the analysis of visual impacts are innocuous locations or that the height of proposed development is underrepresented.

With regard to the requested analysis of additional views, the EIR already includes comprehensive analysis of this issue and provides detailed computer-generated photosimulations from the locations from which the proposed Project would be most visible. It should also be noted that CEQA Guidelines Section 15204 clearly states: "*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by*

commentors.” As previously described, the six representative views offer a range of public views from public streets, sidewalks, and recreational resources within the vicinity of the Project site. For example, Representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represent views of the Project site from the residential neighborhood adjacent to the east of the Project site within the City of Torrance. Representative View 2 provides an unobstructed view of the BCHD visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street. An additional representative view of the Tomlee cul-de-sac would not show any additional impact that would be materially different from the impacts described from Representative View 1 or Representative View 2. The same is true for the suggested view from the Towers Elementary School playground entrance.

Lastly, it should be noted that CEQA case law has established that only public views, not private views, need be analyzed under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal. App. 4th 720, the court determined that “...we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal. App. 3d 188, “[all] government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general.” Similarly, in *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal. App. 4th 477, the court upheld an EIR’s determination that impacts on public views would be significant, but impacts on private views were not significant. Additionally, in 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views – including the views from homes as requested by the comment – are not considered under CEQA (California Public Resources Code Section 21082.2).

Comment TRAO-21

The comment incorrectly claims that not a single rendering or visualization of Phase 2 aesthetic impacts are shown and incorrectly states that the analysis of the Phase 2 development program is limited to an assessment of shade and shadow analysis.

Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program. As described therein, a program EIR generally analyzes a project for which less specific detail is currently known, but would be developed at a later date.

The visual impact analysis relies on the best available information for the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the proposed Phase 1 site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which are used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Comment TRAO-22

The comment claims, without providing substantial evidence or analysis, that statements in the EIR are incorrect and unverified and cites a description of the views from Sunnyglen Park being blocked by intervening structures. The comment provides a photograph from Sunnyglen Park that appears to show the existing development on the BCHD campus above an existing 2-story residence. While the photograph does not include an accompanying location map or otherwise identify the location, during the preparation of these responses to comments efforts were made to identify the location from which the photograph was taken, which appears to be at or near the intersection of Norton Street & Redbeam Avenue. Contrary to the comment, based on a review of street level photography, the view in this location does in fact appear to be blocked by existing 1- to 2-story residential structures and associated landscaping. Nevertheless, the description in the Final EIR has been revised to state that “*...views of the existing BCHD campus from Sunnyglen*

Park are partially or completely blocked in some locations (e.g., at the northwest corner of the park) by intervening 1- to 2-story single family residences and neighborhood serving commercial development.” However, the inclusion of multiple views from similar public places adequately depicts changes in public views, where the proposed development interrupts open sky views above existing structures.

As stated in CEQA Guidelines 15003(i), “*CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. A court does not pass upon the correctness of an EIR’s environmental conclusions, but only determines if the EIR is sufficient as an informational document. (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692).*” Given the selection of the adjacent Dominguez Park as a representative view location for the development of photosimulations, the EIR clearly meets the standard for a good-faith disclosure of potential impacts to views from public places.

Comment TRAO-23

The commenter restates the claim that the aesthetics analysis is deficient and must be revised provide additional before-and-after visualizations and include the Phase 2 development program. The comment again asserts the commenter’s opinion that the proposed Project is out of place in a residential neighborhood. As noted in this response, the EIR analysis of aesthetic and visual resource impacts is extensive and based on renderings developed by Paul Murdoch Architects under direction of the experienced CEQA Project Management Team, while the comments express the commenter’s opinion unsupported by detailed analysis of technical studies. For issues related to the location and number of representative views refer to the response to Comment TRAO-20. For issues regarding visual character and neighborhood compatibility refer to the response to Comment TRAO-19. Refer also to Master Comment Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and neighborhood compatibility. For issues related to the programmatic analysis of Phase 2, refer to the response to Comment TRAO-21 as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis.

Comment TRAO-24

The comment incorrectly claims that the air quality analysis uses average emissions rather than peak emissions. Section 3.2.3.2, *Methodology* very clearly states that the South Coast Air Quality Management District’s (SCAQMD’s) California Emissions Estimator Model (CalEEMod) calculates the peak day construction emissions by calculating emissions from overlapping construction activities. Peak daily construction emissions represent the potential worst-case

maximum daily emissions of a construction day, and do not represent the emissions that would typically occur during every day of construction associated with the proposed Project. The estimated maximum daily construction emissions are then compared to SCAQMD's mass daily significance thresholds to identify any exceedances of thresholds, which could result in a potentially significant impact.

As described under Impact AQ-2 in Section 3.2, *Air Quality*, peak daily criteria pollutant emission were calculated for each phase of construction. This exhaustive modeling effort determined that unmitigated localized construction emissions from the proposed Project would exceed SCAQMD's localized significance thresholds (LSTs) for suspended particulate matter (PM₁₀) and fine particulate (PM_{2.5}). However, the EIR also found that implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 miles per hour (mph) which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for PM₁₀ and PM_{2.5} below the SCAQMD's LSTs. All analysis and assessment of mitigation effectiveness was conducted in accordance with SCAQMD's guidance and standards for such analyses. A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment TRAO-25

The comment makes unreferenced and unsubstantiated inferences about the acceptance of construction impacts by society. The comment goes on to claim that BCHD must obey the Hippocratic oath when assessing environmental impacts pursuant to CEQA. These comments are unfounded and do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. As noted in multiple responses above, BCHD has directed that the EIR comport with all CEQA requirements and has engaged in extensive public outreach beyond CEQA minimum requirements to ensure that all public comments are received and responded to, as appropriate.

It should be noted that all construction-related activities associated with the Phase 1 preliminary site development plan and the Phase 2 development program would comply with existing State and local regulations governing construction activities, including the RBMC and TMC. Additionally, the requirements of MM AQ-1, which go beyond the requirements of State and local regulations, would be implemented during construction to reduce impacts associated with PM₁₀ and PM_{2.5} to a less than significant level. The MMRP in Section 11.0, *Mitigation Monitoring and*

Reporting Program would be used to monitor and report on implementation of all adopted mitigation measures, and all implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment TRAO-26

The comment makes unsubstantiated claims regarding the benefits of the proposed Project, the quality of life associated with the proposed Assisted Living program, and the affordability and potential occupancy rates of the Assisted Living units and Memory Care units. None of these comments address the technical adequacy of the air quality analysis in the EIR, which is based on exhaustive quantitative modeling to assess potential impacts associated with criteria air pollutant emissions and toxic air contaminants (TACs). In addition, refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the proposed benefits of the Project. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

Comment TRAO-27

This comment raises issues about PM_{1.0} emissions and the potential effects on public health of local residents. The comment asserts that the EIR fails to adequately address these issues. However, as discussed below, the EIR provides an in-depth analysis of the possible health effects of fine particulates.

The comment cites a California Office of Environmental Health Hazard Assessment (OEHHA) study regarding long-term exposure to ultra fine particulate matter. First, it is important to note that this OEHHA study reviewed the effects of PM_{1.0}. Specifically, this study considered long-term exposure (i.e., for a period of 7 continuous years) to operational sources of gas- and diesel-fueled vehicles, meat cooking, and high-sulfur fuel combustion. The term construction does not appear anywhere in the study, which is titled *Associations of Mortality with Long-Term Exposures to Fine and Ultrafine Particles, Species and Sources: Results from the California Teachers Study Cohort* and is available here: <https://ehp.niehs.nih.gov/doi/10.1289/ehp.1408565>. It is also important to note that just as PM_{2.5} is a subset of PM₁₀, PM_{1.0} is a subset of PM_{2.5}. Therefore, the analysis of PM_{2.5} criteria pollutant emissions provided in the EIR and the associated construction Health Risk Assessment (HRA), which was prepared in accordance with OEHHA methodology, does inherently include an analysis of ultrafine particulate matter. As described in detail within the EIR and the associated construction HRA, with the implementation of all required mitigation measures – including the use of U.S. Environmental Protection Agency (USEPA) Tier 4 engines

on all construction equipment – impacts to sensitive receptors would be less than significant when compared to the SCAQMD thresholds for criteria air pollutant emissions and the California Air Resources Board (CARB) thresholds for TACs.

Comment TRAO-28

The comment states that the industry standard for estimating the health impacts of construction activities is CalEEMod. As described in Master Response 10 – Air Quality Analysis, it should be clarified that the quantification of criteria air pollutant emissions was completed using the SCAQMD’s CalEEMod. However, the analysis of potential health impacts associated with TACs was supported by detailed modeling results that rely on the USEPA’s AERMOD and the CARB’s Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool.

The comment goes on to make speculative and unsubstantiated claims regarding the construction schedule that has been described for the proposed Project. Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities* clearly delineate the number of truck trips associated with each subphase of construction associated with Phase 1 and Phase 2 of the proposed Healthy Living Campus Master Plan, respectively. These estimates, as with all heavy construction equipment estimates, were developed with significant input from construction managers/schedulers at CBRE and were supported by a robust Construction Management Plan that was developed to describe construction activities, sequencing, and heavy equipment requirements. It should also be noted that this level of detail is not required for a CEQA-compliant impact analysis, and that CalEEMod is often run using default construction assumptions. Therefore, the analysis in the EIR goes beyond minimum CEQA requirements and provides a robust analysis of these potential air quality impacts.

The comment also makes speculative claims about swings in the construction schedule, asserting that there may be times where truck trips are delayed and must be made up for the next day. Consistent with the requirements of CEQA Guidelines 15003, the description of construction activities clearly makes a “...a good-faith effort at full disclosure” and is based on detailed construction scheduling information provided by a qualified construction management firm with decades of experience managing projects far more complex than the proposed redevelopment of the BCHD campus. This analysis based on expert input, accounts for the typical variations in construction schedules that can occur, and provides detailed emissions projections based on this information. As described in Section 3.2, *Air Quality*, the quantified peak daily construction emissions disclosed in the EIR represent the potential worst-case maximum daily emissions of a construction day, and do not represent the lesser emissions that would typically occur during every day of construction associated with the proposed Project. For example, although compliance with

SCAQMD rules and regulations would be required during construction (e.g., SCAQMD Fugitive Dust Rule, etc.), compliance with these rules were not included in CalEEMod in order to prepare a conservative analysis of the potential worst-case unmitigated construction emissions. Additionally, as shown in Table 3.2-5, the analysis considers the worst-case unmitigated emissions during any given year as the peak daily total. For example, the analysis considers the emissions of carbon monoxide (CO) to be 55 pounds per day during all phases of construction, even though this level of CO emissions would only occur during the third year of construction in Phase 2 (2031). Given these conservative assumptions, it is unreasonable, and unsupported by substantial evidence, to assert that there would be routine, prolonged, two-fold increases in maximum daily construction activities or associated air pollutant emissions.

It should also be noted that the air quality analysis addresses impacts from each piece of heavy construction equipment located on the Project site, not just haul trucks. Even with the assumption of hypothetical task completion date bonuses that have been raised in the comment, if material export is not required during a particular day, other construction activities and heavy equipment use would still occur on the Project site. The opposite would also be true during periods of increased material export, when other construction activities would be reduced to accommodate the increased activity of haul trucks on-site. The CalEEMod analysis conservatively assumes the maximum overlap of activities consistent with physical limits on heavy equipment use associated with variables including, but not limited to, the rate of excavation, demolition, and construction, the time required for material loading and delivery, and the limitation on construction hours as required by the RBMC and TMC, etc.

For the purposes of assessing TACs during construction, the construction HRA conservatively quantifies cancer risk and non-cancer chronic health effects at the point of maximum impact (PMI) and for the maximum exposed individual resident (MEIR). The PMI is the location where the cancer risk or non-cancer chronic health effect is maximum, regardless of the presence of a human receptor at that location. No concentration higher than the PMI would occur from the proposed construction activities. The MEIR is the location with the highest cancer risk or non-cancer chronic health effect where a person can be reasonably present. Health risk calculations were performed using the OEHHA methodologies and exposure parameters (including age sensitivity factors) as well as the corresponding SCAQMD guidance documents to ensure that the EIR provides a reasonable analysis of these issues.

For additional detailed discussion and response to comments regarding the methodology, assumptions, and results of the quantitative air quality model refer to Master Response 10 – Air Quality Analysis.

Comment TRAO-29

The comment selectively excerpts a portion of the of the EIR that summarizes the findings of the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch Case (April 6, 2015, Attachment A). As described in the EIR, it is important to note that it was the relevant regulatory agency, SCAQMD, which concluded that “...*regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations associated with individual projects.*” Regional modeling tools are generally designed to be used at the national, State, regional, and/or city levels, and are not well equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project would directly impact human health in a particular area. This is not a specific position or approach by BCHD to plow ahead as the commenter asserts.

It should be noted that even though the proposed Project would be consistent with the SCAQMD’s 2016 Air Quality Management Plan (AQMP) as discussed under Impact AQ-1, issues related to impacts to human health are addressed in detail under Impact AQ-4 and supported by a construction HRA that evaluated individual lifetime cancer risks and non-cancerous chronic hazard index (HIc) associated with diesel particulate matter (DPM) emissions during construction activities associated with the Phase 1 preliminary site development plan and the Phase 2 development program.

Comment TRAO-30

The comment asserts that the fugitive dust control mitigations are not sufficient and suggests the incorporation of additional mitigation measures to be reviewed and approved by the City of Redondo Beach and the City of Torrance. Most notably the comment calls for an Air Quality Compliance Monitor to be on-site during all construction activities during which fugitive dust is generated. As described in Master Response 10 – Air Quality Analysis, CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...*until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*” A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. Therefore, the EIR provides robust recommendations for fugitive dust control and a monitoring program that would ensure implementation.

Though no citations or references are provided, the other provisions listed in the comment appear to be taken from SCAQMD fugitive dust mitigation measures that are compiled in Tables XI-A through XI-E and are publicly available here: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust>. These measures shall be implemented if required for compliance with applicable SCAQMD rules during construction, and would be required separately from the implementation of mitigation measures as a matter of regulatory compliance (refer to Section 3.2.2, *Regulatory Setting*). Both CARB and SCAQMD regulate and enforce air pollution regulations. Both agencies have the right to conduct inspections of air pollution sources, and the right to issue violations that can lead to penalties. BCHD and its construction monitors would cooperate with any such regulatory agency follow up and inspections, as well as ongoing monitoring and inspections from responsible agencies such as the City of Redondo Beach.

Comment TRAO-31

The comment asserts that by closing windows in response to noise, residents and other building occupants would be subjected to formaldehyde-related carcinogenic effects. While a quote is provided from Certified Industrial Hygienist Francis Offerman, along with a link to his resume as an expert witness, the context in which this statement was made is unknown and no supporting documentation was provided by the commenter. Without specific knowledge of building materials and the indoor air environment on the BCHD campus, this comment is speculative and its alleged application to the Proposed project unsupported by substantial evidence.

Comment TRAO-32

The comment restates that the EIR must adhere to a higher standard and that compliance with the required mitigation measures must be monitored. However, the EIR provides robust analysis and detailed mitigation measures and a comprehensive MMRP to ensure compliance. Refer to the responses to Comment TRAO-25 and TRAO-30.

Comment TRAO-33

This comment presents a list of issues concerning the noise analysis, which are addressed in detail in the responses to Comment TRAO-34 through TRAO-38. Refer to Master Response 12 – Noise

Analysis for detailed discussion and a response to comments pertaining to the quantitative noise modeling, assumptions, and results.

Comment TRAO-34

This comment references Table 3.11-16 in the EIR, which identifies temporary, but prolonged, construction-related noise impacts to on- and off-site sensitive receptors. The comment correctly notes that temporary, but prolonged construction-related noise would exceed the identified Federal Transit Authority (FTA) thresholds for the following sensitive receptors:

- West Torrance residents adjacent to Flagler Alley;
- West Torrance residents adjacent to Flagler Lane;
- Redondo Beach residents along Beryl Street to the North; and
- Redondo Beach residents along North Prospect to the North.

The comment notes that the threshold of significance for noise impacts identified in the EIR is based on the FTA *Transit Noise and Vibration Impact Assessment Manual*, which states that an 8-hour continuous noise level (L_{eq}) of 80 dBA and a 30-day average of 75 dBA L_{dn} is a reasonable criterion for assessment of construction activities on residential land use. As described in the EIR, this unit of measurement is appropriate because L_{eq} can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,
- Average noise over all phases of the construction.

Given the duration of construction activities associated with the Phase 1 site development plan and the more general Phase 2 development program, the noise metric L_{dn} , averaged over 30-days, was also assessed.

The comment asserts that the noise analysis should also address the effects of L_{max} . It should be noted that the typical ranges of L_{max} at 50 feet for typical construction equipment that would be used during construction are disclosed in Table 3.11-15. As described in Section 3.11.4, *Impact Assessment and Methodology*, construction noise levels at on- and off-site locations were estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model where inputs included distance from construction equipment to receptor, equipment types, and usage factor, which is presented as a percentage of the equipment operating at full power within a given

time frame. L_{max} noise levels for each piece of heavy construction equipment were considered as inputs during the preparation of the noise analysis. However, as a matter of common practice, construction impact analyses does not make findings based on L_{max} alone. This is because construction-related noise levels fluctuate by day or even by hour with each construction activity (e.g., demolition, grading, foundation construction, framing, interior work, etc.) as well as the specific location of heavy construction equipment and the duration of use. It is unreasonable to assert that a sensitive receptor would experience the L_{max} for the entire duration of construction, because that would mean that the same piece of construction equipment would be located in the same location operating at maximum capacity for the entire duration of construction.

Further, the comment does not suggest any specific threshold related to L_{max} . As described in Section 3.11.3, *Regulatory Setting*, construction activities are permitted in Redondo Beach between 7:00 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (RBMC Sections 4-24.503 and 9-1.12). Similarly, construction activities are permitted in Torrance between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (TMC Section 6-46.3.1). Neither of the local noise ordinances establish quantitative noise limits or other standards for construction. For that reason, the Detailed Analysis Construction Noise Criteria presented in the FTA's *Transit Noise and Vibration Impact Assessment Manual* have been used as reasonable criteria for assessment and, if exceeded, could result in adverse community reaction. Pursuant to CEQA Guidelines Section 15064.7(b) lead agencies have discretion to formulate their own significance thresholds and may use thresholds on a case-by-case basis. CEQA Guidelines Section 15064.7(c) states that “[w]hen using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency...is supported by substantial evidence.” The use of the FTA Detailed Analysis Construction Noise Criteria clearly meets these requirements. Finally, urban redevelopment projects by nature often involve prolonged construction noise that can impact adjacent uses in already built out communities. The EIR provides analysis of such impacts and requires stringent mitigation measures to reduce such impacts along with ongoing monitoring to be implemented through the MMRP. This approach complies with CEQA requirements and local ordinances and commits BCHD to reducing such impacts to the maximum extent feasible.

Comment TRAO-35

The comment incorrectly states that the potential impacts of Emergency Medical Technician (EMT) sirens are not analyzed. Impact NOI-1 in Section 3.11, *Noise* clearly discloses noise associated with emergency responses. As described therein, the development of Phase 1 of the

proposed Healthy Living Campus Master Plan would incrementally increase the total number of individuals requiring ambulance services through the proposed addition of 177 new Assisted Living bed spaces to the existing 120 Memory Care bed spaces, bringing the total permanent residents supported at the site to 297. Based on an assumed average of 0.82 annual calls per bed space per year to the existing BCHD campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the BCHD campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). When sirens are necessary for an emergency response, they typically emit noise at a magnitude of approximately 100 dBA at 100 feet. A decrease of approximately 3 dBA occurs with every doubling of distance from a mobile noise source. Therefore, during a response requiring sirens, residences along North Prospect Avenue and Beryl Street experience peak short-duration exterior noise levels between 91 and 100 dBA. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic. Thus, given the infrequent and short duration of siren utilization responding to emergency situations, noise impacts from emergency vehicles would constitute intermittent nuisance noise in surrounding areas, but would be less than significant. As described further in the response to Comment TRAO-124, the local wind and topography may create an environment in which siren noise can also be heard at a longer distance and for longer durations, given the distance from the source and intervening structures alone, this would not constitute an exposure to peak noise levels of 91 to 100 dBA. Again, such periodic noise generation would constitute periodic nuisance noise and would not exceed accepted thresholds and would therefore be less than significant.

While there have been studies and documented instances related to occupational hearing loss related to sirens (e.g., EMTs, firefighters, etc.), the results generally indicate a correlation between hearing loss and the duration of siren noise exposure. (As an example, please see *Accelerated hearing loss in urban emergency medical services firefighters* available here: <https://pubmed.ncbi.nlm.nih.gov/3985464/>.) The assertion that sensitive receptors within the vicinity of the BCHD campus would experience hearing loss as a result of an estimated total of 244 ambulance calls per year (i.e., approximately 20 calls per month) is unfounded and not supported by the literature cited in the comment. Such health-related noise impacts are typically related to long-term exposure to very frequent high-level noise and not periodic short-term noise events.

Comment TRAO-36

This comment asserts that if the proposed Project is implemented, adjacent sensitive receptors could experience headaches, increased allergy symptoms, insomnia, and other health issues. However, the provided citation generally discusses the broad spectrum of noise sources in the modern setting, does not specifically address construction-related noise (with the exception of brief references to on-site construction workers), and does not reference any one of the aforementioned symptoms and therefore does not appear to constitute substantial evidence in the record to support such contentions.

The comment goes on to correctly summarize that the EIR identifies a potentially significant noise impact as construction noise levels cannot be mitigated to a less than significant level due to technical issues and constraints associated with the construction of noise barriers for the proposed Project. However, the comment claims that MM NOI-1 ignores numerous measures and broadly cites the International Organization for Standardization (ISO) 11690 series as well as the Acoustical Society of America to support this assertion. First it is important to note that MM NOI-1 requires the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division as well as the Torrance Building & Safety Division for activities within the City of Torrance right-of-way. MM NOI-1 is not intended to reduce or in any way limit the implementation of appropriate measures to reduce construction-related noise. Therefore, this mitigation measure has been revised to state: *“BCHD’s construction contracts shall require implementation of all construction best management practices (BMPs) identified in the Construction Noise Management Plan, which could include, but would not be limited to the following:...”*

However, with regard to ISO 11690 and the Acoustical Society of America citations provided in the comment, these publications specifically deal with occupational noise. For example, ISO 11690 specifically states that *“[t]he ISO 11690 series should be useful to persons such as plant personnel, health and safety officers, engineers, managers, staff in planning and purchasing departments, architects and suppliers of plants, machines and equipment...By giving guidelines for noise control strategies and measures, the ISO 11690 series aims at a reduction of the impact of noise on human beings at workplaces. Assessment of the impact of noise on human beings is dealt with in other documents.”* It was for this reason ISO 11690 and the Acoustical Society of America were not specifically cited in MM NOI-1, as it appears largely inapplicable to construction-related noise.

With regard to the suggestion for enclosures, MM NOI-1 has been revised to state: *“If required by the City of Redondo Beach Building & Safety Division or the City of Torrance Building & Safety*

Division for construction activities within the City of Torrance right-of-way, enclosures could also be used for specific pieces of construction equipment.” This approach would clearly not be practicable for large pieces of heavy equipment (e.g., cranes) or mobile equipment (e.g., graders); however, it could be feasible for smaller stationary equipment (e.g., generators).

Comment TRAO-37

The comment incorrectly states that the noise impacts during transitions are not analyzed, implying that the noise analysis did not consider sensitive receptors on-site during the proposed demolition of the Beach Cities Health Center that would occur toward the end of Phase 1. As described under Impact NOI-1 and as clearly shown in Table 3.11-16, the construction noise analysis for Phase 1 did consider on-site sensitive receptors during demolition activities. Additionally, as described under Impact NOI-1 and as clearly shown in Table 3.11-17, the construction noise analysis in Phase 2 also considered the on-site RCFE Building, including the Assisted Living units and Memory Care units. However, contrary to the suggestion that the EIR is required to specify the plan to compensate for the loss of business and/or waiver of lease default penalties these financial issues do not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

Comment TRAO-38

The comment asserts an opinion that under schedule pressure and the forfeiture of bonuses mitigation measures may not be appropriately enforced. The comment goes on to suggest monitoring provisions for inclusion in a noise suppression plan. It is important to note that MM NOI-1 requires the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division and the Torrance Building & Safety Division for activities within the City of Torrance right-of-way. As described in MM NOI-1, during construction, BCHD would be required to monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Construction Noise Management Plan. Further, BCHD would be required provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD would be required keep a log of complaints and address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach Building & Safety Division and the Torrance Building & Safety Division would have the authority require modification to the conditions of the Construction Noise Management Plan, that fall under their respective jurisdictions, if necessary, to address non-performance issues. Thus, mitigation monitoring and enforcement will be vigorously overseen and led by BCHD and its contractors, while other agencies such as the cities of Redondo Beach and Torrance as well as other regulatory agencies

(e.g., SCAQMD) will all participate in monitoring and enforce within their respective jurisdiction and areas of authority. CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment TRAO-39

This comment raises overarching issues with the transportation analysis, which are addressed in detail in the responses to Comment TRAO-40 through TRAO-66. Refer to Master Response 14 – Transportation Analysis for detailed discussion and a response to comments pertaining to the quantitative modeling, assumptions, and results of the transportation studies prepared by Fehr & Peers.

Comment TRAO-40

The comment states that the designation of an environmental impact as significant in an EIR does not permit the EIR dismiss the discussion and description of the magnitude of that impact. This statement is generally consistent with the requirements in CEQA Guidelines Section 15126.2. However, it should be noted that the EIR includes thorough discussions and descriptions of the potential environmental impacts, including potential impacts to transportation. Further, that the magnitude of each impact identified in Section 3.14, *Transportation* is also described. To be clear Section 3.14, *Transportation* does not identify any significant and unavoidable impacts.

Comment TRAO-41

The comment summarizes the technical findings of the Non-CEQA Intersection Operational Evaluation prepared by Fehr & Peers and included as Appendix J to the EIR. As discussed in detail in Section 3.14.2, *Regulatory Setting*, it should be noted that changes in State law now require that CEQA analysis be based on vehicle miles traveled (VMT) by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing level of service (LOS) by measuring intersection congestion and roadway capacity. This reflects State policy goals to reduce vehicle energy use, particularly energy use associated with non-renewable fossil fuels, and associated greenhouse gas (GHG) emissions and their adverse effects on global climate change. Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and interested residents understand this issue, which contains a detailed assessment of traffic circulation issues,

with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

Comment TRAO-42

The comment simply cites the definitions of LOS provided in the Non-CEQA Intersection Operational Evaluation; Table 4 provides the LOS definitions for signalized intersections and Table 5 provides the LOS definitions for unsignalized intersections. In addition, Table 6 presents the existing LOS for each of the evaluated intersections.

Comment TRAO-43

While the comment correctly states that seven intersections would operate at LOS E or LOS F at one or both of the peak hours, the comment fails to acknowledge that the intersections would operate at these conditions without the implementation of the proposed Project as described for the Cumulative (2032) Baseline condition. In fact, implementation of the proposed Project would result in a minor reduction in the volume-to-capacity (V/C) ratio or intersection delay for the AM and PM peak hour at each of these intersections, with the exception of the intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street. This, again, is due to the minor reduction in peak hour trips associated with the proposed Project. The intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street would experience a minor increase in the V/C ratio or intersection delay as a result of the redistribution of vehicle trips associated with the proposed Project; however, as with each of the other intersections evaluated in the Non-CEQA Intersection Operational Evaluation, these minor increases in V/C ratios or intersection delays would not exceed the thresholds of evaluation as identified by the City of Redondo Beach or the City of Torrance.

The suggested mitigation measures are unnecessary and would exceed requirements of CEQA because: 1) SB 743 and CEQA Guidelines 15064.3 eliminates the measurement of vehicle delay,

or LOS, as a metric that can be used for measuring traffic impacts; and 2) the minor increases in V/C ratios or intersection delays at the intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street would not exceed any thresholds of evaluation previously identified by the City of Redondo Beach or the City of Torrance.

Comment TRAO-44

The comment notes that Section 3.2, *Air Quality* only identifies five intersections that would operate at LOS E or LOS F under future operational year (2032) plus Project conditions. This list has been corrected to include the following two intersections that were inadvertently omitted:

- Flagler Lane & 190th Street (AM and PM peak hour)
- Harkness Lane & Beryl Street (AM and PM peak hour)

This minor correction does not affect the analysis of CO hotspots, because the most heavily trafficked intersection within the vicinity of the Project site that would be affected by the proposed Project is still Hawthorne Boulevard & Del Amo Boulevard. As described in Section 3.2, *Air Quality*, this intersection currently experiences approximately 89,300 vehicle trips per day, or approximately 89.3 percent of the 100,000 vehicles per day experienced at the Wilshire Boulevard and Veteran Avenue intersection evaluated in the CO Plan for the SCAQMD's 2003 Air Quality Management Plan.

Comment TRAO-45

The comment asserts that there was no analysis directed at reducing the deficiencies of the existing public transit network. Implementation of the proposed Project would not adversely affect the operation of the existing public transit network. For example, the comment asserts that BCHD should work with the six County Transportation Commissions that make up the Southern California Association of Governments (SCAG). The EIR provides extensive analysis of the existing transportation network – including public transit, bicycle, and pedestrian facilities – and its relationship to the proposed Project. The EIR finds that the proposed Project would not generate an increase in daily vehicle trips or VMT that would result in a significant transportation impact. Nevertheless, mitigation MM T-1 is recommended to provide additional information and guidance on the proposed TDM measures to be included in the Transportation Demand Management (TDM) plan required pursuant to RBMC Section 10-2.2406. The TDM plan, which would further reduce an impact that is already less than significant, would encourage visitors to travel to the campus via active transportation (e.g., walking, biking, etc.), consistent with BCHD's mission to promote health and well-being. For example, BCHD would provide a bicycle sharing program for access

to the adjacent bicycle paths and local surroundings as well as bicycle facilities, such as bicycle parking, a bicycle repair station, and employee shower and locker facilities. The TDM plan would also include transit and carpool incentives for employees, such as subsidized Beach Cities Transit passes and designated parking for vanpools and carpools. Therefore, the EIR requires BCHD to go beyond CEQA requirements for mitigation to encourage use of alternative transportation to further reduce minor incremental increases in vehicle trips associated with the proposed Project.

Comment TRAO-46

The comment selectively quotes and contests the conclusion that there are no discernable existing hazards in the vicinity of the Project site due to roadway and driveway configuration but fails to acknowledge the EIR's extensive supporting discussion regarding circulation hazards, with supporting technical analysis prepared by Fehr & Peers, a nationally recognized transportation planning and engineering firm.

As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. Based on the most recently available 5-year collision data (between 2013 and 2018), 323 collisions (i.e., approximately 27 per year on average) occurred within the vicinity of the Project site on streets used to access the site. Of the total number of collisions, which included people driving, walking, and biking, 12 resulted in serious injury and five resulted in fatalities (refer to Table 3.14-2).

Immediately adjacent to the Project site, along Beryl Street and North Prospect Avenue, there was a smaller number of collisions, as compared to other arterial roadway segments in the region such as Hawthorne Boulevard, West 190th Street, and Del Amo Boulevard. In total, there were 17 collisions between 2013 and 2018 (i.e., approximately 5.3 percent of total collisions during the period), which were on the Beryl Street and North Prospect Avenue segments and/or within 200 feet of a key intersection on roadways used to access the Project site. Of these collisions, three collisions resulted in serious injury and one resulted in a fatality. The fatality occurred at North Prospect Avenue & Diamond Street, and involved a motorcyclist. Five collisions occurred at North Prospect Avenue & Diamond Street (closest to the southernmost driveway at the Project site), which was the highest number of collisions closest to the Project site. There were no discernable patterns with regard to collision types (e.g., broadside, rear end, or head-on collisions).

The EIR provides an in-depth discussions of transportation safety issues in the vicinity of the Project site to support its conclusions. The comment provides no substantial evidence to contest these findings.

Comment TRAO-47

The comment selectively quotes the simple definition of cut-through traffic provided in Section 3.14.1, *Environmental Setting* and incorrectly uses it to assert that the EIR has acknowledged that cut-through traffic would be exacerbated by the proposed Project.

This issue of cut-through traffic has been studied by Fehr & Peers (see Appendix K) as well as the City of Torrance, including various field studies, observations, and traffic counts conducted during the preparation of the EIR. As described in Section 3.14.1, *Environmental Setting*, based on these studies, cut-through traffic in these the neighborhood to the east of the Project site is associated with commuting as well as student pick-up and drop-off at Towers Elementary School.

As described under Impact T-3, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by turning right off of Flagler Lane and exit the building turning left onto northbound Flagler Lane (refer to Figure 2-8). Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to parking on the BCHD campus and as such, would not be a primary entrance to the campus. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood. Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation, the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times and thus would either not contribute to or generate increased neighborhood cut-through traffic. Based on detailed analysis by Fehr & Peers, this minor reduction in overall peak hour vehicle trips would not increase congestion and may provide incremental improvements in the movement of traffic and less incentive for drivers to cut-through the adjacent residential neighborhoods. Therefore, the proposed Project would not contribute to operational safety hazards related to cut-through traffic, and impacts would be less than significant.

Finally, the comment represents general unsupported opinion and does not raise any issues regarding the adequacy of the analysis of cut-through traffic presented under Impact T-3.

Comment TRAO-48

The comment raises general issues, without substantial evidence or expert opinion, about potential pedestrian-vehicle safety conflicts related to the proposed vehicle access off of Flagler Lane. However, the EIR exhaustively analyzes potential transportation-related impacts, including potential pedestrian-vehicle safety issues related to the proposed vehicle access off of Flagler Lane (refer to Impact T-3). The development of new sidewalks as a part of the BCHD Bike Path Project are addressed in the cumulative impacts discussion. As described therein, implementation of the Class II bicycle lane along Flagler Alley and segments of Flagler Lane and Diamond Street would be designed with consideration of the proposed Project design features to protect pedestrians and bicyclists along the Class II bicycle lanes as they cross Towers Street. Further, as with the proposed Project, the BCHD Bike Path Project would be subject to site plan review and would meet local street design and access requirements enforced by the Redondo Beach Building & Safety Division. For this reason, implementation of the proposed Project would neither result in safety impacts nor create a substantial contribution to cumulatively considerable impacts related to design features.

Comment TRAO-49

The comment asserts that the additional access point off of Beryl Street is not needed, and that the EIR should consider an alternative that would distribute traffic to North Prospect Avenue for the purpose of reducing the potential for vehicle-pedestrian and vehicle-bicycle conflicts along Flagler Lane, where the future bicycle path is being designed. However, this comment expresses an unsubstantiated opinion about the proposed Project that has been subject to extensive planning and design consideration. In addition, as discussed in detailed in response to comment TRAO-49, the EIR thoroughly describes the potential for vehicle-pedestrian and vehicle-bicycle conflicts along Flagler Lane.

Additionally, the EIR does include the analysis of Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative, each of which includes an alternative access and circulation scheme that eliminates the proposed vehicle access on Flagler Lane. While not specifically necessary to reduce any identified vehicle-pedestrian and vehicle-bicycle conflicts, the implementation of any of these alternatives would entirely avoid vehicle entry/exit along Flagler Lane.

Comment TRAO-50

The comment asserts that the existing curb cut and driveway to the vacant Flagler Lot is temporarily closed off at the direction of BCHD and claims, without substantial evidence or

analysis, that there is no need for additional access points (also refer to the response to comment TRAO-50). As described in Section 2.0, *Project Description* the additional vehicle access points along Flagler Lane would provide for the preferred internal circulation within the BCHD campus, with this current design subject to considerable consideration by BCHD. One driveway would serve a left-turn only exit from the proposed pick-up/drop-off zone located on the vacant Flagler Lot. A second driveway is proposed as an entry/exit to the subterranean service area and loading dock associated with the RCFE Building. Nevertheless, Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, which is designated as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. The City of Torrance is also considering the potential removal of southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood issues related to existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. For these reasons, Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative each consider an alternative access and circulation scheme, which eliminates the proposed vehicle access on Flagler Lane.

Comment TRAO-51

The comment incorrectly claims that the transportation analysis presented in the EIR is limited to a discussion of VMT and further asserts that no other analyses were conducted. In contrast with this assertion, the EIR thoroughly analyzes all aspects potential transportation-related impacts, focusing on CEQA mandated issues such as VMT as well as roadway geometry and safety. As acknowledged in the comment and as described further in Section 3.14, *Transportation*, under SB 743, the focus of transportation analysis has shifted from LOS to VMT and the reduction of GHG emissions. As a result, Section 15064.3 was added to CEQA Guidelines, which states “...generally, vehicle miles traveled is the most appropriate measure of transportation impacts.”

Nevertheless, contrary to the assertion in the comment that the EIR provides no other analysis, Section 3.14, *Transportation* also discusses consistency with: plans, ordinances, and polices; geometric design features and incompatible use hazards and emergency access; and cut-through traffic analysis. Each of these analysis is supported by detailed technical transportation studies based on quantitative construction assumptions or quantitative data provided in the transportation

studies prepared by Fehr & Peers. As previously discussed in the response to Comment TRAO-41, at the request of the City of Redondo Beach and the City of Torrance, and separate from the Vehicle Miles Traveled Study, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and the City of Torrance (see Appendix J).

Comment TRAO-52

The comment cites Section 5.5.3, *Alternative 3 – Revised Access and Circulation*, which acknowledges that the City of Torrance is considering the potential removal of southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood issues associated with existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project.

The comment asserts, without support of technical analysis or expert opinion, that service and delivery vehicles could choose to drive through the Torrance neighborhood to enter the service area and loading dock entrance. However, the comment fails to acknowledge TMC Section 61.9.1, Commercial Vehicles; Load Limits on Streets, which states:

“Any commercial vehicle exceeding the maximum gross weight of eight thousand (8,000) pounds is hereby prohibited from using any street in the City of Torrance except as hereinafter provided.

A commercial vehicle is a vehicle of a type required to be registered under the Vehicle Code of the State of California used or maintained for the transportation of persons for hire, compensation, or profit or designed, used and maintained primarily for the transportation of property.”

Therefore, as described in Section 5.5.3, *Alternative 3 – Revised Access and Circulation*, the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street would not exacerbate cut-through traffic; rather, it would conflict with and eliminate the use of the service access along Flagler Lane, consistent with the requirements of TMC Section 61.9.1. For that reason, *Alternative 3 – Revised Access and Circulation*, *Alternative 4 – Phase 1 Preliminary Site Development Plan Only*, *Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure*, and *Alternative 6 – Reduced Height Alternative* each consider an

alternative access and circulation scheme, which eliminates the proposed vehicle access on Flagler Lane.

Comment TRAO-53

The comment states that the transportation and air quality impact analyses declare impacts to be less than substantial or less than substantial with mitigation and requests that the EIR define these terms. However, this comment inaccurately portrays discussion in the EIR and neither the transportation nor air quality impact analysis use these terms to discuss impacts associated with the proposed Project. The analysis does discuss whether impacts associated with the proposed Project would “*substantially contribute to cumulatively considerable impacts.*” This terminology is defined in CEQA Guidelines Section 15065(a)(3), which states that “[c]umulatively considerable’ means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

Comment TRAO-54

The comment incorrectly states that the analysis in the EIR of the effects of traffic-induced GHG emissions is either vague or not present. However, the EIR provides an exhaustive discussion of mobile source GHG emissions is provided in Section 3.7, *Greenhouse Gas Emissions and Climate Change* and is supported by quantitative modeling provided in Appendix B. The need for the suggested mitigation measures is unfounded as no significant impacts have been identified in Section 3.7, *Greenhouse Gas Emissions and Climate* or Section 3.14, *Transportation*. In fact, as described in Table 3.7-7, the proposed Project would result in a reduction of 741.7 metric tons of carbon dioxide equivalent (MT CO_{2e}) per year. As such, the proposed Project would result in a minor beneficial impact with regard to GHG emissions.

Comment TRAO-55

The comment questions whether BCHD has received authorization to expand its sphere of influence. However, the proposed Project does not propose to expand or otherwise change BCHD’s sphere of influence. In addition, it is unclear what is meant by this question with respect to VMT. However, to provide potentially relevant context, Fehr & Peers obtained average trip length data for the BCHD campus using StreetLight location-based service data from 2019, prior to the onset of the COVID-19 pandemic. Using the StreetLight portal, Fehr & Peers mapped the relative weight of the origin/destination grid cells to and from the BCHD campus, which revealed that the average weekday trip length to and from the BCHD campus is 6.4 miles, and the average weekend trip length is 6.3 miles. Given that the proposed Project would redevelop the existing

campus with uses that would continue to serve the Beach Cities and surrounding South Bay communities, existing trip lengths are likely to remain similar under the proposed Project. StreetLight data were also evaluated for Brookdale South Bay located at 5481 West Torrance Boulevard in Torrance. Fehr & Peers calculated an average trip length of 4.8 miles using the StreetLight data for Brookdale South Bay. These data supported the findings of less than significant impacts to VMT.

Comment TRAO-56

The comment states that BCHD must clearly state and commit to funding mitigations that will result from unmitigated significant impacts to greenhouse gases, air quality, transportation, and land use. However, the EIR clearly sets out the required mitigation measures for these impacts and CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 requires that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

The comment also suggests a number of mitigation measures identified by the Southern California Association of Governments (SCAG) that are capable of avoiding or reducing the potential for conflict with the established measures of effectiveness for performance of the circulation system. However, the suggested mitigation measures are not needed because the proposed Project would not result in any significant transportation impacts. The EIR already goes beyond minimum CEQA requirements by requiring a comprehensive TDM plan be implemented to further reduce already limited Project related transportation impacts.

Comment TRAO-57

The comment states that the EIR must provide information about how many trips may come from outside the surrounding area as well as other information describing what cities will be served, how far will the clients travel, and what routes and services will be impacted. However, the EIR already thoroughly addresses these issues. Each of these questions is addressed in the Vehicle Miles Traveled Study provided by Fehr & Peers (see Appendix K). As described in the response to Comment TRAO-55, the average weekday trip length to and from the BCHD campus is 6.4 miles and the average weekend trip length is 6.3 miles. Given that the proposed Project would redevelop the existing campus with uses that would continue to serve the Beach Cities and surrounding South Bay communities, existing trip lengths are likely to remain similar under the proposed Project. StreetLight data were also evaluated for Brookdale South Bay located at 5481 West Torrance Boulevard in Torrance. Fehr & Peers calculated an average trip length of 4.8 miles using the StreetLight data for Brookdale South Bay to estimate the average trip lengths associated with the proposed Assisted Living program and Memory Care community. Together, these data supported the findings of less than significant impacts to VMT.

Comment TRAO-58

The comment contends that the Transportation Demand Plan (TDP); presumably this comment is referring to the TDM plan described under Impact T-2. However, the EIR already requires a comprehensive TDM plan to further reduce vehicle trips associated with the proposed Project. As described therein the proposed Project would not generate VMT that would result in a significant transportation impact, MM T-1 is recommended to assist in implementing the TDM plan required for the proposed Project pursuant to RBMC Section 10-2.2406, which would further reduce this less than significant impact. Implementation of the TDM plan would generally include promotion of alternative transportation modes and carpool incentives for employees, which would further reduce VMT associated with the proposed Project. The TDM plan would also encourage visitors to travel to the BCHD campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being. The TDM plan would also include transit and carpool incentives for employees, such as subsidized Beach Cities Transit passes and designated parking for vanpools and carpools.

The need for the incorporation of the additional items described in the comment (e.g., *“strategies, as determined to be appropriate by the cities, that would produce a minimum fifteen [15] percent reduction of new vehicle trips to the HLC”*) are unnecessary, and not supported by substantial evidence in the record or technical studies, because the proposed Project would result in a less than significant impact to VMT.

Comment TRAO-59

The comment asserts that construction traffic impacts are not adequately analyzed and states that a detailed Construction Worksite Traffic Control Plan must be prepared. However, the EIR exhaustively analyzes construction-related traffic impacts. In addition, the comment provides no evidence to support this contention and does not comment on the sufficiency of any specific aspects of the analysis of construction-related traffic. It should also be noted that MM T-2 already requires the preparation and implementation of a Construction Traffic Control Plan, subject to review by the County Department of Transportation (DOT) and Redondo Beach Engineering Division prior to issuance of a CUP. In addition, each of the requested measures is already incorporated in MM T-2. The only exception is the request for a “[d]etermination of whether or not the mitigation efforts developed above combined with other mitigation and regulatory compliance measures in the EIR are equal to or more effective than the SCAG RTP/SCS Program EIR T-2 in avoiding conflicts with any other congestion management program within the jurisdictions of the BCHD.” No explanation of need for this suggested measure is provided, however, and it would not be needed because the proposed Project would be consistent with the relevant policies of the SCAG Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) (refer to Impact T-1). Moreover, as described in Section 3.14.2, *Regulatory Setting*, both the County and the City of Redondo Beach have opted out of the Congestion Management Program as authorized in accordance with the California Government Code Sections 65082 et seq.

Comment TRAO-60

The comment asserts that construction worker parking access impacts are not analyzed. However, the EIR reviews potential construction worker parking and access impacts and requires mitigation. MM T-1 clearly states that the Construction Traffic and Access Management Plan, which shall be prepared in coordination with the County Department of Transportation and the Redondo Beach Engineering Division shall “[m]inimize parking impacts both to public parking and access to private parking to the greatest extent practicable.” As described under Impact T-1, at a minimum the plan would include:

- *“On-site staging areas, which would avoid residential streets to the maximum extent feasible;*
- *Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction flaggers at the three driveways along North Prospect Avenue as well as the proposed driveways along Beryl Street and Flagler Lane) to address circulation*

requirements and public safety in accordance with the standards in the County DOT Area Traffic Control Handbooks;

- *Emergency access provisions (i.e., North Prospect Avenue and Beryl Street); and*
- *Construction crew parking.”*

The last bullet has been revised to describe “*On-site construction crew parking to the maximum extent feasible. Prohibition of crew parking in adjacent residential neighborhoods.*” The additional measures suggested in this comment will be incorporated into the Construction Traffic and Access Management Plan if required by the County Department of Transportation and the Redondo Beach Engineering Division during the development of the plan.

Comment TRAO-61

The comment asserts that a Bicycle Usage Plan must be prepared as a part of the TDM plan and suggested a number of measures that should be included. However, the comment does not provide any evidence to support this assertion. Further, as described in Section 2.5.1.3, *Proposed Access, Circulation, and Parking*, bicycle facilities would be provided for employees, residents, participants, and other visitors to the campus. Short-term bicycle parking would be provided at the main entrance off of North Prospect Avenue. Bicycle facilities would also include a bicycle repair station and shower and locker facilities. In addition, as described in Section 2.5.1.5, *Sustainability Features*, the proposed Project would implement a TDM plan with trip reduction strategies to reduce single-occupancy vehicle trips to the Project site. The TDM plan would also encourage visitors to travel to the BCHD campus via active transportation – including biking – consistent with BCHD’s mission to promote health and well-being. There would be no significant transportation impact associated with bicycle use and no nexus with a physical environmental impact that would require the preparation of a Bicycle Usage Plan with the suggested requirements such as the suggested “*one-time fixed fee contribution to be deposited into the Bicycle Plan Trust Funds of the cities of Redondo Beach and Torrance.*”

Comment TRAO-62

The comment states that the construction work site traffic control plan must ensure that access will remain unobstructed for land uses in proximity to the project site and that coordination with the cities and emergency service providers is required to ensure adequate access. Both of these suggestions are already incorporated in MM T-2, which requires extensive notification and coordination with affected agencies and all owners and residential and commercial tenants of

property within a radius of 500 feet prior to construction activities associated with Phase 1 and Phase 2 of the proposed Project.

Comment TRAO-63

The comment states that the analysis of the impact on public transit is incomplete. However, a complete analysis of the potential impacts to transit services as a result of the proposed Project is provided in the EIR. For example, as described in Section 3.14, *Transportation* and Appendix K, describe that the utility of transit service and its attractiveness to non-transit dependent users is affected by frequency of service or “headways,” with ideal peak hour service providing headways of 15 minutes or better – a measure that Beach Cities Transit Line 102 does not meet. The nearest regional transit services with shorter headways and direct service to major destinations are located more than the 0.5-mile distance that transit riders might reasonably be expected to walk to/from the BCHD campus. Given existing transit conditions and the lack of planned transit improvements within the vicinity of the Project site, transit is unlikely to provide a viable transportation alternative to driving alone for the proposed Project. As such, even with the incentives provided in the TDM plan, which would improve public transit use, the implementation of the proposed Project would not result in overcrowding or additional waits for transit that would degrade transit operations.

Comment TRAO-64

The comment incorrectly suggests that the funds/revenue from the proposed RCFE Building would be used for implementing transportation improvements. Neither BCHD nor the EIR have stated that the funding for the mitigation measures identified in Section 3.14, *Transportation* is contingent on the revenues generated by the proposed RCFE Building.

Comment TRAO-65

The comment claims that little coordination with the City of Torrance was conducted regarding the transportation analysis. However, in contrast to this assertion, BCHD and its consultants performed extensive consultation with the City of Torrance. As described in the EIR, the scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. Both BCHD and Fehr & Peers also closely followed the City of Torrance’s public hearings regarding the potential future changes to Flagler Lane, all of which allowed for proper

disclosure of this potential issue in Section 3.10, *Land Use and Planning* and Section 3.14, *Transportation* as a potential conflict with the proposed access along Flagler Lane.

Comment TRAO-66

The comment restates that the EIR must correct all alleged traffic mitigation deficiencies. However, the EIR already requires comprehensive mitigation measures that address construction-related and operational transportation impacts. As explained in the responses to Comments TRAO-40 through TRAO-65, the perceived requirement to revise or add additional mitigation measures is unfounded given the conclusions of the impact analysis presented in Section 3.14, *Transportation*, which is based on substantial evidence.

Comment TRAO-67

This comment presents a list of issues related to the GHG and climate change analysis. However, the EIR provides extensive analysis of GHG emissions and other issues related to climate change as addressed in detail in the responses to Comments TRAO-68 through TRAO-80. Refer to Master Response 10 – Noise Analysis for detailed discussion and a response to comments pertaining to the quantitative GHG emissions modeling, assumptions, and results.

Comment TRAO-68

The comment states that we all have a responsibility to be proactive in reducing the generation of GHG emissions. The comment also cites *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504, statements from President Biden, and assessments from the Energy Innovations and Climate Center. The EIR provides extensive analysis of GHG and climate change related issues; the relevance of these citations to the proposed Project and the GHG and climate change analysis in the EIR is unclear and not stated by the commenter.

Comment TRAO-69

This comment claims that the BCHD shows a lack of leadership in regard to reducing GHG emissions and a lack of empathy with the communities it is supposed to serve. However, these comments are without basis as the EIR provides detailed analysis of GHG emissions and as discussed below, the proposed Project includes multiple elements designed to reduce GHG emissions. As described in Section 2.5.1.5, *Sustainability Features*, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed RCFE Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and

natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

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

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

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

The proposed new buildings would also be WELL Building Certified. The WELL Building Standard is the premier standard for buildings, interior spaces and communities seeking to implement, validate and measure features that support and advance human health and wellness. WELL was developed by integrating scientific and medical research and literature on

environmental health, behavioral factors, health outcomes and demographic risk factors that affect health with leading practices in building design, construction, and management.

The proposed Project also complies with Connect SoCal, the Redondo Beach and Torrance General Plans and Climate Action Plans, the RBMC, the TMC, Assembly Bill (AB) 32, and SB 32, and thus would ensure that the GHG emissions associated with the proposed Project would conform with State and local requirements (refer to Tables 3.7-8 through 3.7-10). Accordingly, the EIR concludes that the proposed Project would have less than significant impacts associated with GHG emissions.

Comment TRAO-70

The comment incorrectly claims that BCHD does not adequately address CEQA requirements for the reduction of BCHD emissions. The comment selectively quotes the discussion of the SCAQMD’s adoption of a 10,000 MT CO₂e per year as a screening level threshold of significance for a stationary source industrial project, for which SCAQMD is the lead agency. This is a misapplication of the SCAQMD’s threshold, however, because it is a “*threshold for a stationary source industrial project, for which SCAQMD is the lead agency.*” The proposed Project is clearly not a stationary source industrial project. The comment also does not acknowledge the net change in GHG emissions accounting for the demolition of the Beach Cities Health Center. As described in Table 3.7-7, the proposed Project would result in a reduction of 741.7 MT CO₂e per year, and would therefore result in a minor beneficial impact with regard to GHG emissions. Therefore, and there is no need for the suggested mitigation measures, The GHG and climate change analysis in the EIR is supported by substantial evidence.

Comment TRAO-71

As in Comment TRAO-69, the commenter alleges that BCHD does not take a proactive approach to addressing GHG emissions. However, this comment ignores the multiple measures included in the proposed Project to improve sustainability and reduce GHG emissions. Refer to the response to Comment TRAO-69 for a list of sustainability features that have been voluntarily incorporated into the proposed Project, and which include the provision of EV spaces, bicycle facilities, and solar panels as requested in the comment. The comment also incorrectly states that there is no analysis of electricity and natural gas demand associated with the proposed Project. A complete analysis of energy usage is provided in Section 3.5, *Energy*.

Comment TRAO-72

The comment states that the GHG mitigation measures are poorly analyzed. As explained in the response to Comment TRAO-70, the implementation of the proposed Project would result in a net decrease in GHG emissions. Additional mitigation and associated analysis is not required to address any significant environmental impacts. As described in the 3.7.3, *Impact Assessment and Methodology*, that the operational emissions presented in Table 3.7-5 and Table 3.7-6 provide a conservative estimate of the actual GHG emissions, considering the fact that the quantitative modeling provided in the EIR does not account for some of the sustainability and energy efficiency measures included as part of the proposed Project (e.g., photovoltaic solar panels, energy efficient HVAC systems, high-performance building envelope usage to maximize insulation, lighting systems designed with occupancy sensors and dimmers to minimize energy use, etc.) and, therefore, conservatively overstates the proposed Project's GHG emissions.

Comment TRAO-73

The comment incorrectly states that by calculating the net GHG emissions associated with the proposed Project, BCHD is not going to do anything with regards to fuels and electricity. Refer to the response to Comment TRAO-69 for the extensive list of sustainability features and GHG reduction measures that have been voluntarily incorporated into the proposed Project.

Comment TRAO-74

This comment states that the EIR incorrectly considers baseline conditions in calculating GHG emissions associated with the proposed Project. However, the comment fails to acknowledge that compliance with CEQA requires comparing the proposed Project to existing conditions in order to determine the potential impacts associated with the proposed Project. This applies to potential impacts due to GHG emissions as well as criteria air pollutant emissions. It is incorrect to suggest that the redevelopment of an existing site with a more energy efficient use would not result in a reduction in operational GHG emissions. Taken to its logical conclusion, the methodology suggested by the commenter would mean that only a development that would have no new GHG emissions (e.g., open space) would result in GHG reductions. This is clearly not the interpretation of CARB, SCAQMD, or other relevant agencies responsible for regulating GHG emissions.

Comment TRAO-76

The commenter questions why the BCHD Bike Path Project is not considered to be a part of the proposed Project, and suggests that the GHG analysis should address the relationship of bicycle facilities and GHG emissions. The BCHD Bike Path Project is a separate project given that it will

be grant-funded, is on a separate and distinct timeline, and can be implemented with or without the proposed Healthy Living Campus Master Plan. Accordingly, the BCHD Bike Path Project is included and addressed in the cumulative impact analysis. As described in Section 2.5.1.5, *Sustainability Features* the proposed Project would include sustainable transportation infrastructure, such as bicycle parking as well as employee shower and locker facilities. Given the net reduction in GHG emissions associated with the proposed Project, the need for additional mitigation measures (e.g., extending bicycle lanes) is unnecessary to reduce GHG emissions to a level that is less than significant.

Comment TRAO-77

The comment contends that potential use of the open space included in the proposed Health Living Campus Master Plan to support outdoor farmers' markets should be removed from the policy consistency analysis. However, BCHD as the proponent and lead agency has determined that this use should be included. Section 2.5.1.1, *Proposed Uses* specifically proposes the use of the outdoor space to support outdoor farmers' markets and health fair expositions. As such, its inclusion in this policy consistency analysis is appropriate and will remain in the Final EIR. The proposal for a farmers' market is neither contingent on a perceived need nor the previous use of a vacant lot for a similar use. This comment does not address the adequacy to the EIR or the impact analysis and represents the commenter's opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Project.

Comment TRAO-78

The comment incorrectly claims that the trip generation rates for the proposed Aquatic Center in Phase 2 were not completed by Fehr & Peers, and that the analysis uses preliminary findings. However, this statement is inaccurate and does not reflect either the analysis in the EIR or transportation study. As described in Section 3.14.3, *Impact Assessment and Methodology*, while the *Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition* does describe trip generation estimates for gyms and fitness centers, it does not include trip generation estimates that are specific to aquatic centers. Therefore, Fehr & Peers used the results of the market feasibility analysis prepared by Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies, to estimate potential trip generation. Critical factors that were considered in developing the trip generation rates for the proposed Aquatic Center in Phase 2 included the populations of the Beach Cities; the proportions of frequent, infrequent, and occasional swimmers; and the estimated market capture based on the size of the facility and the type of pool(s) that it would provide. The use of this market study by Fehr & Peers to develop trip generation rates for the proposed Aquatics Center in Phase 2 is entirely in keeping

with ITE's recommendation to use local data when it is available. The methodology for the development of trip generation rates is described in detail in the Vehicle Miles Traveled Study (see Appendix K). The trip generation methodology is provided as Appendix A of the study, and the Ballard*King & Associates Market Feasibility Evaluation is provided as Appendix C of the study.

Comment TRAO-79

The comment states that the South Bay Aquatics Center was not used to develop aquatic center trip generation estimates because it had not been operating with regular class schedules due to the COVID-19 pandemic. This statement is correct, which led to the use of the market feasibility analysis prepared by Ballard*King & Associates to prepare the trip generation estimates (refer to the response to Comment TRAO-78).

It should be noted that while the comment attributes these statements in Appendix J to Ballard*King & Associates, the trip generation methodology presented in Appendix K and Appendix J was prepared by Fehr & Peers.

Comment TRAO-80

The comment states that Ballard*King & Associates was directed to use the National Sporting Goods Association (NGSA) to approximate the number of people who might participate in recreational activities. First, it is important to note that the methodology employed by Ballard*King & Associates was not directed by BCHD or Fehr & Peers. The use of the NGSA participation statistics is commonplace for determining the market for recreation activities. NGSA has more than 35 years of experience providing such data, which can be used to “...to make educated decisions about participants, including market size and composition.”

Ballard*King & Associates took the national average and combined that with participation percentages of the Primary Service Area based upon age distribution (15.8 percent), median income (16.7 percent), region (17.9 percent), and national number (16.6 percent). As acknowledged in the comment, those percentages were then averaged to create a unique participation percentage for the Primary Service Area (16.6 percent). This participation percentage, when applied to the population of the Primary Service Area, provided an estimate of the market potential for the proposed Aquatic Center. A Market Capture Rate of 3 percent was applied given the size limitations and operational budget of the facility. This Market Capture Rate was supported by Ballard*King & Associates' previous work in the area, work across the country, and the presence of other providers. Similar market feasibility analyses have been prepared for sports facilities across California and across the Country.

The complete Aquatics Report, which is publicly available here: <https://bchdcampus.org/sites/default/files/archive-files/Aquatics%20Report.pdf>, thoroughly describes the applicability and use of the NSGA participation statistics in combination with local demographic data. With regard to the local data sets requested by the comment, it should be noted that the Aquatics Report includes a robust local survey involving 2,256 responses that focused on the types of aquatic programs in which the respondents were interested. This survey data contributed to and substantiated the use of the NSGA participation statistics and local demographic data.

It should also be noted that Fehr & Peers prepared trip generation estimates by building on the results of the market feasibility study. Fehr & Peers assigned vehicle occupancy factors (e.g., 1 person per vehicle for frequent swimmers as compared to 3 persons per vehicle for occasional swimmers that are likely to include families). Fehr & Peers also considered anticipated programming for the proposed Aquatics Center (e.g., hydrotherapy) to identify shared uses related to the Center for Health and Fitness (CHF) and the proposed Assisted Living program. Together these were used to develop trip generation estimates specific to the proposed Project.

The Vehicle Miles Traveled Study is clear that these are trip generation estimates. Further, as described in the response to Comment TRAO-65, the scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. The trip generation estimates for all uses associated with the proposed Project are consistent with ITE recommendations and each of the cities guidelines for preparing transportation studies. This clearly meets the requirement of CEQA Guidelines Section 15003(i), which states “*CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure.*”

Therefore, the trip generation estimates for the proposed Aquatics Center were appropriate for estimating mobile source GHG emissions associated with the facility.

Comment TRAO-81

The comment requests that a Hazardous Waste Disposal Plan be prepared and implemented by a Hazardous Waste Disposal Compliance Monitor. The comment goes on to list numerous measures to be included in or required by the plan. However, the analysis in the EIR does not support the need for these suggested measures, is not supported by substantial evidence or expert opinion and

do not reflect the clear recommendations provided in the EIR – particular because neither the City of Redondo Beach, the City of Torrance, nor any the environmental regulatory agency commented on the mitigation measures that were identified in Section 3.8, *Hazards and Hazardous Materials*. The commenter does not explain why the suggested measures would be more appropriate than MM HAZ-1, which would require asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mold surveys, and MM HAZ-2a through HAZ-2d, which would require the preparation of a soils management plan, soil vapor monitoring, the use of soil vapor extraction equipment, and the procedures that would be followed in the event that previously unknown or unidentified soil or groundwater contamination is encountered. As stated in the EIR, compliance with these mitigation measure would involve review and approval by the Redondo Beach Building & Safety Division and the City of Torrance Building & Safety Division as well as other relevant agencies include the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and Los Angeles Regional Water Quality Control Board (RWQCB). Additionally, all surveys and disposal activities would be carried out by a licensed contractor(s). A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment TRAO-82

This comment provides a lengthy description of the pilot program that is being implemented by the City of Torrance to explore the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street. As described in the comment, if approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project.

The potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, is fully described and discussed in the EIR, as is demonstrated by the citations to the EIR provided in the comment. As discussed in the response to Comment TRAO-53, if the trial removal of the southbound vehicle movement along Flagler Lane is made permanent, it would conflict with and eliminate the use of the service access along Flagler Lane. This is one of the reasons that Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative each consider an alternative access and circulation scheme that eliminates the proposed vehicle access on Flagler Lane.

Contrary to the assertion that the possibility that the City of Torrance may make changes in vehicle travel on Flagler Lane makes the description of the proposed Health Living Campus Plan unstable,

this potential action by another agency is acknowledged in the EIR and supports the analysis of alternative access and circulation schemes for consideration by the public and the decision-makers.

Comment TRAO-83

The comment states that the EIR must identify the minority stakeholder rights of any development agreement, given the purposed risks inherent and the potential for diminishment and loss of assets. This is not a comment on the adequacy of the environmental impact analysis provided in the EIR. These financial issues do not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

Comment TRAO-84

This comment provides a lengthy summary of the design-build process and cites an article from the Golden Gate University Environmental Law Journal that appears to argue for the amendment of CEQA to: 1) make all design-build projects subject to a publication requirement for post-CEQA-approval design and construction changes; and 2) require an oversight and review committee to make recommendations for supplemental environmental review. This publication contains a legal argument that suggests the need for amendments to CEQA that have not been adopted by the Legislature. In addition, the examples provided in this publication are for high-speed rail projects – particularly the California High-Speed Rail Network, for which the California High Speed Rail Authority is responsible for regulating construction activities. Therefore, this comment is not germane to the adequacy of the EIR under CEQA as it is currently drafted.

The comment also fails to acknowledge the differences between the required approvals for the proposed Health Living Campus Master Plan and the State’s high-speed rail project. Unlike the design build process for the California High-Speed Rail Network, the proposed Health Living Campus Master Plan would be subject to approvals by responsible agencies include the City of Redondo Beach and potentially the City of Torrance (refer to Section 1.5, *Required Approvals*). Following the adoption of the proposed Project, BCHD would be required to obtain a CUP from the City of Redondo Beach, and final designs would be subject to Redondo Beach Planning Commission Design Review in compliance with the Community Facility (P-CF) zoning for the Project site as established in RBMC Section 10-2.1116 and TMC Section 13.9.7. Therefore, subsequent reviews and approvals would be required and, in compliance with CEQA Guidelines Section 15162, any substantial changes to the proposed Project would be evaluated to determine whether they would result in a new significant environmental effect or a substantial increase in the severity of a previously identified significant effect. If so, and depending to what extent, a Subsequent EIR (CEQA Guidelines Section 15162), a Supplemental EIR (CEQA Guidelines

Section 15163), or an Addendum (CEQA Guidelines Section 15164) to the previously prepared EIR may be required.

Comment TRAO-85

This comment asserts that BCHD has violated the Los Angeles Local Area Formation Commission (LAFCO) restrictions. This is not a comment on the adequacy of the environmental impact analysis provided in the EIR. However, it should be noted that the proposed Project does not propose to expand or otherwise change BCHD's sphere of influence. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue to use this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Comment TRAO-86

The comment asserts that the No Project Alternative must be clarified to describe whether it would result in demolition and replacement with open space or no redevelopment. For context, pursuant to CEQA Guidelines Section 15126.6(e)(1), “[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Pursuant to CEQA Guidelines Section 15126.6(e)(2), “[t]he ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing BCHD campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well

as relocation and substantial reductions in BCHD program offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is “*reasonably expected to occur in the foreseeable future*” clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District and substantially reducing public health service available to Beach Cities residents and even those of the South Bay. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing BCHD campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant Flagler Lot for redevelopment that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion of the Project site. This one-

time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

Comment TRAO-87

This comment states that the No Project Alternative should evaluate reduced services. However, as described in the response to Comment TROA-86, the potential reduction in services is already adequately described for CEQA purposes. As described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings.

However, given the continued escalation of maintenance costs that are beginning to outpace revenue, it would be neither reasonably foreseeable nor responsible for BCHD as a public agency with fiduciary obligations to taxpayers to continue operating the BCHD campus until financial insolvency.

Comment TRAO-88

The comment suggests additional alternatives, which are addressed in detail in the responses to Comments TRAO-89 through TRAO-97.

Comment TRAO-89

This comment claims that almost all BCHD objectives do not have merit. However, this comment represents the commenter's opinion and does not reflect the extensive deliberations that BCHD has engaged in regarding the project objectives and the substantial technical and financial analysis that have informed these deliberations. Refer to the response to comment TRAO-6 regarding the purpose and need for the seismic retrofit.

The comment states that BCHD should consider a seismic retrofit, if and when it is needed. However, the comment fails to acknowledge the relationship of the required maintenance activities to the seismic issues as well as the fact that the No Project Alternative does not propose immediate demolition. The No Project Alternative describes that BCHD would continue to operate the Beach Cities Health Center and the Beach Cities Advanced Imaging Building until it becomes financially infeasible to do so. As described in the response to Comment TRAO-86, during this time BCHD would continue to monitor the structural stability of these buildings. As described under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund

seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, only then BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center.

Comment TRAO-90

The comment claims that the project objectives related to revenue generation have been included for BCHD to stay in business. As described in detail in the EIR, revenue generated by the proposed Healthy Living Master Plan would permit BCHD to continue to provide high-quality community health and wellness service to tens of thousands of residents in the Beach Cities and even the greater South Bay. Financial insolvency of BCHD would deprive residents of these services. As discussed in the response to Comment TRAO-10, the project objectives acknowledge that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs. A quantitative analysis of BCHD's services can be found in the Community Health Report (<https://www.bchd.org/healthreport>) as well as the Priority-Based Annual Budgets (<https://www.bchd.org/operating-budgets>).

Comment TRAO-91

The comment claims, without support of expert opinion or technical studies and in conflict with substantial evidence in the record, that the need for assisted living with on-site facilities is not growing. Refer to the response to Comment TRAO-13 as well as Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. Additionally, as described in Master Response 6 – Financial Feasibility/Assurance, BCHD

retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study.

Comment TRAO-92

The comment claims that the only two objectives that resonate with community desires include creating public open space and reducing expenses. However, the comment reflects the commenter's opinion and does not reflect the existing demand for BCHD programs and services. Further the comment conflates parkland and open space when it asserts that the open space described for the proposed Healthy Living Campus Master Plan violates the RBMC. The comment appears to imply that a zoning change to P-PRO would be required. The project objective identified in the comment clearly describes open space, which is a use that is consistent with the land use designation and zoning (P-CF) of the existing BCHD campus which permit recreational facilities and open space and accessory use/structures (e.g., storage shed, maintenance building, concession stands, etc.) pursuant to RBMC Section 10-2.1110. The comment also states that the proposed Healthy Living Campus Master Plan would violate the RBMC with regard to building density, height, and number of stories. This comment is incorrect because the design of the proposed Project is consistent with the requirements for P-CF and C-2 zoning and land use designations.

As described in the response to Comment TRAO-14, open space on the BCHD campus would be publicly accessible and would not be privately owned. With regard to community events within the publicly accessible open space, all applicable permits would be obtained from the City of Redondo Beach, as necessary. Consistent with MM NOI-3b, an Events Management Plan would be prepared and implemented to ensure consistency with the Redondo Beach and Torrance noise ordinances.

Comment TRAO-93

The comment asserts that the CHF and Adventureplex are self-sustaining and therefore self-sufficient and demonstrate the satisfaction of a public need. This is not a comment on the adequacy of the environmental analysis provided in the EIR. Refer to the responses to Comment TRAO-10 and TRAO-12 regarding the project objectives described for the proposed Healthy Living Campus Master Plan.

Comment TRAO-94

The comment asserts that as the use of the lease space within the Beach Cities Health Center declines over time the parking requirement at the BCHD campus would also decline, allowing for the development of parkland. While parkland is clearly valuable, this comment ignores BCHD's central mission which is provision of community health and wellness services which is dependent upon revenue from the BCHD campus, BCHD's primary asset. The comment lists alleged expenses for BCHD to operate as a reduced organization, but does not provide a citation for these figures. In addition, the comments fails to acknowledge that BCHD would still be responsible for maintaining the Beach Cities Health Center and its remaining occupants. While the comment suggests that large portions of the building be mothballed, it fails to acknowledge that the building's utilities are not confined to certain portions or wings of the building. For example, water lines, electrical lines, natural gas lines, structural components of the building, etc. would all still require maintenance throughout the building to ensure that the lease spaces in other portions of the building are in good working order. This comment also fails to acknowledge the seismic stability issues associated with the building, which contributes to the underlying need to redevelop, rather than renovate, the Beach Cities Health Center. As described for Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) and Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus, BCHD would not continue operating the campus until financial insolvency caused by increasing maintenance costs and reduced revenues.

Lastly, with regard to the development of parkland, BCHD is a California Healthcare District with a focus on health and wellness programs and services. Accordingly, the project objective related to open space is specifically to provide sufficient public open space to accommodate programs that meet community health needs. Although BCHD provides some health-related recreational services (e.g., fitness classes), it is not primarily a recreational service provider and the construction of parkland consistent with RBMC Section 10-2.1117 neither falls within the mission of BCHD nor meets the identified project objectives.

Comment TRAO-95

The comment provides a lengthy discussion suggesting that the EIR consider an alternative that would reduce expenses. First it is important to reiterate that CEQA requires that the environmental impact analysis “...*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “*significant effect on the environment*” as “...*a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.*”

Accordingly, the EIR analyzes the potentially significant physical adverse environmental effects of the proposed Project (CEQA Guidelines Section 15358[b]). The comment appears to relate primarily to the financial operation of BCHD, however, and suggests the elimination of funds and grants, reductions in salaries, reduction in programming, increases in fees for services, etc.

Pursuant to CEQA Guidelines Section 15126.6(e)(2), the EIR examines Alternative 1 – No Project Alternative (Demolish and Replacement with Open Space). This alternative describes the “*what would be reasonably expected to occur in the foreseeable future*” if the proposed Project were not implemented. Thus, the description of the No Project Alternative explains that BCHD that would continue Community Services, CHF, Beach Cities Silverado Memory Care Community, and other tenant operations (e.g., outpatient medical office) within the Beach Cities Health Center. Additionally, tenant operations (e.g., outpatient medical office) would continue within the Beach Cities Advanced Imaging Building and the Providence Little Company of Mary Medical Institute Building. BCHD would continue to provide building maintenance as required (refer to the response to Comment TRAO-94). However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings.

Accordingly, the alternative addresses the strategies that are called for in the comment; however, the comment does not acknowledge that there would eventually be a critical point at which maintenance costs could not be sustained, regardless of the cuts to services, with associated potential adverse effects on public health and wellness for BCHD’s service population. At that point, under the No Project Alternative, BCHD would either require a local bond to facilitate improvements or would be required to consider sale of the BCHD campus or eventual demolition due to the deferred maintenance and seismic safety hazards.

Comment TRAO-96

The comment cites CEQA Guidelines Section 15126.6(a) and states that alternative locations should be considered. The comment goes on to claim that the EIR presents excuses for why the land west of the AES Redondo Power Plant was dismissed from further consideration. However, the discussion in the EIR provides clear discussion of the barriers of completing the Project on alternative sites and meets the requirements of CEQA Guidelines Section 15126.6(f), which states that “[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the

project.” Specifically, CEQA Guidelines Section 15126.6(f)(2)(B) requires that “[i]f the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.” As an example, the discussion explains that the AES Redondo Beach Power Plant site is large enough, but is zoned as P-GP and would not allow for medical office and health-related facilities, or residential care facilities. BCHD could apply for a zoning change, but pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. For example, AES Redondo Beach LLC finalized the sale of the power plant site to a private developer in March 2020. The new owner of the site is currently considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. As described in CEQA Guidelines Section 15126.6(f)(3), “[a]n EIR need not consider an alternative...whose implementation is remote and speculative.”

Comment TRAO-97

The comment states that BCHD should consider the use of a ballot bond measure for seismic retrofit funding. Refer to the response to Comment TRAO-94, which discusses potential actions that would be taken under the No Project Alternative.

Comment TRAO-98

The comment raises general issues about the assessment of cumulative impacts, which are already addressed in detail throughout the EIR and in the responses to Comments TRAO-99 through TRAO-106.

Comment TRAO-99

The comment states that the EIR omits the BCHD Bike Pathway Project and the redevelopment of the AES Redondo Beach Power Plant as cumulative projects.

With regard to the BCHD Bike Pathway Project, it is not listed in the Table 3.0-1 because it is not a planned, pending, or approved Project by the City of Redondo Beach. Given BCHD’s involvement in the design of the BCHD Bike Pathway Project, it is acknowledged in the EIR, where appropriate. For example, Section 3.14.1, Environmental Setting states that, separately from the proposed Project, BCHD is currently working with the City of Redondo Beach and the City of Torrance to plan a new protected (i.e., Class I) bicycle facility (BCHD Bike Path Project) along the eastern perimeter of the BCHD campus along Flagler Lane and Flagler Alley between the

northern terminus of Flagler Alley and Beryl Street. The EIR also includes a discussion of the BCHD Bike Path Project in the cumulative impacts discussion in Section 3.14, Transportation, which explains that the BCHD Bike Path Project (separate from the proposed Project) would develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street. The expansion of the regional bikeway network in the cities of Redondo Beach, Torrance, and Hermosa Beach would achieve the overall goal of the South Bay Bicycle Master Plan and would align with BCHD's mission to promote health and well-being. The proposed Project would not preclude the development of the BCHD Bike Path Project or otherwise result in a substantial contribution to cumulatively considerable impacts related to transportation plans and policies. Refer to the response to Comment TRAO-76.

The AES Redondo Beach Power Plant is still in operation through 2021. As described in the response to Comment TRAO-96, AES Redondo Beach LLC finalized the sale of the site to a private developer in March 2020; however, the new owner of the site is still considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. Potential redevelopment concepts at this site are currently unknown and it would be speculative to discuss further. The potential redevelopment of the AES Redondo Beach Power Plant is accordingly not a planned, pending, or approved Project by the City of Redondo.

Comment TRAO-100

The comment incorrectly claims that the BCHD Bike Path Project is a part of the proposed Health Living Campus Master Plan. As described in the response to Comment TRAO-76, the BCHD Bike Path Project is described as separate project given that it is grant-funded, on a separate and distinct timeline, and can be implemented with or without the proposed Healthy Living Campus Master Plan. The BCHD Bike Path Project was originally described as a part of the proposed Healthy Living Campus Master Plan because the two projects were on concurrent schedules; however, due to grant funding requirements and delays in planning for the Health Living Campus Master Plan, these schedules were decoupled. Implementation of the BCHD Bike Path Project does not depend on approval of the Healthy Living Campus Master Plan, or vice versa; therefore, analyzing the BCHD Bike Path Project in the cumulative impacts analysis, as discussed below, does not constitute piecemealing.

The cumulative impact discussion considers the potential for cumulative safety impacts related to the BCHD Bike Path Project. Specifically, the analysis describes that implementation of the Class II bicycle lane along Flagler Alley and segments of Flagler Lane and Diamond Street would be designed in consideration of the proposed Project design features to protect pedestrians and

bicyclists along the Class II bicycle lanes as they cross Towers Street. Further, as with the proposed Project, each of the cumulative projects would be subject to site plan review and would meet local street design and access requirements. Therefore, implementation of the proposed Project would not result in a substantial contribution to cumulatively considerable impacts related to design features.

Comment TRAO-101

The comment states the EIR must describe the cumulative impacts of the proposed Project and the Redondo Beach Police Department Shooting Range Upgrade on Towers Elementary School. The Police Department Shooting Range is identified as a cumulative project (refer to Table 3.0-1). This cumulative project is specifically referenced in the cumulative aesthetics and the cumulative hazards and hazardous materials analyses given the proximity of the site to the BCHD campus. As described in the cumulative impact analysis within Section 3.11, *Noise*, the proposed campus would be required to comply with the Redondo Beach and Torrance noise regulations and would not result in a potentially significant impact due to operational noise. Neither publicly available designs nor CEQA documentation for the Police Department Shooting Range were available at the time of the preparation of the EIR. Therefore, a quantitative noise analysis for the proposed shooting range was not available. Nevertheless, given that the proposed Project would comply with the requirements of the City of Redondo Beach and the City of Torrance noise ordinances, including all maximum permissible sound level requirements by land use type, the proposed Project would not substantially contribute to a cumulatively considerable noise impact.

Comment TRAO-102

The comment incorrectly claims that the EIR does not address the extent to which implementation of the proposed Project could have a cumulative effect on public services in the context of SCAG's regional growth forecasts. First, as discussed for the proposed Project, the incremental increases in demand for public services would almost entirely be limited to public services provided by the City of Redondo Beach. Second, the cumulative impact discussion clearly describes the magnitude of the contribution. For example, the analysis of cumulative impacts for fire protection services describes the number of cumulative housing projects that are planned pending or approved in the City of Redondo Beach, calculates the potential residential population increase associated with those housing projects, and provides this as context to describe the magnitude of the potential contribution of the proposed Project to a cumulative impacts on Emergency Medical Service (EMS) response. The assertion that the proposed Project would substantially contribute to a cumulative impact on public services provided throughout the six counties making up the SCAG is unfounded. As described in Section 3.13, *Public Services* the magnitude of the potential

contribution to cumulative impacts is described for each of the public services analyzed in the EIR would be minor, or even negligible.

Comment TRAO-103

The comment asserts that the redevelopment of the AES Redondo Beach Power Plant should be evaluated as a cumulative project. Refer to the response to Comment TRAO-99 for a detailed discussion and response to comments pertaining to this issue.

Comment TRAO-104

This comment claims that the analysis fails to assess the cumulative impacts of the proposed Project on the Redondo Beach Historical Museum and the Morrell House, which are located in Dominguez Park. However, the comment is inaccurate and the EIR does address such potential cumulative impacts in Section 3.4, *Cultural Resources*. This analysis appropriately describes both of these buildings, which have been previously determined to be Redondo Beach Landmarks in accordance with the criteria described in the Redondo Beach Historic Ordinance (Ord. No. 2554). Potential impacts to historic built resources can include physical damage or the loss of character defining features and alteration of the historic setting. As described in Section 3.11, *Noise*, redevelopment of the BCHD campus would not result in substantial ground-borne vibration that could physically damage either of the two nearby historic buildings (refer to Section 3.11, *Noise*). With regard to their historic setting, both the Morell House and Queen Anne House were relocated to their current location in Dominguez Park in the late 1980s. As such, these buildings were previously removed from their original historic settings and context. Also, the area surrounding the current location of Morell House and Queen Anne House has been substantially redeveloped over the years with the construction former South Bay Hospital, Redondo Village Shopping Center, and other surrounding uses including Dominguez Park, which was formerly a landfill that was operated from 1904 to 1967. The existing surrounding development, including the Project site, does not contribute to the character-defining features that establish of the Morell House and Queen Anne House as Redondo Beach Landmarks; therefore, no impact and the Project would occur.

Comment TRAO-105

The comment notes minor inconsistencies in distances measured between the Project site and the location of nearby cumulative projects. These discrepancies are small errors in estimation. For example, the comment states that Section 3.11, *Noise* describes the Morrell House and Queen Anne house at a distance of 600 feet, while Section 3.4, *Cultural Resources* describes these properties at a distance of 650 feet and 750 feet respectively. These minor discrepancies have no material effect on the description of potential cumulative impacts, which are discussed in the

response to Comment TRAO-104, and the text will be revised in the Final EIR to make this correction. The commenter also asserts that the EIR describes the former Redondo Beach Police Department shooting range as being located 1 mile from the Project site, but this misstates the Section 3.8, *Hazards and Hazardous Materials*, which clearly describes the Redondo Beach Police Department shooting range as an off-site property located “*within*” 1 mile of the Project site (i.e., the search radius for potentially hazardous sites).

Comment TRAO-106

The comment asserts that the proposed Aquatics Center has not been identified in the project objectives. However, this component of the proposed Project does not need to be further enumerated in the project objectives. Refer to CEQA Guidelines Section 15124(b), which states that the project objectives “...*should include the underlying purpose of the project.*” Moreover, the proposed Aquatic Center help attain a number of the project objectives. For example, it is a facility that is “...*designed to meet the future health needs of residents.*” For a detailed discussion regarding the Los Angeles Local Area Formation Commission Restrictions refer to the response to Comment TRAO-85.

Comment TRAO-107

The comment suggests that the EIR does not assess the potential impacts of a swimming pool on EMS services and cites potential permanent injuries due to drowning, ingestion of toxic chemical, and increases in water-borne illnesses. However, operation of public pools are subject to clear and strict state regulations with regards to public safety. Additionally, Section 3.13, *Public Services* acknowledges that operation of the proposed BCHD Healthy Living Campus would result in an increase in residents, employees, and visitors at the BCHD campus, and could result in incremental increases in Redondo Beach Fire Department (RBFD) responses. The analysis calculates the projected number of EMS responses for the proposed Assisted Living program and Memory Care community residents because specific data was available from the Silverado Beach Cities Memory Care Community. The analysis more generally describes potential demand associated with employees and visitors, and notes that they would not measurably affect the ratio of firefighters to residents or adversely impact response times. The RBFD has the existing required assets to respond to emergencies at the existing Beach Cities Health Center. The proposed Project would redevelop the existing BCHD campus, which is in close proximity (<1.2 miles) to RBFD’s three Fire Stations. Because response times to the existing campus are satisfactory and the proposed Project would only incrementally increase the demand for RBFD services, the proposed Project would continue to be located well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the RBFD and would not require new or physically altered RBFD facilities.

With regard to the assertions that the proposed Aquatics Center would lead to water-borne illnesses, these suggestions are highly speculative, and ignore the fact that public pools exist throughout the South Bay and are subject to clear and strict state regulations with regards to public safety. The proposed Aquatics Center would be governed by all applicable rules and regulations, and would be subject to City health inspections.

With regard to the commenter's assertion that the EIR does not analyze construction impacts associated with the proposed Aquatics Center, the comment ignores that EIR's extensive discussion of construction-related activities and impacts. Construction-related activities associated with Phase 2 are described in Section 2.5.1.6, *Construction Activities*. The proposed construction of this facility is clearly included in each of the construction-related impact discussions, including the quantitative analysis of impacts described in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*.

Comment TRAO-108

This comment asserts that the implementation of the proposed Healthy Living Campus Master Plan will fail financially and that BCHD does not have the management experience needed. As noted in multiple responses to comments above, the financial viability of the proposed Project has been subject to multiple technical reports and open public discussion by the BCHD Board of Directors; further, finances and economics are not the focus of CEQA and CEQA Guidelines Section 15131 prohibits analysis of economic issues. For a detailed discussion and response to comments on such issues refer to Master Response 6 – Financial Feasibility/Assurances. This comment does not relate to the focus of the review of EIRs in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Although these comments do not address the adequacy of the EIR, as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment TRAO-109

This comment claims that the true purpose of the proposed Health Living Campus Master Plan is not disclosed in the EIR and suggests that the intent of the proposed Project is to generate revenue. Refer to the responses to Comments TRAO-6 through TRAO-10, which address issues related to the project objectives. Refer also to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives. As stated in these other responses, the project objectives make

plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. Accordingly, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the implementation of the proposed Healthy Living Campus Master Plan.

Comment TRAO-110

The comment claims that the EIR overstates the need for the proposed Assisted Living program. For a detailed discussion and response to comments refer to the response to Comment TRAO-13 and Master Response 3 – Project Need and Benefit. As described in the response to Comment TRAO-13, BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. Field work and analysis were originally completed in April 2016 and updated in August 2018 and May 2019 to reflect the changed number of proposed housing units. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 updated market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards and if the conclusions and demand estimates were reasonable. Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. The assertion that there is not a demand for Assisted Living in the Beach Cities is unfounded. It should be noted that the proposed Project would also provide a PACE program. As described in Section 2.5.1.1, *Proposed Uses*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services older adults (i.e., age 55 and older with an average age of 76). PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing

services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. For most participants, PACE services would enable them to remain in the community rather than receive care in a nursing home or other elder care facility.

Comment TRAO-111

The comment states that EIR does not provide an analysis of real estate value depressions. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, CEQA requires that the environmental impact analysis “*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15131, cited in the comment, specifically states that “[*e*]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.” CEQA Guidelines Section 15131(b) gives the example of “[*c*]onstruction of a road and the resulting increase in noise in an Area [*that*] disturbed existing religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment.” Potential loss of property value in and of itself is a not physical impact required to be evaluated in a CEQA environmental review document. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

The EIR does not identify significant impacts related to visual character or shade and shadows (refer to Impact VIS-4 in Section 3.1, *Aesthetics and Visual Resources*). While the EIR does identify significant and unavoidable construction-related noise impacts, these temporary, but prolonged impacts would only affect on-site sensitive receptors and sensitive receptors immediate adjacent to the BCHD campus. The proposed Project would not have a significant and unavoidable impact on Towers Elementary School or Beryl Heights Elementary School as the comment suggests (refer to Table 3.11-16 and Table 3.11-17 in Section 3.11, *Noise*).

Comment TRAO-112

The comment asserts that the EIR does not discuss the environmental impact of construction contract failure. However, the EIR provides detailed discussion of construction-related activities and impacts and the financial viability of the proposed Project has been analyzed in multiple studies and discussed in open public meetings. For a detailed discussion and response to comments pertaining to the financial viability of the proposed Project refer to Master Response 6 – Financial Feasibility/Assurance. These issues are not directly associated with the physical impacts on the environment. Further, concerns that BCHD would be unable to fund the proposed Project, that the proposed Project would fail financially, or that that foreclosure of the property and inability to complete the proposed Project following initiation of construction activities would result in environmental damages and loss of public land are unsubstantiated and speculative. CEQA Guidelines Section 15384[a] states that “[s]ubstantial evidence does not include ‘argument, speculation, unsubstantiated opinion or native, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are caused by physical impacts on the environment.’”

The EIR does evaluate a No Project Alternative, however, which would result in the eventual demolition of the Beach Cities Health Center as well as an alternative that considers closure, sale, and redevelopment of the BCHD campus. The assertion that a partially developed project would exist into perpetuity resulting in damage to aesthetics, accidents and injuries, occupation by homeless individuals or criminals, or the promotion of illegal activities is highly speculative and unreasonable.

Comment TRAO-113

This comment references CEQA Guidelines Section 15064.3, which states that “[a]ny assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.” The comment then goes on to describe that TDM strategies must consider impacts on sensitive individuals and requests a discussion of potential impacts of temporary, but prolonged construction-related traffic. However, as discussed in further below, the EIR and supporting technical analyses provide detailed descriptions of these issues.

In accordance with CEQA Guidelines Section 15064.3, the assumptions used to estimate VMT are described in Section 3.14, *Transportation* as well as in Appendix K. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019

and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis.

With regard to TDM strategies, it is important to note that the EIR did not identify a potentially significant impact to VMT. A TDM plan is included as a recommended mitigation measure that provides additional information on the proposed TDM measures pursuant to the requirements of RBMC Section 10-2.2406. The implementation of this recommended mitigation measure would further reduce an already less than significant impact. The TDM plan would encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being (refer to the response to Comment TRAO-45).

Temporary, but prolonged construction-related transportation impacts, including potential associated safety impacts are thoroughly discussed under Impact T-3 in Section 3.14, *Transportation*. Implementation of MM T-2 would require the preparation of a Construction Traffic and Access Management Plan, which would require review and approval, in addition to BCHD, by the County Department of Transportation and the Redondo Beach Community Development Department. This plan would include implementation of robust public notification as well as traffic control procedures (e.g., temporary signage, construction flaggers, etc.).

For a detailed discussion and response to comments on the potential impact of construction-traffic on nearby schools, refer to Comment Response KB-3. As described therein, TUSD has acknowledged in the comment that these revisions would reduce potential impacts at Towers Elementary School and eliminate potential impacts at Magruder Middle School. BCHD has incorporated these suggested revisions in keeping with MM T-2, which requires that the proposed haul routes are “*consistent with the Redondo Beach and Torrance General Plan designations.*”

Comment TRAO-114

The comment recounts an example of potential dust impacts at Gateway Element School in St. Louis, Missouri. As noted in multiple responses above, the EIR employs sophisticated computer modeling to exhaustively analyze construction-related criteria air pollutant emissions impacts, including fugitive dust. For a detailed discussion and response to comments pertaining to fugitive dust emissions, refer to Master Response 10 – Air Quality Analysis. MM AQ-1 requires the preparation and implementation of an Air Quality Management Plan for project construction, which shall be approved by the City of Redondo Beach and the City of Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. CEQA Guidelines Section 15097 requires that the lead agency adopt a MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines

provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment TRAO-115

The comment incorrectly states that there will be close to 10,000 truck trips during the AM and PM peak hours. The EIR states in numerous locations that “...soil excavation and export would involve up to 1,250 haul truck trips over a 1-month period. This average soil export rate may be increased or decreased depending on availability of haul trucks during the construction period as well as the rate of shoring installation.” The Construction Traffic and Access Management Plan required by MM T-2 limits work within the public right-of-way to the period between 9:00 a.m. and 4:00 p.m.. which applies to dirt and demolition material hauling and construction material delivery. As such, construction-related truck traffic would not occur within the AM or PM peak hours.

Comment TRAO-116

This comment restates that impacts to school children’s safety must be analyzed and mitigation must be implemented. Refer to the response to Comment TRAO-113.

Comment TRAO-117

The comment incorrectly claims that the number of intersections operating at LOS E or LOS F would increase from five to seven with the implementation of the proposed Project. Impacts to intersection operations as measured by LOS is no longer considered a CEQA impact. Refer to the response to Comment TRAO-43 for a detailed discussion and response to comments pertaining to this issue. While this comment correctly notes that seven intersections would operate at LOS E or F at one or both of the peak hours, the comment fails to acknowledge that the intersections would operate at these conditions without the proposed Project as described for the Cumulative (2032) Baseline condition. In fact, implementation of the proposed Project would result in a minor reduction in the V/C ratio or intersection delay for the AM and PM peak hour at each of these intersections, with the exception of the intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street. This is due to the minor reduction in peak hour trips associated with the proposed Project. The intersections of Harkness Lane & Beryl Street and Flagler Lane & Beryl Street would experience a minor increase in the V/C ratio or intersection delay due to the redistribution of trips associated with the proposed Project; however, as with each of the other

intersections evaluated in the Non-CEQA Intersection Operational Evaluation, these minor increases in V/C ratios or intersection delays would not exceed the non-CEQA thresholds of evaluation for the City of Redondo Beach or the City of Torrance.

Comment TRAO-118

The comment requests that health impacts on children traveling to and from school or on playgrounds be analyzed in the air quality analysis. The EIR already provides a detailed assessment of human health risk during construction. As described in the response to Comment TRAO-28, the construction HRA, which was prepared for the purpose of assessing the health risk associated with air emissions during construction, conservatively quantifies cancer risk and non-cancer chronic health effects at the PMI and for the MEIR. The PMI is the location where the cancer risk or non-cancer chronic health effect is at the maximum level, regardless of the presence of a human receptor at that location. No concentration higher than the concentration at the PMI would occur from the proposed construction activities. The dispersion modeling was conducted to estimate ground-level DPM concentrations for the PMI, MEIR, Towers Elementary School, Beryl Heights Elementary School, and residents living at the Silverado Beach Cities Memory Care Community and at the proposed RCFE Building that would be constructed during Phase 1 of the proposed Project. Health risk calculations were performed using the OEHHA methodologies and exposure parameters (including age sensitivity factors) as well as the corresponding SCAQMD guidance documents. As described in detail within the EIR and the construction HRA, with implementation of all required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts to sensitive receptors would be less than significant when compared to the SCAQMD thresholds for criteria pollutant emissions and the CARB thresholds for TACs.

Comment TRAO-119

The commenter claims that the EIR does not address construction parking. The courts have reaffirmed that parking shortfalls compared to demand represent an “...*inconvenience to drivers, but are not a significant physical impact on the environment.*” (San Franciscans Upholding the Downtown Plan v. City and County of San Francisco [“SFUDP”] [1st Dist. 2002] 102 Cal.App.4th 656, 697). Rather the EIR must “...*fulfill its CEQA-mandated purpose by identifying ways in which the secondary environmental impacts resulting from the project parking*” and identifying ways in which those impacts “*could be mitigated.*” Following this decision, the Appendix G of the CEQA Guidelines was revised to delete from its Transportation/Traffic section the question: “*Would the project ... [r]esult in inadequate parking capacity?*”

The EIR clearly identifies the potential impacts related to temporary, but prolonged construction-traffic impacts under Impact T-2 in Section 3.14, *Transportation*. The EIR acknowledges that construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the vicinity of the Project site would be potentially significant. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would identify designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. With the implementation of MM T-2, construction-related hazards – including hazards associated with construction parking – would be reduced to less than significant with mitigation.

Comment TRAO-120

The comment raises concerns about the number of boring locations and the results of the Phase II Environmental Site Assessment (ESA). The comment also contends that the known contamination on-site could result in health impacts that have not been addressed by BCHD. However, the EIR already thoroughly discloses and discusses the existing conditions regarding contamination on the Project site, which was informed by the completion of Phase I and Phase II ESAs. Refer to Master Comment Response 11 – Hazards and Hazardous Materials for a detailed description of these studies. The Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants. Three of the screened contaminants were detected in excess of their residential screening levels: tetrachloroethylene (PCE), benzene, and chloroform. All three of these contaminants are classed as VOCs. No further soil boring sampling, which was requested by some commenters, is necessary because the presence of contaminants has already been identified.

While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, *Hazards*

and Hazardous Materials). Implementation of MM HAZ-2a through -2d would ensure that PCE and the other identified VOCs are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through MM HAZ-2d impacts would be less than significant.

With regard to long-term remediation activities, as described in Section 3.8.1, *Environmental Setting*, BCHD notified the LACoFD Health Hazardous Materials Division and the Los Angeles RWQCB of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the CUPA for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup.

Comment TRAO-121

This comment claims that the plan for excavation and grading control is incomplete. The comment requests that the City of Redondo Beach and the City of Torrance review and approve excavation activities. This requirement is discussed in Section 1.5, *Required Approvals*, which identifies the need for grading permits from the Redondo Beach Building & Safety Division as well as the Torrance Engineering Division. Prior to issuance of any such approvals, both cities would be required to review the proposed grading plans. BCHD also would be required to comply with any permit conditions related to excavation and grading operations.

The comment also states that the EIR must evaluate the potential for soil liquefaction and address the potential for crude oil escaping from the previously plugged and abandoned oil and gas well on the vacant Flagler Lot. The issue of liquification is addressed in detail under Impact GEO-1 in Section 3.6, *Geology and Soils*, which explains that the Project site is not located within a designated liquefiable area mapped by the State or the Redondo Beach Local Hazard Mitigation Plan Liquefaction Zones Map. The Geotechnical Report prepared for the proposed Project categorizes the underlying soils as silty and clayey sands with low risk of liquefaction. Therefore, required compliance with the California Building Code (CBC) would ensure that potential impacts associated with liquefaction would be less than significant. Issues related to the previously plugged and abandoned oil and gas well are addressed under Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*. As described therein, Total Petroleum Hydrocarbons (TPH) in the heavy oil range were detected in two samples at boring locations within the vacant Flagler Lot. These concentrations are most likely related to the abandoned oil and gas well located at this site;

however, they are well below the Department of Toxic Substances Control (DTSC) and USEPA residential screening level and do not represent a potential hazard to the environment or public health. Terra-Petra Environmental Engineering (Terra-Petra) excavated the well to physically locate it and complete a leak test, which was negative (i.e., no leaks were detected). Terra-Petra has prepared a summary report, which has since been shared with CalGEM, the responsible oversight agency. BCHD has enrolled into the CalGEM Well Review Program, pursuant to MM HAZ-3, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to avoid future liabilities.

Comment TRAO-122

The comment asserts, without regard to extensive discussion, analysis and supporting technical studies in the EIR, that the precise location of the abandoned oil well is unknown and must be identified because it affects the design of the proposed Project. Contrary to this assertion, BCHD has spent considerable time and effort to identify the precise location of the well, which is described in detail in Section 3.8, *Hazards and Hazardous Materials*. The comment summarizes many of the steps that were taken to identify the location of the oil and gas well, beginning with its identification in the Phase I ESA. These steps included preparation of a Phase II ESA, review of aerial photographs, and excavation activities, all of which were conducted by Converse Consultants. When Converse Consultants was unable to identify the precise location of the well, BCHD contracted with Terra-Petra to prepare a geophysical survey of the site. This survey identified a magnetic anomaly suspected to be the oil and gas well, which was identified approximately 30-feet east of the western fence boundary and approximately 30 feet north of the toe of the slope at the vacant Flagler Lot. As described in the response to Comment TRAO-121 Terra-Petra then excavated this location, physically identified the well, and completed a leak test. Terra-Petra has prepared a summary report, which has since been shared with CalGEM, the responsible oversight agency.

As described under Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*, the proposed Project has been designed to comply with all applicable CalGEM recommendations including avoiding construction of permanent structures in close proximity to a well. CalGEM defines “*close proximity*” as being within 10 feet from a well. Refer to Master Comment Response 11 – Hazards and Hazardous Materials for a detailed discussion and response to comments pertaining to the previously plugged and abandoned oil well.

With regard to the reference in the comment to the description of potential impacts to mineral resources, the Initial Study provided in Appendix A correctly identifies that no impact to mineral

resources would occur because there are no active mining operations on the Project site and the site is not identified as a designated mining site in the City of Redondo Beach General Plan.

Comment TRAO-123

The comment claims that the number of estimated EMS requests is understated and asserts that the true number of calls will be at least doubled because they should be calculated per unit, not per bed. As described in Section 3.13, *Public Services* previous records indicate that a total of 451 EMS calls associated with the BCHD campus at 514 North Prospect Avenue occurred between January 2015 and July 2019, with an average of 98 calls per year, which is just over 8 calls per month for the 60 double-occupancy Memory Care units with 120 beds total. For reference, this is similar to the 85 calls per year assumed in the Draft EIR prepared for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 203121065). Based on these data, a factor of 0.82 annual calls per bed space per year was used to estimate the EMS requests associated with the proposed Assisted Living program and Memory Care community. Implementation of Phase 1 of the proposed Project would relocate the 60 existing double occupancy Memory Care units (120 bed spaces) and develop 157 new Assisted Living units (177 new bed spaces), resulting in a total of 297 bed spaces. Therefore, the proposed Assisted Living program and Memory Care community would generate an estimated total of 244 emergency calls following the completion of Phase 1 (i.e., approximately 20 calls per month). While the commenter requests that the number of EMS requests be calculated per unit, this would result in an underestimate given that many of the proposed Assisted Living units and Memory Care units would have more than one bed space associated with them.

Comment TRAO-124

This comment asserts, without supporting substantial evidence or technical study, that peak noise would be experienced for a period of more than 10 seconds and over a much wider geographic area than described in the EIR, primarily due to unique local factors such as wind and topography. The EIR describes the peak noise levels of sirens of 100 dBA at 100 feet and goes on to describe that this noise level decreases by approximately 3 dBA for every doubling of distance. While the local wind and topography may create an environment in which siren noise can be heard for longer durations, given the distance and intervening structures, the proposed Project would not result in an exposure to peak noise levels of 91 to 100 dBA. The EIR estimates that the frequency of EMS response would increase from 98 calls per year to 244 calls per year, which is an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the RBMC and TMC. Nor would this magnitude and frequency of noise

exposure substantially contribute to increases in noise that could measurably result in health issues. Refer also to the response to Comment TRAO-35.

Comment TRAO-125

The comment claims that the EIR understates the need for EMS responses because it does not identify and differentiate the needs of elderly persons. As described in the response to Comment TRAO-123, previous records indicate that a total of 451 EMS calls associated with the BCHD campus at 514 North Prospect Avenue occurred between January 2015 and July 2019, with an average of 98 calls per year, which is and just over 8 calls per month for the 60 double-occupancy Memory Care units with 120 beds total. For reference this is similar to the 85 calls per year assumed in the Draft EIR prepared for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 203121065). In fact, the assumed number of calls per year assumed in the Kensington Assisted Living Facility Draft EIR was based on a lower average per bed estimate of 0.65 calls per bed per year to a similar facility within the City. As described further under Impact PS-1 in Section 3.13, *Public Services*, this analysis conservatively assumes that each of the EMS calls for the existing BCHD campus was associated with the Silverado Beach Cities Memory Care Community, rather than other medical office building space or the CHF currently located within the Beach Cities Health Center at 514 North Prospect Avenue. It is not likely that EMS calls would increase to this extent because at least some of the calls to the existing campus are likely attributable to other uses in the Beach Cities Health Center, which would no longer operate under the proposed Project.

Comment TRAO-126

This comment states that the firefighter to resident ratio is deceptively used and the analysis should consider the proportion of the at-risk elderly population served by RBFD Stations 1 and 2 as well as budget issues and costs for non-citizens, among other issues. However, the EIR provides detailed analysis of emergency response issues based on substantial evidence in the record including multiple contacts with emergency service providers.

As described under Impact PS-1, it is assumed that all future EMS responses would be addressed by RBFD Fire Station No. 1 or 2, similar to each of the responses to EMS calls from 2015-2019. Currently, the RBFD has a ratio of 0.93 sworn personnel to every 1,000 residents using the estimated 2019 population of 66,749. The addition of 177 Assisted Living residents to the BCHD campus would not substantially alter the ratio of firefighters from 0.93 sworn personnel for every 1,000 residents. This minor increase in population would reduce the ratio by < 0.01 , and does not account for the fact that some of the residents would likely already be part of the Redondo Beach

population prior to moving the Assisted Living facility. As discussed in Section 3.12, *Population and Housing*, new employees and visitors to the BCHD campus would be drawn from the South Bay region and would not measurably affect the ratio of firefighters to residents. Rbfd's average response times regularly meet their total response time goals (refer to Table 3.13-1), and Rbfd has the existing required assets to respond to emergencies at the existing Beach Cities Health Center. The proposed Project would redevelop the existing Beach Cities campus, which is in close proximity (<1.2 miles) from Rbfd's three Fire Stations. Because response times to the existing campus are satisfactory and the proposed Project would only very slightly increase the demand for Rbfd services, the proposed Project would continue to be located well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the Rbfd and would not require new or physically altered Rbfd facilities.

As described in Section 3.13.3, *Impact Assessment and Methodology – Fire Project Appendix G* of the CEQA Guidelines requires that the analysis determine whether, “[t]he project would result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.” The costs of such services are a matter of City budgeting and is routinely addressed through the payment of development fees. The comments on the cost of fire protection services is not a comment on the adequacy of the environmental analysis in the EIR.

Comment TRAO-127

This comment cites CEQA Guidelines Section 15123(a) regarding the adequacy of an EIR and claims that there is insufficient information about the proposed electrical distribution system. However, the EIR provides detailed discussion of all project components, including the proposed electrical system. The proposed electrical distribution system is described in detail in Section 2.5.1.4, *Utilities and Services*. The location of the proposed Southern California Edison (SCE) Substation Yard is shown on Figure 2-5 and Figure 2-7. Additional information is provided in Section 3.5, *Energy*, which describes that the 16 kilovolt (kV) or 4.16 kV line along North Prospect Avenue would be brought onto the Project site from a service drop along North Prospect Avenue. This medium voltage line would be distributed on-site via a proposed distribution system including a SCE Substation Yard and generator yard, which would be located along the eastern perimeter of the Project site, immediately east of the pedestrian promenade.

Impacts associated with the grading and construction of the proposed electrical distribution system are discussed together with the grading and construction for the rest of the proposed development

under Phase 1 and Phase 2. The issues associated with PCE-contaminated soils are discussed at length in Section 3.8, *Hazards and Hazardous Materials*, and MM HAZ-2a through HAZ-2d, which would require the preparation of a soils management plan, soil vapor monitoring, the use of soil vapor extraction equipment, and the procedures in the event that previously unknown or unidentified soil or groundwater contamination is encountered, would apply during the construction of the proposed electrical distribution system.

In terms of operational noise, the proposed electrical distribution system, including the SCE Substation Yard, would be required to comply with the City of Redondo Beach and the City of Torrance noise ordinances, including all maximum permissible sound level requirements by land use type. With regard to impacts to nesting birds, if construction activities occur within the nesting bird season, a pre-construction nesting bird survey would be required under MM BIO-1. Depending on the results of these surveys, avoidance and monitoring would be required to avoid impacts and potential conflicts with the Migratory Bird Treaty Act and/or the California Department of Fish and Game Code. For a detailed discussion and response to comments pertaining to health and biological risks, refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

Comment TRAO-128

This comment states that the EIR should evaluate a potential increase in rat invasions. First it should be noted that the threshold that has been cited in the comment selectively omits “...on any species identified as candidate, sensitive, or special status species...” Rodents are not candidate, sensitive, or special status species. Nevertheless, issues related to rodents are discussed in the EIR, which notes that “...due to the presence of the Silverado Memory Care Community and associated dining services on the BCHD campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus.” In light of this ongoing program, assertions that rodents would seek other homes in droves and the neighborhood will essentially become collateral damage during construction is unsupported by substantial evidence. The EIR adequately discloses and discusses such issues and BCHD programs proactively address such potential concerns.

Comment TRAO-130

The comment asserts that strong ozone (O₃) mitigations are required and cites CEQA Guidelines Section 15125(d), which states that “...any inconsistencies between the proposed project and...applicable air quality attainment or maintenance plan or State Implementation Plans” must be described. However, the EIR exhaustively analyzes potential air quality impacts based on

sophisticated computer modeling consistent with CEQA and regulatory agency requirements. Section 3.2, *Air Quality* specifically discusses the attainment status of the South Coast Air Basin (refer to Table 3.2-2). The comment goes on to reference the concentration of O₃ as presented in Table 3.2-3. However, the comment fails to acknowledge that this table describes the “*number of days the threshold was exceeded and maximum levels during violations.*” The comment further fails to acknowledge that last recorded exceedances – which only occurred on three individual days during the years – occurred in 2016. No exceedances have been recorded since.

The EIR fully addresses consistency with the SCAQMD’s 2016 AQMP under Impact AQ-1 in Section 3.2, *Air Quality*. As described therein, neither construction-related or operational emissions of NO_x or VOCs (which are the primary constituents causing the formation of ground-level O₃) would exceed the SCAQMD’s mass daily significance thresholds or the SCAQMD LSTs for sensitive receptors located within 25 meters (i.e., approximately 82 feet) of the Project site. Further, with the implementation of MM AQ-1, which addresses PM₁₀ and PM_{2.5} construction-related emissions of PM₁₀ and PM_{2.5}, emissions of NO_x and VOCs would be further reduced below these thresholds. Therefore, the proposed Project would not conflict with the SCAQMD’s 2016 AQMP or require additional mitigation measures to address ground-level O₃.

Comment TRAO-131

This comment states that effect of shadows on health is well documented, and that the context presented for the analysis of shade and shadows pursuant to the requirements of CEQA is incorrect. While an internet search for “*CEQA shadow*” may return a number of results, the CEQA Guidelines do not specifically mention the terms “*shade*” or “*shadow.*” Shade and shadows are typically only analyzed in an EIR when the lead agency, pursuant to CEQA Guidelines 15064.7(b), adopts methodologies and thresholds for assessing such an impact. The EIR already provides detailed analysis of these issues.

As described in Section 3.1.3, *Impact Assessment and Methodology*, neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. Nevertheless, having received scoping comments about the potential for the proposed Project to cast shadows (refer to Appendix A), BCHD elected to use *The City of Los Angeles CEQA Thresholds* to evaluate such impacts. It should be noted that this approach is not unique and has been used by a wide number of local jurisdictions within Los Angeles County – including both coastal and inland areas – that do not have their own quantitative significance thresholds for shade/shadow impacts (e.g., City of Santa Monica, City of Long Beach, Culver City, etc.).

Comment TRAO-132

The comment claims, without substantial evidence, supporting expert opinion or technical study, that the shadow analysis presented in the EIR is superficial. However, the EIR provides detailed modeling of potential changes in shade and shadows performed by licensed architects. A detailed discussion and response to comments pertaining to the shade and shadow study is presented in Master Response 9 – Aesthetics and Visual Resource Analysis. As described in Section 3.1, *Aesthetics and Visual Resources*, shadow length and bearing are dependent on the location of a site, which determines the angle of the sun relative to the Project site. In the Los Angeles basin, the maximum shadow a building can cast is usually equivalent to three times its height during the Winter Solstice (City of Los Angeles 2006). The potential for off-site shadow effects is dependent on the length of shadows created by a building, and the distance between the building and the nearest shade-sensitive land uses.

Shade and shadow simulations were prepared for the proposed Project using a computer-generated 3D model to identify the height and bulk of proposed building elements, mapping the footprint (i.e., location, shape, and size) of the Project site, and then calculating and diagramming the shadows that would be cast by the building components during the most extreme, or conservative, conditions (see Appendix M). The analysis simulates shadows for the Summer Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 6:00 p.m., for the Autumnal (Fall) Equinox at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., 4:00 p.m., and 5:00 p.m., and for the Winter Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 4:00 p.m. By modeling shadows for the Autumnal Equinox and the Summer and Winter Solstices, it is possible to see and analyze the worst and best-case scenarios of future shadow effects.

With respect to building height relative to the surrounding uses, the shade and shadow study took the surrounding topography and existing development into account as a part of the modeling. As described in Section 3.1, *Aesthetics and Visual Resources*, the shade and shadow study was prepared to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development. The claim that the analysis provides no measurements is also untrue. As describe under Impact VIS-4, shadow lengths and durations were clearly calculated and compared to *The City of Los Angeles CEQA Thresholds*.

The maximum height of the proposed mixed-use buildings on the Project site would be up to 103 feet above ground level and 133.5 feet above the vacant Flagler Lot below. This height would cast shadows on adjacent and vicinity buildings and public streets, including shadow-sensitive structures. However, as described under Impact VIS-4, none of the shade and shadows impacts would exceed the thresholds established in the EIR, which describe that a significant shade and

shadow impact would occur “...if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).”

With respect to the requests for additional analysis, including a survey of the playground including the number of students who arrive at the school early, the number of students who come to the school late, CEQA Guidelines Section 15204(a) specifically states that “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.” The shade and shadow analysis provided in the EIR is quantitative, assesses key periods of maximum and minimum shadows, and assesses impacts with respect to accepted quantitative thresholds that are widely used by local municipalities within Los Angeles County.

Comment TRAO-132

This comment claims, without substantial evidence, supporting expert opinion or technical study, that the analysis of glare provided in the EIR is deficient and claims that the analysis does not address the full impact of glare, including increased heat, distraction, and nuisance. As described in Section 3.2, *Aesthetics and Visual Resources*, the analysis of light and glare describes the new sources of light and glare that would be introduced under the proposed Project in the context of existing light and glare standards in the Redondo Beach Residential Design Guidelines, RBMC, and TMC.

Impact VIS-3 acknowledges that the proposed Project may include new sources of glare associated with glazing (windows) and other reflective materials used in the façade of the proposed structures, which could potentially result in increased glare emanating from the Project site. However, as described under Impact VIS-3, the exterior of the proposed building shall be constructed of low- or no-glare materials, such as high-performance tinted non-reflective or non-mirrored glass and low reflective surfaces, with Light Reflective Values of less than 35 percent. The proposed Project also would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. The reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare effects on public views.

The citation from the Council on Tall Buildings in Urban Habitat in the comment discusses a range of issues for sky scrapers (i.e., well over 20 stories) and cites legislation in Singapore and Australia

that limits reflectivity in construction materials to 20 percent. However, this citation also discusses the confluence of “...*complex geometries in buildings with more elaborate palette of exterior materials.*” Other cities in the United States (e.g., City of Santa Monica) have also adopted some limitations on reflective materials (e.g., Santa Monica Municipal Code state that reflective materials may not exceed more than 25 percent of the façade surface area and prohibits the use of black or mirrored glass). However, there are no uniform requirements regarding reflective materials, and specific design requirements tend to be locally determined.

As described under Impact VIS-3, the exterior of the proposed building shall be constructed with “*low- or no-glare materials,*” with light reflective values of “*less than*” 35 percent. The proposed Project also would be subject to Redondo Beach Planning Commission Design Review. Through that process, specific high-performance tinted non-reflective or low reflective surfaces will be identified and required as conditions of approval for the proposed Project, so as not to produce obtrusive glare onto the public right-of-way or adjacent properties and to avoid issues such as those raised in the comment.

Comment TRAO-133

This comment implies that the EIR does not adequately assess potential impacts associated with asbestos containing material (ACM). However, the EIR provides substantial information and analysis of ACM related issues based on technical studies prepared by licensed experts and required mitigation measures to address potential impacts.

The potential for hazardous building materials, including ACM, to be present within the Beach Cities Health Center is described in Section 3.8, *Hazards and Hazardous Materials*. MM HAZ-1 requires BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and, potentially, the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not emitted into the surrounding environment. During construction the licensed contractor(s) shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed. MM HAZ-1 clearly meets the requirements for mitigation to avoid impacts related to the potential for exposure to hazardous building materials.

Additionally, CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment TRAO-134

This comment asserts that the existing BCHD campus is an area of high cultural sensitivity and Native American monitoring is required for all ground-disturbing activities. Contrary to this assertion, the Project site has been disturbed, with extensive excavation, dating back to the original development of the South Bay Hospital (refer to Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Nevertheless, MM CUL-1 requires the development of a Cultural Resources Monitoring Plan to be developed in coordination with representatives of the Native American tribes that consulted on the proposed Project pursuant to AB 52. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist and Native American tribal monitor shall be required during ground disturbing activities – including (but not limited to) clearing/grubbing, excavations, grading, and trenching – during the construction activities associated with Phase 1 and Phase 2 of the proposed Project.

With regard to the request to remove the word “*Tongva*” from the EIR, it should be noted that the NAHC specifically identified the following five Native American tribes and/or individuals with a geographic affiliation to the county within which the Project site is located:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians-Kizh Nation;
- Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians;
- Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council;
- Sandonne Goad, Chairperson, Gabrielino/Tongva Nation; and
- Charles Alvarez, Gabrielino-Tongva Tribe

Given that these contacts were provided by the NAHC, the regulatory authority responsible for identifying, cataloging, and protecting Native American cultural resources, the references to “*Tongva*” have not been revised as the comment requests.

8.3.4 Legal Comments

Letter RLD

June 10, 2021
Rebecca L. Davis
Lozeau | Drury LLP on behalf of SAFER

Comment RLD-1

The comment states that Lozeau | Drury LLP is representing the Supporters Alliance for Environmental Responsibility (SAFER). The comment summarizes the individual components of the proposed Project and without stating any specific issues or challenging any of the analysis provided, the comment asserts that the Draft Environmental Impact Report (EIR) fails as an informational document and fails to impose all feasible mitigation measures. Without any specific requests for revisions the comment requests recirculation of the Draft EIR. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. However, no substantial evidence has been provided to suggest that any of the triggers for recirculation described under CEQA Guidelines 15088.5 have been met.

Letter RR1

June 3, 2021
Robert R. Rone
Post Office Box 3211
Redondo Beach, California 90277

Comment RRI-1

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RRI-2

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also

notes that public participation is “*an essential part of the CEQA process*” (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 1.0, *Introduction* and Section 2.0, *Project Description* are provided in detail in the responses to Comment RR1-3 and RR1-9.

Comment RR1-3

The comment notes that an EIR is meant to be an objective, factual report on impacts which a proposed project would have on the environment. This comment is noted and is generally supported by California Public Resource Code § 21002.1(a), which describes that “[*t*]he purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” This comment is also generally supported by CEQA Guidelines Section 15151, which describes the standards for adequacy of the EIR.

The comment goes on to claim that BCHD has improperly and prematurely approved the proposed Project, citing the following actions that the comment asserts demonstrate approval: favoring a project; defending a project against opposition, and devoting extensive public resources to a project. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

The comment goes on to cite *Save Tara v. City of West Hollywood, etc., et. al.*, 45 Cal.4th 116 (2008). However, it should be noted that this case dealt with whether and under what circumstances an agency's agreement allowing private development, conditioned on future compliance with CEQA, constitute approval of the project within the meaning of California Public Resources Code Sections 21100 and 21151. In particular, the Court found conditional agreement to sell land for private development, coupled with financial support, public statements, and other actions by its officials committing the city to the development. The Court did not find that development of a proposed master plan – including the commitment of funding for the preparation of market studies,

architectural design drawings, technical studies – or discussions during CWG, open houses, or at well-noticed public meetings constituted an approval action.

Comment RRI-4

The comment references CEQA Guidelines 15352(a), which provides a definition for approval. The BCHD Board of Directors have taken no action “...which commits the agency to a definite course of action...” CEQA Guidelines 15352(b) goes on to state that “[w]ith private approval occurs upon the earliest commitment to issue or the issuance by the public agency of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of the project.” Neither of these conditions have occurred with respect to the proposed Healthy Living Campus Master Plan. Contrary to the assertions in this comment, the BCHD Board of Directors have not approved the proposed Project or otherwise committed BCHD to a definite course of action. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. Any decisions or approvals regarding the proposed Project or its alternatives will only be considered after the Final EIR has been certified, consistent with CEQA Guidelines 15090.

Comment RRI-5

The comment summarizes the discussion of the project pillars and project objectives identified in Section 2.4.3, *Project Objectives*. The comment goes on to assert that the project objectives are about money or generating revenue. The comment goes on to claim that there is a singular focus on the proposed Project and BCHD has not appropriately considered finding other sources of revenue including cutting costs. For a detailed discussion and response to comments regarding the purpose and need as well as project objectives refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives.

As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach and Manhattan Beach as well as tens of thousands within other South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and

wellness services to its service population within the Beach Cities and the nearby South Bay communities.

Again, the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potential physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan.

With regard to the request to consider cutting costs, it should be noted that cutting costs would result in a reduction in community health and wellness programs and services provided by BCHD. Nevertheless, a reduction in such services is contemplated under the No Project Alternative. Additionally, given demolition activities described under the No Project Alternative may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing BCHD campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

Comment RR1-6

The comment restates the assertion that BCHD has approved the proposed Project. The comment goes on to make unfounded claims that one member of the BCHD Board of Directors has been ostracized and isolated in response to the position held on the proposed Healthy Living Campus Master Plan. For a detailed discussion and response to comments regarding the perceived approval of the proposed Project refer to the response to Comment RR1-3.

Comment RR1-7

The comment provides the handling of the previously plugged and abandoned oil well as an example of a red flag. The comment incorrectly asserts that the previously plugged and abandoned oil well has not been physically located. For a detailed discussion and response to comments pertaining to the previously abandoned oil and gas well on the vacant Flagler Lot, refer to Master Response 8 – Hazards and Hazardous Materials. As described therein, the Phase I ESA identified several potential environmental conditions at the Project site including a previously plugged and abandoned oil and gas well on the vacant Flagler Lot. Converse Consultants was unable to confirm the precise location of the well. However, in September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM’s Well Review Program and compliance with CalGEM’s advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

Comment RR1-8

The comment asserts that BCHD has committed significant resources to shaping the proposed Project and implies that this constitutes a definite course of action with regard to the proposed Healthy Living Campus Master Plan. For a detailed discussion and response to comments regarding the perceived approval of the proposed Project, refer to the responses to Comment RR1-3 and RR1-4. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. The specific budget for the development of the Healthy Living Campus Master Plan is not germane

to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment RR1-9

The comment restates the assertion that the BCHD Board of Directors has approved the proposed Project as a result of committing funds, citing the agreement with Cain Brothers. For a detailed discussion and response to comments regarding the perceived approval of the proposed Project, refer to the responses to Comment RR1-3 and RR1-4. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. For example, at the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

Comment RR1-10

The comment incorrectly concludes that the funding allocated to the development of the proposed Healthy Living Campus Master Plan constitutes an approval action. Refer to the individual responses to Comment RR1-2 through RR1-9. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. Any decisions or approvals regarding the proposed Project or its alternatives will only be considered after the Final EIR has been certified, consistent with CEQA Guidelines 15090.

Letter RR2

June 3, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR2-1

The comment notes that the attached letter and the comments provided therein constitute individual comments on the Draft Environmental Impact Report (EIR). Pursuant to the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR2-2

This comment identifies the correct process for submitting comments on the Draft EIR, which has been prepared in accordance with the requirements of the CEQA. These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR2-3

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also notes that public participation is “an essential part of the CEQA process” (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 3.1, *Aesthetics and Visual Resources* and Section 5.0, *Alternatives* are provided in detail in the responses to Comment RR2-4 and RR2-9.

Comment RR2-4

The comment describes that glare is the reflection of sunlight from the exterior of a building. The comment goes on to assert that the EIR requires the consideration of mitigation measures beyond those which may exist in building codes as building codes lag behind the impacts created by glare.

Glare is clearly described in Section 3.1, *Aesthetics and Visual Resources* as largely a daytime phenomenon, occurring when sunlight is reflected off highly polished surfaces or objects (e.g., windows, windshields, etc.), light-colored surfaces, or by vehicle headlights on adjacent roadways. The description acknowledges that excessive glare not only restricts visibility but can also increase the ambient heat reflectivity in each area. The description goes on to identify existing sources of glare on the existing BCHD campus and identifies light and glare sensitive receptors in the vicinity.

Table 3.1-2 under Impact VIS-2 describes the consistency of the proposed Project with existing policies in the Redondo Beach General Plan Land Use Element and Parks and Recreation Element. These policies generally involve glare associated with lighting.

Impact VIS-3 goes on to acknowledge that the proposed Project may also include new sources of glare associated with glazing (windows) and other reflective materials used in the façade of the proposed structures, which could potentially result in increased glare emanating from the Project site. The analysis discloses that the building design details remain conceptual and specific colors, siding, windows, and overall materials are still being refined. Pursuant to RBMC Section 10-2.1116 the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details cannot be finalized at this time. Contrary to the assertion that this makes the description of the proposed Project unstable, this is entirely common for projects in a variety of local jurisdictions (e.g., City of Santa Monica). This is also true for the analysis of the Kensington Senior Living Project within the City of Redondo Beach, which is also located on a parcel designated as P-CF. Nevertheless, Impact VIS-3 acknowledges that the proposed increase in building mass and size, it is expected that the Project would include a greater number of windows and reflective surfaces than the existing Project site. The analysis goes on to describe that the reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. The exterior of the proposed building would be constructed of low- or no-glare materials, such as high-performance tinted non-reflective or non-mirrored glass and low reflective surfaces, with Light Reflective Values of less than 35 percent. Specific design requirements would be further refined during the Redondo Beach Planning Commission Design Review prior to the issuance of building permits to further minimize the lighting and glare effects on public views.

Comment RR2-4

The comment suggests that the use of materials with Light Reflective Values of less than 35 percent is not adequate and provides a reference from the Council on Tall Buildings in Urban Habitat. As described in the response to Comment TRAO-132, this reference discusses a range of issues for sky scrapers (i.e., well over 10 stories) and cites legislation in Singapore and Australia that limits reflectivity in construction materials to 20 percent and 15 percent, respectively. However, it should be noted that this citation also discusses to confluence of complex geometries in buildings with more elaborate palette of exterior materials. Examples provided in the reference include 20 Fenchurch Street in London, UK (38 stories and 525 feet tall), Campbell Center located in Dallas, Texas (22 stories and 267 feet tall), Vdara Hotel located in Las Vegas, Nevada (57 stories

and 577 feet tall), Museum Tower located in Dallas, Texas (42 stories and 560 feet tall). These buildings are all more than 100 feet taller than the proposed RCFE Building and in some cases more than 400 feet taller. Additionally, each of these buildings has complex geometries (e.g., concave shapes) that can focus glare. These buildings are not comparable to the proposed RCFE Building or other development described under Phase 1 or Phase 2 of the proposed Healthy Living Campus Master Plan.

It is also important to emphasize, as described under Impact VIS-3, that the exterior of the proposed building shall be constructed with low- or no-glare materials, with light reflective values of less than 35 percent. While the Council on Tall Buildings in Urban Habitat notes that “[m]ost City building code briefly and lightly address solar reflectivity” it is important to note that the proposed Project would be subject to the Redondo Beach Planning Commission Design Review. Through that process, specific high-performance tinted non-reflective or low reflective surfaces would be identified and required as conditions of approval for the proposed Project, so as not to produce obtrusive glare onto the public right-of-way or adjacent properties and to avoid issues such as those raised in the comment.

Comment RR2-5

The comment claims that the EIR should have discussed the purported harmful impacts associated with the proposed development under the proposed Healthy Living Campus Master Plan. Each of these issues is addressed individually in the responses to Comment RR2-6 and RR2-8.

Comment RR2-6

The comment claims that the proposed Project would result in increased heat and provides the Disney Concert Hall in Los Angeles as evidence. It should be noted that the Disney Concert Hall is a highly complex architectural structure designed by Frank Gehry using a Computer-Aided Three-dimensional Interactive Application (CATIA). The structure, which is characterized by concave and convex surfaces, was constructed using brushed stainless steel with highly-polished panels on certain curved areas of the structure. (Building officials later determined that these highly-polished panels were the source of the controversial glare and heat.) The RCFE Building and the other buildings described under the proposed Healthy Living Campus Master Plan bear no resemblance to the Disney Concert Hall. Due to the lack of complex geometry, the lack of highly-polished stainless steel surface, and detailed design review and refinement of building materials during the Planning Commission Design Review, there is no substantial evidence to suggest that the proposed Project would result in increased heat that would result in physical harm or discomfort, property damage, or loss of vegetation.

Comment RR2-7

The comment suggests that glare could increase vehicle accidents and again references the Council on Tall Buildings in Urban Habitat, which notes that “...in the late 1990s, a glazed building located near a cloverleaf interchange in Sydney made this issue evident.” The reference went on to identify that “[a]ccording to the UK Automobile Association, nearly 3,000 accidents are caused yearly by direct sun glare.” However, this statistic was uncited and did not provide details on the types, locations, or causes of the accidents attributed to sun glare. It is important to note that the proposed development would not be located adjacent to a freeway or freeway interchange where vehicles are traveling at fast speeds. Instead, as described in Section 3.14, *Transportation*, the proposed Project would be located in an area where the majority of streets allow travel up to 35 miles per hour (mph) and intersections are controlled by signals and stop signs. Additionally, as described under Impact T-3, with compliance with local standards and regulations and review and approval by various local agencies, the proposed Project would not create potentially hazardous conditions for people driving. With the detailed design review and refinement of building materials during the Planning Commission Design Review, there is no substantial evidence to suggest that the proposed Project would result in glare that would cause vehicle accidents.

Comment RR2-8

The comment asserts that the EIR provides vague, general, and unsupported conclusions. The comment goes on to state that the glare greatly impacts vulnerable populations in the vicinity, including the very young and very old. As described in the response to RR2-4, Section 3.1, *Aesthetics and Visual Resources* identifies and discloses light and glare sensitive receptors in the vicinity, including nearby single-family residences along North Prospect Avenue, Flagler Lane, Flagler Alley, and Diamond Street, as well as multi-family residences along Beryl Street. Dominguez Park to the northeast of the Project site could also be considered a sensitive receptor to light and glare generated from the Project site. As described in the responses to Comment RR2-6 and RR2-7 with the detailed design review and refinement of building materials during the Planning Commission Design Review, there is no substantial evidence to suggest that the proposed Project would result significant glare impacts to these sensitive receptors.

Letter RR3

June 3, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR3-1

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR3-2

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also notes that public participation is “an essential part of the CEQA process” (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 1.0, *Introduction*, Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, and Section 5.0, *Alternatives* are provided in detail in the responses to Comment RR3-2 and RR3-15.

Comment RR3-3

The comment asserts that certain portions of the City of Torrance General Plan as well as the General Plan and Specific Plans of the City of Redondo Beach are inconsistent with the proposed Project and prevent it from going forward. The comment goes on to state that this is the same for certain ordinances and rules applicable to the proposed Project. Responses to individual assertions related to these issues are provided in detail in the responses to Comments RR3-4 through RR3-15.

Comment RR3-4

The comment cites CEQA Guidelines Section 15125(d), which states that “[t]he EIR shall discuss any inconsistencies between the proposed Project and applicable general plans, specific plans, and regional plans” as well as CEQA Guidelines Section 15124(c), which states that the description of the project shall contain “[a] general description of the project’s technical, economic, and environmental characteristics...” The EIR complies with both of the requirements under the CEQA Guidelines. Refer to Section 3.10, *Land Use and Planning* for a description of consistency with the applicable general plans, specific plans, and regional plans. Refer also to

Section 2.0, *Project Description*, for a detailed and complete description of the proposed Healthy Living Campus Master Plan.

Comment RR3-5

The comment asserts that the EIR does not address consistency with Torrance General Plan and specifically ignores the Torrance Hillside Overlay Zone. Contrary to the assertion, as described in Section 3.10, *Land Use and Planning*, the analysis for this category of impact does address the Torrance General Plan as well as the Torrance Municipal Code (TMC) and zoning ordinance.

Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issued by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are addressed in Section 3.10-5. Consistency with individual policies will also be considered by the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. The City of Torrance’s jurisdictional over land use boundary does not extend further into the campus beyond the municipal boundaries, however.

The comment claims that the EIR ignores the Torrance Hillside Overlay Zone. However, as described in Section 2.0, *Project Description*, the EIR discloses and acknowledges that “[t]he Torrance Property Zoning Map also identifies these Flagler Lane and Flagler Alley within the Hillside Overlay, which generally extends along the western border of Torrance.” Additionally, the Torrance Hillside Overlay Zone is depicted in Figure 3.10-2.

Comment RR3-6

The comment asserts that the EIR minimizes and fails to discuss other applicable items such as local street access codified by the City of Torrance. However, this issue is directly addressed in Table 3.10-6 in Section 3.10, *Land Use and Planning*. The consistency analysis provided therein acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

The comment goes on to describe that the EIR does not adequately discuss Measure DD, which the comment asserts prevents the proposed Project. Measure DD requires that any zoning changes in the City of Redondo Beach require a public vote. Given that the proposed Project would not require a change in zoning designation Measure DD is not applicable to the proposed Project. Measure DD is only discussed in so much as it applies to the alternatives discussed in Section 5.0, *Alternatives*.

Comment RR3-7

The comment restates issues related to the Torrance General Plan and the Torrance Hillside Overlay Zone, which are addressed in the response to Comment RR3-5. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issued by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

Comment RR3-8

The comment incorrectly states that the EIR ignored a legal duty to fully and completely discuss purported inconsistencies with the Torrance General Plan. These issues are addressed in the responses to Comment RR3-5 through RR3-7.

Comment RR3-9

The comment states that the Torrance Hillside Overlay Zone is a part of the Torrance General Plan and the EIR is obliged to discuss any inconsistencies. The comment references Figure 3.10-2, which shows the Torrance Hillside Overlay Zone overlays the City of Torrance right-of-way within the Project site. The applicability of the Torrance General Plan – including the Torrance Hillside Overlay Zone – are discussed in the responses to Comment RR3-5 through RR3-7. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issued by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

Comment RR3-10

The comment provides quotes from the Torrance Municipal Code regarding the City's Land Use Plan. For example, the comment states that as described in TMC Section 91.1.2, the City's Land Use Plan is binding on all governmental bodies, including all special taxing or assessment district

such as hospital districts. Similarly, the comment cites TMC Section 91.3.1, which describes the purpose of the Torrance Hillside Overlay Zone. The applicability of the Torrance General Plan – including the Torrance Hillside Overlay Zone – are discussed in the responses to Comments RR3-5 through RR3-7. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issued by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

Comment RR3-11

The comment restates that the proposed Project is located within Torrance Hillside Overlay Zone as acknowledged in Section 2.2.5, *Existing Land Use Designations and Zoning* and Figure 3.10-2. The comment correctly notes that the activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley include curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way. The comment states that the Torrance Hillside Overlay Zone land use restricts prohibit any of the building proposed by the Healthy Living Campus Master Plan. However, again, it is important to note that activities within the City of Torrance right-of-way would be limited to curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way. None of the RCFE Building footprint, subterranean service area and loading dock, or any of the other buildings described under Phase 1 or Phase 2 of the proposed Project would be located within the City of Torrance right-of-way.

Comment RR3-12

The comment restates that the Torrance Hillside Overlay Zone prevents the construction of the proposed Project and cites a number of requirements discussed under TMC Section 91.41.6. Again, as discussed in the responses to Comments RR3-5 through RR3-7, activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley would be limited to curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issued by the City of Torrance. None of these elements of the proposed Project occurring within the City of Torrance right of way would conflict with the provisions of TMC Section 91.41.6 identified in the comment. Consistency with individual policies will also be considered by the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. The City of Torrance’s jurisdictional over land use boundary does not extend further into the BCHD campus beyond the municipal boundaries, however.

Comment RR3-13

The comment restates that access to local streets in the City of Torrance represents a violation of the General Plan and Specific Plans of the City of Torrance as well as TMC 92.30.8. As described in the response to Comment RR3-6, this issue is directly addressed in Table 3.10-6 in Section 3.10, *Land Use and Planning*. The consistency analysis provided therein acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

Comment RR3-14

The comment restates issues the assertion that the EIR does not adequately discuss Measure DD. However, as discussed in the response to Comment RR3-6, Measure DD requires that any zoning changes in the City of Redondo Beach require a public vote. Given that the proposed Project would not require a change in zoning designation Measure DD is not applicable to the proposed Project. Measure DD is only discussed in so much as it applies to the alternatives discussed in Section 5.0, *Alternatives*.

The comment asserts that a public/private partnership represents a major change in allowable land use. First, as described in Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation. However, perhaps more importantly, the comment itself cites Section 27.2 of Measure DD, which defines a major change in allowable land use as “...*any proposed amendment, change, or replacement of the General Plan (including its local coastal element, as defined in Public Resources Code Section 30108.55), of the City’s zoning ordinance (as defined and contained in Title 10, Chapter 2 of the Redondo Beach Municipal Code) or of the zoning ordinance for the coastal zone (as defined and contained in Title 10, Chapter 5 of the Redondo Beach Municipal Code).*” This definition quite clearly does not apply to the proposed Project, given that the proposed Healthy Living Campus Master Plan would not require any proposed

amendment, change, or replacement of the City of Redondo Beach General Plan or the City's zoning ordinance.

Comment RR3-15

The comment asserts that the required land use applications for zoning changes, Conditions Use Permits (CUPs), and other required permits are unclear. However, contrary to this assertion, the required entitlements and approvals for the proposed Healthy Living Campus Master Plan are clearly defined in Section 1.5, *Required Approvals*.

Comment RR3-16

The incorrectly claims that the EIR is inconsistent with the requirements of CEQA. Refer to the individual responses to Comment RR1-2 through RR1-15, which provides a detailed discussion and response to comments regarding the land use issues raised in this comment.

Letter RR4

June 3, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR4-1

The comment states that it supplements the individual comments provided in Letter RR3. These comments have been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR4-2

The comment asserts that BCHD has failed to address land use restrictions, which prevent it from pursuing the proposed Healthy Living Campus Master Plan. The comment claims that the deed under which Beach Cities Health District (BCHD) acquired the campus states that it may be used for hospital services for the residents of said district and other together with appurtenant apparatus for such hospital. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. For decades, BCHD, which is a California Healthcare District, has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities.

Implementation of the proposed Project would not substantially alter the use of the BCHD campus, which would continue to provide needed community health and wellness programs and services, including needed senior housing. Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted in P-CF zones with a conditional use permit (CUP). Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes. The issue of deed under which the BCHD acquired the campus is not otherwise germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

Letter RR5

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR5-1

The comment states that it supplements the individual comments provided in Letter RR3. These comments have been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR5-2

The comment again asserts that the Beach Cities Health District (BCHD) has approved the proposed Project and cites the agenda packet that describes the general schedule for completing the environmental Impact Report (EIR) in compliance with California Environmental Quality Act (CEQA). It should be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

Letter RR6

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR6-1

The comment states that it supplements the individual comments provided in Letter RR3. These comments have been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR6-2

The comment again asserts that the Beach Cities Health District (BCHD) has approved the proposed Project and cites a Request for Qualifications (RFQ) that was advertised in the *Los Angeles Times*. To be clear, while BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

Letter RR7

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR7-1

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR7-2

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also notes that public participation is “an essential part of the CEQA process” (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and

asserts that for these reasons it must be withdrawn. Responses to individual assertions related to the role of the Beach Cities Health District as the lead agency are provided in detail in the responses to Comment RR7-3 and RR7-10.

Comment RR7-3

The comment claims that the EIR does not present a clear, finite, and stable project description selectively citing analysis in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3, which more completely describes, “[t]he building design details remain conceptual and specific colors, siding, windows, and overall materials are still being refined...” Pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1116 proposed developments in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details (i.e., specific building colors, siding, windows, and other building materials) cannot be finalized at this time. While the Planning Commission Design Review could also further limit floor area ratio (FAR), building height, setbacks, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

The comment also cites *Stopthemillenniumhollywood.co. v. City of Los Angeles*, 39 Cal. App. 5th 1 stating that project descriptions that are curtailed and enigmatic prevents the public’s ability to provide input. It should be noted however, that in this case the Court found Millennium filed a master land use permit, lacking any description or detail regarding what they intended to build. The initial study did not include any drawings or renderings; the number of buildings; or their shape, or size, or purpose. The only finite information was the development’s size, location, and purposes of existing buildings nearby. This is clearly not the case for the proposed Project as demonstrated by the robust description of the proposed Project provided in Section 2.0, *Project Description*.

Comment RR7-4

The comment states that BCHD cannot serve as the lead agency asserting that the proposed Project would be operated by a private entity, BCHD is a limited purpose agency, and BCHD has little or no responsibility for supervising or approving the project as a whole. For a detailed discussion and response to comments pertaining to the issue of lead agency status, refer to Master Response 2 – BCHD as Lead Agency.

Comment RR7-5

The comment restates the EIR lacks a clear, finite, and stable description of the proposed Project, which is addressed in the response to RR7-3. The comment goes on to reference the Cain Brothers

review of the Market Feasibility Study prepared by MDS Research Company, Inc. and asserts that there was no plan or entity to own or develop the proposed Project. It should be noted the comments in Letter RR1 assert that the authorization of funding for market feasibility studies and the peer review of these studies by Cain Brothers constituted a premature approval of the proposed Project. These comments in Letter RR7 suggesting that BCHD should have already selected an operator appear to be in conflict with that previous logic. To be clear, while BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. Similarly, on-going searches for potential partners and operators does not represent an approval action. In fact, such searches and preliminary conversations were necessary to understand programming needs for the proposed Health Living Campus to a sufficient level of detail for impact analysis (e.g., trip generation calculations).

The ultimate operator of the Residential Care for the Elderly (RCFE) Building or the Program of All-Inclusive Care for the Elderly (PACE) facility is not germane to the issue of the lead agency role or the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. As the lead agency, BCHD would be responsible for ensuring that implementation of mitigation measures occurs in accordance with the Mitigation, Monitoring, and Reporting Program (MMRP) in accordance with CEQA Guidelines 15097. A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

Comment RR7-6

The comment states that the eventual project will be privately owned and operated and for that reason asserts that BCHD cannot be the lead agency. BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities.

The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. However, as described in Master Response 2 – BCHD as Lead Agency, the proposed Project would still be approved and implemented, hence, carried out, by BCHD. For example, the BCHD Board of Directors has the responsibility for approving the proposed Healthy Living Campus Master Plan and implementing the proposed development, including approval of building demolition, construction of new buildings and associated improvements, and operation of the community health facilities, all in compliance with the proposed Healthy Living Campus Master Plan and State law.

Comment RR7-7

The comment asserts that BCHD is an agency with a single or limited purpose and cites CEQA Guidelines Section 15051(b)(1). However, this subdivision only applies to projects that are “*carried out by a nongovernmental person or entity.*” Refer to the response to Comment RR7-6 and Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

Comment RR7-8

The comment asserts that the City of Redondo Beach is the only viable entity, which could serve as the lead agency for the proposed Project. However, as described in the response to Comment RR7-6 and Master Response 2 – BCHD as Lead Agency, the proposed Project would still be approved and implemented, hence, carried out, by BCHD. For example, the BCHD Board of Directors has the responsibility for approving the proposed Healthy Living Campus Master Plan and implementing the proposed development, including approval of building demolition, construction of new buildings and associated improvements, and operation of the community health facilities, all in compliance with the proposed Healthy Living Campus Master Plan and State law. As described in Master Response 2 – BCHD as Lead Agency there is no dispute between BCHD and any other agency with regard to which agency should be the lead agency to prepare the Draft EIR for the proposed Project; neither the City of Redondo Beach nor the City of Torrance have asserted lead agency status.

Comment RR7-9

The comment restates its assertion that BCHD cannot serve as the lead agency and suggests that BCHD serving as the lead agency circumvents Measure DD. Refer to the response to Comment RR3-14 and Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to these issues.

Comment RR7-10

The comment states that BCHD omits approvals that are required from the City of Torrance. However, contrary to this assertion, the approvals required from the City of Torrance are described in Section 1.5, *Required Approvals* and include:

- City Engineer approval of improvements to curbs, gutters, sidewalks, driveways, and construction of retaining walls associated with the one-way driveway and pick-up/drop-off zone as well as the service and loading dock entrance along Flagler Lane pursuant to Torrance Municipal Code (TMC) Section 74.3.2 and 74.3.4 (Torrance Engineering Division)
- Grading Permit pursuant to TMC Section 81.2.49 (Torrance Engineering Division);
- City Engineer approval of a building permit for retaining walls associated with the service area and loading dock entry/exit pursuant to TMC Section 92.13.2 (Torrance Engineering Division).
- Landscape Plan approval pursuant to TMC Section 92.30.6 (Torrance Community Development Department)

Letter RR8

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR8-1

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR8-2

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also notes that public participation is “an essential part of the CEQA process” (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and

asserts that for these reasons it must be withdrawn. Responses to individual assertions related to Section 1.0, *Introduction*, Section 2.0, *Project Description*, Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, and Section 5.0, *Alternatives* are provided in detail in the responses to Comment RR8-3 and RR8-13.

Comment RR8-3

The comment describes that BCHD is required to locate hazards, discuss their relationship to the proposed Project, and identify alternatives. The comment goes on to identify the previously plugged and abandoned oil and gas well. However, the comment incorrectly asserts that BCHD has not made full and proper efforts to locate the well. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue. As described therein, in September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to Mitigation Measure (MM) HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM’s Well Review Program and compliance with CalGEM’s advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

Comment RR8-4

The comment asserts that the proposed Project would be constructed over a toxic waste site. Refer to Master Response 11 – Hazards and Hazardous Materials for a detailed discussion and response to comments pertaining to this issue. As described in Section 3.8.1, *Environmental Setting*, BCHD has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered tetrachloroethylene (PCE) contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the Certified Unified Program Agency

(CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup. Although previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the BCHD campus have not experienced vapor intrusion from subsurface contamination, development would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatilized PCE through carbon filters before outgassing the vapor at a controlled rate. Because PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

Comment RR8-5

The comment asserts that the description of seismic hazards provided in the EIR is incomplete and probably deceptive. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. As described in Section 2.1, *Introduction* and Section 2.4.2, *Project Background*, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This Beach Cities Health District Seismic Assessment is referenced in the EIR in Section 7.0, *References* and is publicly available at https://www.bchdcampus.org/sites/default/files/archive-files/January-2018-Nabih-Youssef-and-Associates-Presentation_CWG.pdf. This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the Beach Cities Health District Seismic Assessment and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance

building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). For example, as described, as described in Section 3.6, *Geology and Soils*, “[t]he Beach Cities Health Center, formerly the South Bay Hospital, is a 60-year-old, non-ductile concrete building. The original 4-story (north) tower was constructed in 1958 and the 4-story addition (south tower) was constructed in 1967. Both of these towers were constructed with non-ductile concrete roofs, floors, and poorly reinforced columns, making them susceptible to collapse in the event of an earthquake.” These buildings were designed and constructed in conformance with building code requirements at the time of construction; however, the building code requirements have since evolved substantially based on research, best practices, and experience from previous earthquakes. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Comment RR8-6

The comment cites CEQA Guidelines Sections 15020 and 15021 and asserts that BCHD knowingly released a deficient document. This assertion is unsubstantiated and unfounded. The EIR meets the standards for adequacy described in CEQA Guidelines Section 15151, which describe that “an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

Comment RR8-7

The comment restates issues related to the previously abandoned oil and gas well, which are addressed in the response to Comment RR8-3 and Master Response 11 – Hazards and Hazardous Materials. The comment also briefly restates the assertion that the proposed Project would be

located on a toxic waste site. The issue of existing PCE contamination is addressed in Comment RR8-4 and Master Response 11 – Hazards and Hazardous Materials.

Comment RR8-8

The comment provides a lengthy overview of the issues related to the previously abandoned oil and gas well on the vacant Flagler Lot, beginning with the acquisition of the vacant Flagler Lot through to the preparation of the Phase I and Phase II Environmental Site Assessments (ESAs) as well as the additional activities to identify the precise location of the well. The comment asserts that the precise location of the previously abandoned oil and gas well is unknown must be identified because it affects the design of the proposed Project. However, as described in the response to Comment RR8-3 as well as Master Response 11 – Hazards and Hazardous Materials, in September of 2020, Terra-Petra conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the CalGEM Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM’s Well Review Program and compliance with CalGEM’s advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

Comment RR8-9

The comment restates issues related to PCE and cites the Phase II ESA that described the results of the soil borings collected on the BCHD campus and the vacant Flagler. The comment asserts that these hazardous substances could cause serious injury or death as a result of the proposed Project. However, while the comment provides a thorough summary of the Phase II ESA results, it fails to acknowledge the environmental impact analysis or mitigation measures provided in the EIR that provide context around the results and industry standard mitigation measures that would be effective in reducing risk – particularly for construction workers – to a level that is less than significant. Most notably, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the CAA limits and OSHA exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create

a hazardous impact to the surrounding environment. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Refer to Master Response 11 – Hazards and Hazardous Materials, which provides a detailed discussion and response to comments pertaining to the issue of on-site contamination.

Comment RR8-10

The comment cites one of the project objectives related to seismic safety and asserts that it is a false statement used to justify the purpose of the proposed Project. As described in the response to Comment RR8-5 and Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Comment RR8-11

The comment asserts that BCHD discriminates between occupants of the Beach Cities Health Center and the two other medical office buildings. As described in the response to Comment TRAO-8, construction has been phased as proposed because the more substantial geotechnical issues were identified in the 4-story Beach Cities Health Center, which is nearly a decade older and more susceptible to future structural stability issues in the event of an earthquake than the Beach Cities Advanced Imaging Building. Additionally, the Beach Cities Health Center includes Memory Care units that are occupied 24 hours per day.

Comment RR8-12

The comment cites that the proposed Project is an indefinite, uncertain, and speculative way to address seismic safety and suggests the use of reserves or reductions in expenses. As described in the response to Comment TRAO-9,

the project objective to eliminate seismic safety issues is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, *Project Description*, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies.

Other potential solutions for addressing the seismic retrofit are discussed in Section 5.0, *Alternatives*. As described therein, under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit.

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing BCHD campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

Comment RR8-13

The comment restates the assertion that BCHD presents the seismic issue as if it were a new, immediate, and unexpected problem and cites an article from the *Los Angeles Times*, which cites

the results of a seismic report as one of the reasons the South Bay Board voted to close the former South Bay Hospital. The comment fails to acknowledge that BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD's community health and wellness programs and services.

Comment RR8-14

The comment asserts that the EIR is invalid and should be withdrawn. However, contrary to this assertion, as described in the responses to Comment RR8-3 through RR8-13, the description of the proposed Project and the impact analysis provided within the EIR is consistent with the requirements of CEQA.

Letter RR9

June 4, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR9-1

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR9-2

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also notes that public participation is “an essential part of the CEQA process” (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to the purpose and need and project objectives referenced are provided in detail in the responses to Comment RR9-3 and RR9-17.

Comment RR9-3

The comment cites CEQA Guidelines Section 15124(b), which states that the “statement of objectives should include the underlying purpose of the project...” The comment goes on to assert the statement of objectives in the EIR is misleading. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives described in the EIR.

Comment RR9-4

The comment asserts that the EIR attempts to play on the fears of the reader by listing seismic safety as a project objective. However, contrary to this unsubstantiated assertion, the project objectives do no such thing. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

The comment also fails to acknowledge that BCHD’s ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its

seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD's community health and wellness programs and services.

The comment goes on to incorrectly states that the proposed Project remains in the realm of pure speculation, because all portions of the proposed Project are currently conceptual. As described in the response to Comment RR7-3, pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1116 proposed developments in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details (i.e., specific building colors, siding, windows, and other building materials) cannot be finalized at this time. While the Planning Commission Design Review could also further limit floor area ratio (FAR), building height, setbacks, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

The comment goes on to assert that seismic issues can be easily and better addressed without the proposed Project. As described in the response to Comment RR8-12, other potential solutions for addressing the seismic retrofit are appropriately discussed in Section 5.0, *Alternatives*.

Comment RR9-5

The comment states that the term center of excellence is undefined. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. As described in Section 2.4.3, *Project Objectives* one of the project pillars is to build a center of excellence focusing on wellness, prevention, and research. The term center of excellence generally refers to a modern campus with public open space and facilities designed to meet the future community health and wellness needs of residents in alignment with BCHD's mission.

Comment RR9-6

The comment states that BCHD does not provide specific numbers to further define sufficient revenue. While the CEQA states that an EIR should provide a description of the project, including

a “...general description of the project’s technical, economic, and environmental characteristics,” the lead agency is not required “...supply extensive detail beyond that needed for evaluation and review of the environmental impact” (CEQA Guidelines Section 15124). However, with regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD’s mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs.

Comment RR9-7

The comment simply restates the objectives provided in Section 2.4.3, *Project Objectives*.

Comment RR9-8

The comment asserts the proposed Project ignores fixing known safety issues. It goes on to state that there is no legal requirement that any seismic safety issue be addressed through the proposed Project. Refer to the response to Comment RR9-4 as well as Master Response 3 – Project Need and Benefit.

Comment RR9-9

The comment asserts there are two buildings identified as candidates for seismic retrofits, but only the Beach Cities Health Center is prioritized. As described in the response to Comment TRAO-8 and RR8-11, construction has been phased as proposed because the more substantial geotechnical issues were identified in the 4-story Beach Cities Health Center, which is nearly a decade older and more susceptible to future structural stability issues in the event of an earthquake than the Beach Cities Advanced Imaging Building. Additionally, the Beach Cities Health Center includes Memory Care units that are occupied 24 hours per day.

Comment RR9-10

The comment incorrectly claims that the proposed Project is conceptual. As described in the response to Comment RR7-3, pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1116 proposed developments in P-CF zones are subject to Planning Commission Design Review. Therefore, the design details (i.e., specific building colors, siding, windows, and other building materials) cannot be finalized at this time. While the Planning Commission Design Review could

also further limit floor area ratio (FAR), building height, setbacks, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

Comment RR9-11

The comment restates that there is no legal requirement to solved the current seismic issues. Refer to the response to Comment RR9-4 for a detailed discussion and response to this issue.

Comment RR9-12

The comment restates the assertion that there are other options available to BCHD to address the seismic issues. However, it should be noted that the elimination of seismic hazards is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, Project Description, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. However, BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. The combined cost of renovation and seismic retrofit would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. This issue is also discussed in Section 5.0, *Alternatives* as a part of the rationale for the development of Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) as well as Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus.

Comment RR9-13

The comment restates the assertion that BCHD presents the seismic issue as if it were a new, immediate, and unexpected problem and cites an article from the *Los Angeles Times*, which cites the results of a seismic report as one of the reasons the South Bay Board voted to close the former South Bay Hospital. As described in the response to Comment RR8-13, the comment fails to acknowledge that BCHD's ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs,

independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD's mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. As such, the proposed Project includes demolition of the Beach Cities Health Center in Phase 1 and potentially the demolition of the Beach Cities Advanced Imaging Building in Phase 2 to accommodate a new modernized, seismically sound Healthy Living Campus that would attract and better suit mission-oriented building tenants, while also generating sufficient revenue to support BCHD's community health and wellness programs and services.

Comment RR9-14

The comment claims that the EIR does not address a basic seismic retrofit. However, contrary to this assertion, Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space*, clearly does describe a local bond measure and seismic retrofit. As described therein, under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

Comment RR9-15

The comment states that the EIR does not establish a seismic safety purpose for the proposed Project, claims that there are no specifics about a center for excellence, and again incorrectly suggests that that proposed Project is conceptual. These issues are discussed in detail in the responses to Comment RR9-4 and RR9-5 as well as Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives.

Comment RR9-16

The comment claims without any substantiating evidence that financial failure of the proposed Project is inevitable. For a detailed discussion and response to comments on such issues refer to Master Response 6 – Financial Feasibility/Assurances. This comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Although these comments do not address the adequacy of the EIR, as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR9-17

The comment states that BCHD will have a minority interest in the proposed Project and questions where the money will come from and at what cost. The comment asserts that the private entity will have complete control over BCHD’s future and fate. This comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” While not relevant to the adequacy of the EIR, it should be noted that BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services.

Comment RR9-18

The comment asserts that the EIR is invalid and should be withdrawn. However, contrary to this assertion, as described in the responses to Comment RR9-3 through RR9-17, the description of the proposed Project and the impact analysis provided within the EIR is consistent with the requirements of CEQA.

Letter RR10

June 5, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR10-1

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR10-2

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also notes that public participation is “an essential part of the CEQA process” (CEQA Guidelines Section 15201). The comment goes on to claim that the EIR is factually and legally deficient and asserts that for these reasons it must be withdrawn. Responses to individual assertions related to the secondary impacts are provided in detail in the responses to Comment RR10-3 and RR9-7.

Comment RR10-3

The comment incorrectly claims that the EIR ignores secondary impacts and cites the length of discussion in Section 4.3, *Significant Irreversible Environmental Changes*. The content for this section of the EIR is specifically defined in CEQA Guidelines Section 15126.2, which states:

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. (See

Public Resources Code section 21100.1 and Title 14, California Code of Regulations, section 15127 for limitations to applicability of this requirement.)”

Project specific impacts related to air quality, noise, vibration, air quality, hazardous materials are addressed in detail within Section 3.1, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, and Section 3.11, *Noise*. Each of these analyses address direct and indirect impacts, residual impacts following the implementation of required mitigation measures, and cumulative impacts.

Comment RR10-4

The comment claims that issues related to safety and noise and vibration on school children were ignored. However, contrary to this assertion, as described in the response to Comment RR10-2, noise and vibration impacts to sensitive receptors – including schools – were thoroughly addressed in Section 3.11, *Noise*. Additionally, potential safety issues were addressed in Section 3.8, *Hazards and Hazardous Materials* as well as Section 3.14, *Transportation*.

Comment RR10-5

The comment raises the issue of potential impacts of particulates and noise on sensitive receptors including Towers Elementary School and elderly individual living in the residential areas surrounding the Project site. Contrary to the assertion that these issues have been overlooked, each has addressed in extensive detail, with findings supported by exhaustive quantitative modeling, in Section 3.2, *Air Quality* and Section 3.11, *Noise*.

Comment RR10-6

The comment incorrectly states that the previously plugged and abandoned oil and gas well has not been addressed. Contrary to that assertion, this issue has been the subject of Phase I and Phase II Environmental Site Assessments (ESAs) as well as various follow up actions, including excavation of the previously plugged and abandoned oil and gas well to identify its precise location. This issue as well as issues related to the potential for upset, are thoroughly addressed in Section 3.8, *Hazards and Hazardous Materials*.

Comment RR10-7

The comment states that there would be an increase in water consumption of millions of gallons per year and without any substantiating evidence questions the finding that no public water main upgrades would be required. As described in Section 3.15.1.1, *Environmental Setting – Water Infrastructure and Supply*, Cal Water has concluded that the Hermosa-Redondo District will have adequate water supplies to meet projected demands under normal, single dry year, and multiple

dry year conditions through the year 2040. Additionally, as described under Impact UT-1, Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the California Public Utilities Commission (CPUC). No upgrades to public water mains would be needed under the proposed Project. Cal Water's potable water system has the infrastructure and the capacity to serve the proposed Project.

Letter RR11

June 6, 2021
Robert R. Ronne
Post Office Box 3211
Redondo Beach, California 90277

Comment RR11-1

This comment identifies the correct process for submitting comments on the Draft Environmental Impact Report (EIR), which has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). These comments have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment RR11-2

The comment summarizes the purposes of the CEQA process including that requirement that “[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation” (CEQA Guidelines Section 15126). The comment also notes that public participation is “an essential part of the CEQA process” (CEQA Guidelines Section 15201).

The incorrectly states that comments submitted on the Draft EIR have been ignored. CEQA Guidelines Section 15204 defines the suggested focus of the review:

“In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude

of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

Nevertheless, all comments that have been received on the Draft EIR, even comments that simply express general opposition to the proposed Project (refer to Master Response 1 – General Opposition to the Proposed Project) have been incorporated into the Final EIR as a part of the responses to comments and will be advanced to decision makers for further consideration during deliberations on the proposed Project. The assertion that the EIR must be withdrawn and ignored is unsubstantiated.

Letter RR12

June 9, 2021
Robert R. Ronne

Comment RR12-1

This comment describes that 11 individual comment letters have been submitted on the Draft EIR from Robert Ronne. Each of these comment letters on the Draft EIR have been received, incorporated into the Final EIR as a part of the response to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project. Refer to the individual responses to Letter RR1 through Letter RR11.

8.3.5 Form Letters

Letter FL1

Comment FL1-1

The comment provides a table of contents summarizing each of the comments, which are responded to in detail individually below.

Comment FL1-2

The comment presents a screenshot of a written communication from Beach Cities Health District (BCHD) legal counsel describing the benefits of the proposed Project to the City of Redondo Beach. The comment goes on to state that the MDS Research Company, Inc. study assumes less

than 5 percent of the Assisted Living residents would be from south Redondo Beach. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD’s broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

Comment FLI-3

As described in Master Response 10 – Air Quality Analysis, an exhaustive air quality modeling effort was conducted to evaluate construction and operational air emissions associated with the proposed Project. While second hand smoke may be locally regulated, it is not emitted in substantial quantities or for such a duration that that it would result in long-term health impacts to adjacent sensitive receptors. Nevertheless, BCHD is and would continue to be responsible for complying with Ordinance No. 0-3193-19. Noncompliance with this ordinance or any other local ordinance or regulations could be subject to enforcement action from the relevant regulatory agencies.

Comment FLI-4

The comment claims that financing for the proposed Residential Care for the Elderly (RCFE) Building is forbidden under governing law. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. For decades, BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. It should also be noted that at least one other California Health District – the Salinas Valley Memorial Hospital District – also operates 72 assisted living beds (see the Salina Valley Memorial Hospital District website here: <https://www.svmh.com/about-us/affiliates-partnerships/>).

Comment FLI-5

The comment claims that the proposed development does not conform to the same conditions that were described for the Kensington Senior Living Project. The comment states that the proposed Project is not consistent with the type of adjacent land uses as it would be developed and operated by a third-party adjacent to surrounding single- and multi-family uses. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. For decades, BCHD, which is a California Healthcare District, has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter the use of the BCHD campus, which would continue to provide needed community health and wellness programs and services, including needed senior housing. Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted in P-CF zones with a conditional use permit (CUP). A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory Care Community. The proposed Project – like other improvements made on the BCHD campus in the past – would require a CUP that would be issued under the existing code. As described in RBMC Section 10-2.1116, the floor area ratio (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes.

Comment FLI-6

The comment asserts that the proposed development is not consistent with the character of the adjacent residential land uses. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to commenters pertaining to visual character. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would comply with the required building height prescribed in RBMC Section 10-2.622 and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives.

Beyond the subjective assertion that the building is not consistent with the character of the adjacent residential land uses the comment does not challenge any specific aspects of the analysis of visual character presented under Impact VIS-2 or provide any substantiating evidence to further support its assertion.

Comment FLI-7

The comment asserts that BCHD is proposing a commercial use that no assessment of quantifiable benefit. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. Refer also to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. As described in the response to Comment FLI-6, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter the use of the BCHD campus, which would continue to provide need community health and wellness programs and services, including needed senior housing. The proposed Project would continue the existing model to reinvest revenue into community services such as senior care and health programs. A quantitative analysis of BCHD’s services can be found in the Community Health Report (<https://www.bchd.org/healthreport>) as well as the Priority-Based Annual Budgets (<https://www.bchd.org/operating-budgets>).

Comment FLI-8

The comment states that BCHD requires a CUP pursuant to the P-CF zoning requirements and cites specific requirements of the CUP ordinance. The EIR acknowledges that pursuant to RBMC Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted on P-CF zones with a CUP. Further, the EIR acknowledges that the FAR, building height, number of stories, and setbacks of development, etc. in P-CF zones are subject to Planning Commission Design Review pursuant to RBMC Section 10-2.1116.

RBMC 10-2.2506 sets out the purpose of a CUP and the criteria that would be evaluated during the Planning Commission Design Review. However, these criteria provided in RBMC 10-2.2506 do not set specific quantitative limits for each individual criterion. These determinations are subject to the discretion of the City’s Planning Commission.

Comment FLI-9

The comment asserts that the surrounding properties and the perceived quiet environment would be impacted by the proposed Project. The comment goes on to claim that the proposed Project would result in: 1) privacy invasion; 2) reflected noise; 3) reflected light and glare; 4) direct noise; 5) construction; and 6) related traffic and pollution. It also asserts that students at Towers Elementary would be impacted by fine particulate matter (PM_{2.5}) and suspended particulate matter (PM₁₀) emissions as well as intermittent noise and vibration from heavy construction traffic. The comment claims that these construct-related impacts could result in disturbances to cognitive function and development as well as educational progress. However, the comment fails to acknowledge that each of these issues is addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. Further, as described in Section 3.2, *Air Quality* and Section 3.11, *Noise*, the exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would neither be significantly impacted by construction-related air emissions nor construction-related noise and vibration.

Comment FLI-10

The comment asserts that the proposed Project must incorporate: 1) increased setbacks; 2) reduced structure heights; 3) perimeter structures that do not exceed the design guidelines and height limits of adjoining uses and properties (generally 30-feet or less), perimeter landscaping that hides the proposed development etc. The comment fails to acknowledge that while RBMC 10-2.2506 references and considers setbacks, opens spaces, and buffers it does not prescribe specific distances, areas, or other measures. Additionally, as described in Master Response 9 – Aesthetics and Visual Resources Analysis, the comment fails to acknowledge that the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which already provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street. Additional setbacks, reductions in building heights, etc. would be considered as a part of the Planning Commission Design Review for the proposed Project, which would be required pursuant to RBMC Section 10-2.1116.

Comment FLI-11

The comment claims that the proposed PACE facility is duplicative with existing PACE the same area, providing a marginal benefit to the Beach Cities. However, as described further in Master Response 3 – Project Benefit and Need, there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; there are currently no PACE programs located

in any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

Comment FL1-12

The comment claims that the use of the PACE facility – including the use of vans or buses to bring participants to the facility – would increase traffic and increase PM_{2.5} and PM₁₀ exposure to students at Towers Elementary School. However, the comment fails to acknowledge the exhaustive quantitative modeling effort provided in support of the EIR. As described in Impact AQ-3, the results of this effort demonstrate that operational criteria air pollutant emissions, including mobile source emissions associated with vehicle trips to and from the Project site, would not exceed the South Coast Air Quality Management District’s (SCAQMD’s) localized significance thresholds (LSTs), which account for potential human health effects from criteria air pollutants. The claim that vehicle travel to and from the Project site would result in Alzheimer’s like symptoms and delayed development is unsubstantiated and unfounded.

The comment goes on to claim that the parking structure entrance in Phase 2 of the proposed Project is inconsistent with the existing use at the intersection of North Prospect Avenue & Diamond Street. However, the comment fails to acknowledge that the EIR does not identify any design hazards associated with the use of the existing driveway for this purpose. Also, while no longer a California Environmental Quality Act (CEQA) issue pursuant to Senate Bill (SB) 743 and CEQA Guidelines 15064.3, the implementation of the proposed Project would not result in substantial increases in volume-to-capacity (V/C) ratios or vehicle delays at any of the three existing driveways along North Prospect Avenue or the intersection of North Prospect Avenue & Diamond Street (refer to Appendix M). This is because vehicles would travel to and from the Project site throughout the day and would not be concentrated around the peak hours. In fact, even with the implementation of Phase 2, there would still be a minor reduction in AM and PM peak hour vehicle trips. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to trip generation associated with the proposed Project.

Comment FL1-13

The comment restates the claim that the proposed Project would have an adverse impact on abutting properties. Refer to the response to Comment FL1-10, which addresses comments regarding the CUP ordinance.

Comment FLI-14

The comment states that construction traffic must be denied the path down Beryl Street from Flagler Lane to West 190th Street. As described in Master Response 13 – Transportation Analysis, in response to comments from Torrance Unified School District (TUSD) and the City of Torrance, the proposed haul routes have been revised in the Final EIR as follows:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from Flagler Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards Interstate (I-) 405.
- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesia Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.
- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

BCHD has incorporated these suggested revisions in keeping with Mitigation Measure (MM) T-2, which requires that the proposed haul routes are “...consistent with the Redondo Beach and Torrance General Plan designations.”

Comment FLI-15

This comment provides a table showing the relative height of the proposed RCFE Building and the proposed development in Phase 2 as compared to adjacent properties based on topographical data purportedly from the U.S. Geological Survey (USGS). The comment goes on to incorrectly claim that the CUP cannot allow the proposed development due to these height difference. There are no provisions in the RBMC that would prohibit the City of Redondo Beach for issuing a CUP for the proposed Project. The proposed Project would be consistent with RBMC Section 10-2.622, which includes maximum height limits along with other development standards for the C-2 zone designation that governs the vacant Flagler Lot. The RBMC does not specify building heights or FARs for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). Refer to Master Response 9 – Aesthetics and Visual

Resources Analysis for additional discussion and response to comments pertaining to building height and visual character.

Comment FL1-16

The comment recognizes that the original BCHD campus opened in 1960, but specifies that it was opened as an emergency hospital providing lifesaving services to the surrounding neighborhood. The comment goes on to assert that BCHD intends to import tenants from outside of the 90277 zip code and that the Beach Cities are already served by PACE. For a detailed discussion and response to comments pertaining to the benefits of the proposed Project refer to Master Response 3 – Project Need and Benefit. First, it should be noted that it is highly unlikely that the original South Bay hospital only served the 90277 zip code. Hospitals (and health districts) generally do not provide benefits to a single zip code or neighborhood and instead provide these benefits to a wider community. Three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach specifically identify that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. It should also be noted that revenue generated by the uses under Phase 1 – including the proposed Assisted Living program – would support BCHD’s broader range of community health programs and services provided to the Beach Cities and the nearby South Bay communities. Refer also to the response to Comments to FL1-11 regarding the need for PACE in the Beach Cities.

Comment FL1-17

The comment restates a public records request for a benefits analysis. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments related to the benefits of the proposed Project. As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach, and Manhattan Beach as well as tens of thousands within nearby South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. BCHD expended considerable time and effort researching and evaluating anticipated community health needs in the coming decades, particularly with regard to senior care. The need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, the need for the proposed Project has been discussed in detail at

numerous well-noticed public hearings. After careful consideration of projected community health needs over the coming decades, the BCHD Board of Directors identified the proposed Project as a key component to addressing future community health needs and drafted a set of project objectives, which helped define those health needs and project benefits which guided project design. As described in CEQA Guidelines Section 15093, “*CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project.*” If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall “*...state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record*” (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

Comment FLI-18

The comment asserts that based on BCHD’s response to a California Public Records Request, 85 percent of the COVID-19 tests conducted at the BCHD campus were conducted for non-residents. The comment goes on to assert that BCHD has no data to demonstrated local benefits compared to negative Environment Justice impacts. Although not germane to the adequacy of the EIR, it should be noted that even if the uncited assertion that 85 percent of the COVID-19 test conducted at the BCHD campus were for South Bay residents located outside of the 90277 were to be accurate, these tests would have unquestionably had a beneficial public health impact for the region, including residents within the 90277 zip code.

With regard to the claim that the proposed Project would result in negative Environmental Justice impacts it should be noted that according to California Office of Environmental Health Hazard Assessment (OEHHA) CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. This ranking is based on specific categories such as pollutant exposure, environmental effects, sensitive populations, and socioeconomic factors. While not specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

Comment FLI-19

The comment claims that BCHD data cannot quantify any benefits to the 90277 and 90278 zip codes that would experience 100 percent of the Environmental Justice impacts. Refer to the response to Comments FL1-17 and FL1-18 for a detailed discussion and response to comments pertaining to these issues.

Comment FLI-20

The comment identifies and describes seven parcels within the City of Redondo Beach that have a P-CF (Community Facility) zoning and land use designation. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

Comment FLI-21

The comment asserts that neither the existing BCHD campus, nor the development described under the proposed Health Living Campus Master Plan comply with the RBMC requirements for issuance of a CUP. Refer to Comment FL1-9 for a detailed discussion and response to comments regarding this issue. Refer also to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

Comment FLI-22

The comment incorrectly claims that BCHD must dedicate all open land to unrestricted public use or a CUP cannot be issued. As described in the response to Comment TRAO-14, the proposed Project would substantially expand open space on the existing BCHD campus, including 114,830 sf of programmable open space within the interior of the Project site. The central lawn would be sized to accommodate a variety of outdoor community events such as movie nights or group fitness activities. Contrary to the assertion in the comment, the open space would not be privately owned or otherwise cordoned off for security purposes.

Comment FLI-23

The comment incorrectly claims that BCHD fails to provide an accurate, stable, and finite project description. The comment asserts that Phase 2 has multiple descriptions denying the public the right to intelligent participation. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, regarding the approach to the programmatic analysis of the

Phase 2 development program. The analysis of the proposed Phase 2 development program meets the requirements of CEQA Guidelines Section 15165. The comment also asserts that BCHD ignores laws and ordinances and that no codes or ordinances require demolition of the Beach Cities Health Center. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Comment FLI-24

The comment claims that the analysis of alternatives provided in the EIR is inadequately developed and flawed. The comment asserts that the analysis of the No Seismic Retrofit alternatives cites a false narrative of terminating leases to implement a retrofit. As described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. As described in Section 5.0, *Alternatives*, the No Seismic Retrofit alternative would involve interior renovation of the Beach Cities Health Center, including demolition of interior walls, upgrades to existing electrical and plumbing systems, and reconfiguration of interior space to better accommodate potential tenants. The interior renovation of the Beach Cities Health Center would address other existing maintenance issues (e.g., outdated electrical and plumbing systems) and would provide space configurations that would be better suited for potential tenants; however, given the extent of the building-wide upgrades, this alternative would require BCHD to end or temporarily suspend many of its existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. It is possible that some portions of the building may continue to be operable during individual phases of construction (e.g., when construction is occurring in the North Tower, portions of the South Tower may still be operable). However, existing medical office space could not be reasonably considered to continue uninterrupted throughout the entire construction period. Additionally, it would not be possible for the existing Silverado Beach Cities Memory Care Community to continue with care and treatment in such

conditions. The EIR acknowledges that the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission (refer to Section 2.4.2, *Project Background*). Revenues from the long-term tenant leases support BCHD community health programs and services, such as the Community Services program, the CHF, and the Beach Cities Partnership for Youth. This substantial loss of revenue during the extensive interior renovation would exacerbate existing substantial reductions in BCHD program offerings. It should also be noted that this alternative would not meet any of the project objectives (e.g., providing public open space to accommodate community health programs).

Comment FL1-25

The comment claims that the EIR failed to consider an appropriate No Project Alternative. The comment claims that if demolition is voluntarily elected, the mitigation for associated impacts should be the establishment of a taxpayer-owned community garden. The comment attempts to support this assertion with a claim that BCHD was not voter approved and that the Assisted Living program included in the proposed Project would serve non-residents. The comment envisions a community garden that would be developed and maintained by the revenues from the two remaining medical office buildings. (However, the comment provides no substantiating information demonstrating that this would be a financially feasible or reasonably foreseeable outcome of not implementing the proposed Health Living Campus Master Plan.) The comment goes on to state that as each medical office building comes to the end of their lease, the comment suggests that the buildings can be demolished and their footprints can be added to the community garden. The comment acknowledges that this would result in a substantial downsize in staff and operations, with BCHD becoming a property management and financial grant entity. The comment notes that if the BCHD charter could not be legally amended to support this change in its mission, BCHD would be dissolved, a three city community garden established, and BCHD assets would liquidated and put into a non-wasting trust to maintain the community garden.

First, with regard to the assertions that demolition would result in Environmental Justice impacts, refer to the response to Comment FL1-18. According to OEHHA CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. While not specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

With regard to the scope of the No Project Alternative, CEQA Guidelines Section 15126.6(e)(2), “[t]he ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing BCHD campus would not be redeveloped. BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would continue to operate the facilities (to the extent that it was financially feasible) before eventually addressing the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves. Following the demolition, BCHD would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This

description of what is “*reasonably expected to occur in the foreseeable future*” clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing BCHD campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

While BCHD does support programs related to healthy eating choices and other preventative health care measures, the mission of BCHD focuses on broad health and wellness services for residents in the Beach Cities and the nearby South Bay communities. The formation of a Community Garden Association does not directly fit within BCHD’s mission to offer an extensive range of dynamic health and wellness programs, with innovative services and facilities to promote health and prevent diseases across the lifespan.

Comment FLI-26

The comment asserts that the by presenting example Phase 2 site plans, the EIR fails to provide an accurate, stable, and finite project description. For a detailed discussion and response to comments pertaining to the programmatic analysis of Phase 2 refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis. The EIR evaluates the potential physical environmental impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. The complete description of both the Phase 1 preliminary site development plan and the Phase 2 development program is provided in Section 2.5, *Proposed BCHD Healthy Living Campus Master Plan*, and is based upon the published version of the Healthy Living Campus Master Plan prepared by Paul Murdoch Architects under

the direction of the Beach Cities Health District (BCHD). The Healthy Living Campus Master Plan is publicly available here: <https://www.bchdcampus.org/campus>.

Guidance on the preparation of EIRs that analyze projects at both a project level of detail, and a programmatic level of detail is provided under Article 11 of CEQA Guidelines. Specifically, CEQA Guidelines Section 15160 states that there are “...a number of examples of variations in EIRs as the documents are tailored to different situations and intended uses. These variations are not exclusive... [and] Lead Agencies may use other variations consistent with the Guidelines to meet the needs of other circumstances.” A project EIR is defined as “[a] type of EIR [that] should focus primarily on the changes in the environment that would result from the development project” (CEQA Guidelines Section 15161), while a program EIR is defined as “...an EIR which may be prepared on a series of actions that can be characterized as one large project and are related...” (CEQA Guidelines Section 15168). Generally, a program EIR analyzes a project for which less specific detail is currently known, but would be developed at a later date. If, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “tiered” CEQA analysis of the proposed Phase 2 improvements, as needed, which would involve “...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Such is the case for Phase 2 of the proposed Project, for which a single detailed preliminary site development plan and construction information has not yet been developed. This is due to two primary factors: 1) as described in Section 2.0, *Project Description*, the Phase 2 development program would be implemented at least 5 years after the development under Phase 1; and 2) the programming in Phase 2 and the associated development is intended to respond to the Community Health Report and priority-based budgeting efforts to meet constantly evolving community health and wellness needs in the Beach Cities and the nearby South Bay communities. As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus

Master Plan. This approach is often used by lead agencies – including local municipalities – when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans existing for later improvements. There are several advantages that can be attributed to this approach, including allowing for “...*the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts*” (CEQA Guidelines Section 15168[b][4]). In the event that later “*tiered*” analysis is determined necessary for the Phase 2 improvements, the lead agency “...*shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program*” (CEQA Guidelines Section 15168[c][3]).

Comment FLI-27

The comment contests the need for the proposed PACE services, stating that all of the zipcodes of BCHD and all surrounding zip codes are already served by PACE. The comment goes on to provide additional financial overview information, which appears to be excerpted from the Cain Brothers study. Refer to Master Response 3 – Project Need and Benefit to a detailed discussion and response to comments regarding the purpose and need for the proposed PACE services. BCHD has conducted exhaustive research regarding assistance for seniors who choose to remain in their own home, but require substantial support to do so. In fact, several commenters voicing opposition to the Assisted Living program component of the proposed Project have cited this need. As described in Section 2.0, *Project Description*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services to older adults – involving a combination of adult day care center services and in-home care services. PACE is intended to allow older adults to remain in the community rather than receive care in an Assisted Living facility. As described in Section 2.0, *Project Description* and as shown on the National PACE Association website, there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located in any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

Aside from the need for PACE services discussed above, these comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation*

and review of the environmental impact” (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

Comment FLI-28

The comment asserts that the purpose and need for the proposed RCFE Building is invalid based on the MDS market study. For a detailed discussion and response to comments pertaining to these issues refer to Refer to Master Response 3 – Project Need and Benefit, Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, and Master Response 6 – Financial Feasibility/Assurance.

Aside from the general purpose and need for RCFE Building, which are addressed in the master responses, these comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

As described in CEQA Guidelines Section 15093, “*CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project.*” If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall “...*state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record*” (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

Comment FLI-29

The comment restates that there are no laws or ordinances that require any retrofit or demolition of the Beach Cities Health Center. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities

Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

Comment FLI-30

The comment asserts that BCHD has no program budgets, cost-accounting, or benefits assessment and therefore cannot assert any of its programs provide benefits above its costs to residents of the Beach Cities. Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potential physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. CEQA does not require an exhaustive quantification of the value that BCHD provides to the community within the EIR. Nevertheless, a quantitative analysis of BCHD’s services can be found in the Community Health Report (<https://www.bchd.org/healthreport>) as well as the Priority-Based Annual Budgets (<https://www.bchd.org/operating-budgets>).

Comment FLI-30

The comment states that BCHD does not provide evidence that the proposed Assisted Living program would result in benefits to the Beach Cities. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The MDS market study identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. The comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD’s broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

Comment FL1-31

The comment states the project objectives considered in the EIR are overly restrictive. However, as discussed in Master Response 4 – Project Objectives, the project objectives directly reflect BCHD’s primary mission to support community health and wellness by providing needed housing and long-term care to seniors as well as generating revenue to support BCHD’s broader range of community health programs and services.

Pursuant to CEQA Guidelines Section 15124(b) the objectives of a project are intended to “...*help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.*” As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD’s programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD’s continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use spaces (e.g., CHF, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

The project objectives presented in the EIR clearly meet the requirements of CEQA Guidelines Section 15124(b). It should also be noted that these project objectives have been appropriately used to develop a range of feasible alternatives that would substantially reduce significant impacts associated with the proposed Project while still accomplishing most of the basic project objectives (refer to Section 5.0, *Alternatives*). The EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only as the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), because it would reduce the total duration of the significant and unavoidable construction-related noise impact. This alternative would also incorporate an alternative circulation scheme that would avoid any potential conflicts associated with vehicle access along Flagler Lane. Further, this alternative addresses public concerns, at least in part, over the size and scope of the proposed Project.

Comment FL1-32

The comment restates that there are no laws or ordinances that require any retrofit or demolition and cites the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates in March 2018. As described in the response to Comment FL1-23, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

Comment FL1-33

The comment asserts that BCHD has no scientifically valid reason for the proposed open space. The comment goes on to restate the definitions provided by BCHD for the proposed Wellness Community and Healthy Living Campus. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments on issues related to the project objectives identified in the EIR. Pursuant to the CEQA Guidelines Section 15124(b) the objectives of a project are intended to “...help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.” As described in Section 2.4.2, *Project Background*, the proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD’s programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD’s continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use

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

The project objectives presented in Section 2.4.3, *Project Objectives* accurately describe the underlying purpose of the proposed Project. Project Objectives 3, 4, and 5 describe the purposes of the proposed Project to provide flexible, multi-use spaces and specialized facilities to support the BCHD innovative and constantly evolving programs necessary to serve the future needs of the community. Specifically, these project objectives describe that the proposed Project is intended to provide public open space, integrated assisted living facilities, and a modern campus with meeting spaces for public gatherings and interactive education.

The project objectives presented in the EIR clearly meet the requirements of CEQA Guidelines Section 15124(b). It should also be noted that these project objectives have been appropriately used to develop a range of feasible alternatives that would substantially reduce significant impacts associated with the proposed Project while still accomplishing most of the basic project objectives (refer to Section 5.0, *Alternatives*). The EIR identifies Alternative 4 – Phase 1 Preliminary Site Development Plan Only as the Environmentally Superior Alternative (refer to Section 5.6, *Identification of Environmentally Superior Alternative*), because it would reduce the total duration of the significant and unavoidable construction-related noise impact. This alternative would also incorporate an alternative circulation scheme that would avoid any potential conflicts associated with vehicle access along Flagler Lane. Further, this alternative addresses public concerns, at least in part, over the size and scope of the proposed Project.

Comment FLI-34

The comment contests the project objective to generate sufficient revenue through mission derived services to replace revenues that would be lost from discontinued use of the former Hospital Building and support the current level of programs and services. The comment asserts that BCHD is electively discontinuing use of the Beach Cities Health Center. The comment also contests the benefits of the Bluezones and LiveWell kids program.

As described in Master Response 6 – Financial Feasibility/Assurances, while CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because

CEQA is an informational document about environmental information, has been reaffirmed by the courts (*Sierra Club v. County of Napa* [2004] 121 Cal. App. 4th 1490, 1503).

As described in the response to Comment FL1-32, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the BCHD campus. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

However, it should be noted that the elimination of seismic hazards is not the only project objective or financial issue associated with the proposed Healthy Living Campus Master Plan. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD’s mission. Revenues from the long-term tenant leases support BCHD programs and services. However, BCHD’s ability to attract tenants has diminished in recent years, in part because the specialized nature of former South Bay Hospital Building and the two medical office buildings, which cannot be easily renovated to conform to tenant needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. The combined cost of renovation and seismic retrofit would render such a dual undertaking economically infeasible. These escalating costs also detract from BCHD’s mission to provide high quality community health and wellness services by diverting budget from such services to fund escalating maintenance costs. This issue is also discussed in Section 5.0, *Alternatives* as a part of the rationale for the development of Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space) as well as Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus.

Comment FL1-35

The comment restates the assertion that BCHD has no scientific quantitative basis to substantiate the open space needs. Refer to the response to Comment FL1-33 for a detailed response to comments pertaining to this issue. While there is no specific acreage requirement for the proposed open space, the proposed Healthy Living Campus Master Plan has sought to maximize the area of programmable open space and integrate it within the campus environment. This would result in a two-fold benefit of developing a publicly accessible amenity as well as reducing the overall development density of the campus.

Comment FL1-36

The comment contests the objective to address the growing need for assisted living. Refer to the response to Comment FL1-30 and Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD’s broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

Comment FL1-37

The comment restates a California Public Records Request for a definition of sufficient revenue to address growing community health needs. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). Nevertheless, a quantitative analysis of BCHD’s services can be found in the Community Health Report (<https://www.bchd.org/healthreport>) as well as the Priority-Based Annual Budgets (<https://www.bchd.org/operating-budgets>).

Comment FL1-38

The comment restates that there are no laws or ordinances that require any retrofit or demolition and cites the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates in March 2018. As described in the responses to Comment FL1-32 and FL1-34 BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to

the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

The comment asserts that the proposed Project would have noise and vibration impacts on students at Towers Elementary School as well as impacts to surrounding residents from construction noise and emergency service vehicles. Each of these issues is addressed in detail with Section 3.11, *Noise* and is supported by detailed quantitative noise modeling. Temporary, but prolonged construction-related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. However, as described in Impact NOI-1, Towers Elementary School would not experience significant construction-related noise impacts (refer to Table 3.11-16 and Table 3.11-17). As described under Impact NOI-3, the operations at the BCHD campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the RBMC and TMC. Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure substantially contribute to increases in noise pollution that could measurably result in health concerns.

Comment FLI-39

The comment restates California Public Records Requests for budgeting at a program level that consider public benefits and costs. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While the CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). Nevertheless, a quantitative analysis of BCHD’s services can be found in the Community Health Report (<https://www.bchd.org/healthreport>) as well as the Priority-Based Annual Budgets (<https://www.bchd.org/operating-budgets>).

Comment FL1-40

The comment restates the assertion that there is no rationale for the size of the required open space. Refer to the response to Comment FL1-33 and FL1-35 for a detailed response to comments pertaining to this issue. While there is no specific acreage requirement for the proposed open space, the proposed Healthy Living Campus Master Plan has sought to maximize the area of programmable open space and integrate it within the campus environment. This would result in a two-fold benefit of developing a publicly accessible amenity as well as reducing the overall development density of the campus.

Comment FL1-41

This comment asserts that there is little need for the proposed Assisted Living program, selectively siting from the MDS market study. Refer to the responses to Comment FL1-3 as well as Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. Refer also to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

The MDS market study identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. At the request of BCHD, Cain Brothers independently reviewed the market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. Further, the comment focuses on the proposed Assisted Living program and does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

With regard to the assertion that the proposed Project would result in Environmental Justice impacts, refer to the response to Comment FL1-18. According to OEHHA CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-

405), which fall within the 90 to 100 percentile of Environmental Justice communities. While not specially a CEQA issue, the claim that the proposed Project would have a disproportionate impact on an Environmental Justice community is unfounded.

Comment FLI-42

The comment asserts that BCHD has provided no quantitative analysis of net benefits to the Beach Cities in response to California Public Records Requests. The comment asserts that this invalidates the project objective to redevelop the site to create a modern Healthy Living campus with public open space and facilities designed to meet the future health needs of residents, including a Community Wellness Pavilion with meeting spaces for public gatherings and interactive education. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While the CEQA states that an EIR should provide a description of the project, including a “*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “*...supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

As described in CEQA Guidelines Section 15093, “*CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project.*” If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall “*...state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record*” (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

Comment FLI-43

The comment asserts that BCHD has provided no quantitative analysis of net benefits to the Beach Cities in response to California Public Records Requests. The comment asserts that this invalidates the project objective to generate sufficient revenue through mission-derived services or facilities to address growing future community health needs. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

While the CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

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Comment FL1-44

The comment restates that there are no laws or ordinances that require any retrofit or demolition and cites the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates in March 2018. As described in the response to Comment FL1-32, FL1-34, and FL1-38 BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under SB 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the BCHD campus. However, recognizing that in addition to escalating maintenance costs, the structures pose a potential future public safety hazard for building tenants, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

The comment asserts that the proposed Project would have noise and vibration impacts on students at Towers Elementary School as well as impacts to surrounding residents from construction noise and emergency service vehicles. Each of these issues is addressed in detail with Section 3.11, *Noise* and is supported by detailed quantitative noise modeling. Temporary, but prolonged construction-

related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. However, as described in Impact NOI-1, Towers Elementary School would not experience significant construction-related noise impacts (refer to Table 3.11-16 and Table 3.11-17). As described under Impact NOI-3, the operations at the BCHD campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the RBMC and TMC. Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure substantially contribute to increases in noise pollution that could measurably result in health concerns.

Comment FLI-45

The comment incorrectly claims that the EIR ignores much of the public concern regarding impacts. Contrary to this assertion, the summary provided in Section 1.8, *Areas of Known Public Controversy*, clearly complies with the intent of CEQA Guidelines Section 15123, which is referenced in the comment and states that “[a]n EIR shall contain a brief summary of the proposed actions and its consequences.” The summary provides approximately 2 pages of bulleted issues that were known to be of concern during the preparation of the EIR. Additionally, as described in Section 1.8, *Areas of Known Public Controversy*, all comments letters received on the Notice of Preparation (NOP) were also provided as Appendix A to the EIR. Each of these comment letters was reviewed and marked up to identify individual environmental issues. Each of these issues was considered and responded to during the preparation of the environmental impact analysis provided in the EIR. The assertion that BCHD ignored much of the public concern regarding impacts is unfounded.

Comment FLI-46

The comment asserts that the EIR ignores the perimeter impacts of construction, impacts associated with nighttime lighting and glare, the elevated height of the Project site and the associated visual impacts related to building height, issues regarding the total building square footage, and issues related to the size of the proposed parking structure.

First, it is important to note that each of the environmental issues raised in this comment were addressed in the EIR. Visual impacts – including potential impacts relating to building height, which also considered the topography of the Project site and the surrounding area – were addressed

in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 and Impact VIS-2. Impacts related to nighttime lighting and glare were addressed in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3. Perceptions that the total square footage described in the proposed Project are still too big, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

The comment also asserts that these environment issues would result in negative health impacts. However, the provided citations do not provide a clear connection between the environmental issue raised in the comment and the purported negative health impacts. For example, the study connecting nighttime lighting to cancer, *Missing the Dark: Health Effects of Light Pollution* is a broad review of light pollution. This literature review regularly references example locations (e.g., Manhattan or Las Vegas) that are not comparable to the area surrounding the BCHD campus. The individual studies referenced in this literature review are also not generally applicable to the proposed Project or the area surrounding the BCHD campus. For example, the literature review cites a 1995 study that “...examined female employees working a rotating night shift and found that an elevated breast cancer risk is associated with occupational exposure to artificial light at night.” The construction of limited downcast security lighting in compliance with the RBMC and TMC cannot be compared with studies addressing occupational light exposure. The review also cites a 2008 study that found “[w]omen living in neighborhoods [of Israel] where it was bright enough to read a book outside at midnight had a 73% higher risk of developing breast cancer than those residing in areas with the least outdoor artificial lighting.” Again, the construction of limited downcast security lighting in compliance with the RBMC and TMC would not result in a substantial or comparable change in nighttime lighting. The review even acknowledges that, “[t]he health effects of light pollution have not been...well defined for humans.” As such, this literature review does not meet the definition of substantial evidence provided in CEQA Guidelines 15384.

Similarly, the literature review referenced for the issue of depression, *Timing of light exposure affects mood and brain circuits* also has limited applicability to the proposed Project. For example, when discussing depression, this literature review cites jet lag, seasonal changes in day length, a 2007 study during which rats were housed in constant light, epidemiological studies related to nighttime shift work, etc. The review specifically notes, “[i]n humans, the incidence of major depression has grown in parallel with the adoption of electric lights, but this is only correlation.” Again, this literature review does not meet the definition of substantial evidence provided in CEQA Guidelines 15384.

References related to glare provide broad reviews of potential impacts associated with glare, including impediment to vision, fatigue, etc. However, the findings of these reviews do not conflict with or challenge any specific aspects of the analysis provided in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3.

The same is true for each of the other studies that have been referenced, which do not provide any clear link between the proposed Project and the purported health impacts. The reference linking shade and shadows to cognitive impairment, *Severe Urban Outdoor Air Pollution and Children's Structure and Functional Brain Development, From Evidence to Precautionary Strategic Action* does not even reference shade or shadows. The reference linking nighttime lighting to mental disorder, *Sunshine, Serotonin, and Skin: A Partial Explanation for Seasonal Patterns in Psychopathology*, specifically addresses season exposure to sunlight and also does not reference shade or shadows. Again, none of these studies or literature reviews meet the definition of substantial evidence provided in CEQA Guidelines 15384.

Comment FLI-47

The comment incorrectly claims that the EIR ignores requests to expand the area of concern to the City of Torrance, including Tomlee Avenue, Towers Street, Mildred Avenue, and Redbeam Avenue. The comment also incorrectly claims that the EIR ignores future operational air emissions and traffic emissions on surrounding residents and studies. As shown in Table 3.2-4 the EIR clearly considers sensitive receptors located to the east of the BCHD campus in the City of Torrance. The EIR conservatively assesses potential impacts to the nearest sensitive receptor located 80 feet from the edge of the BCHD campus. The EIR also clearly considers adjacent recreational land uses and schools – including Towers Elementary School located at a distance of 350 feet from the edge of the BCHD campus. Impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction-related HRA.

Comment FLI-48

This comment asserts that issues regarding displaced wildlife and vermin infestations have been ignored. Issues related to rodents are discussed in the EIR, which notes that “[d]ue to the presence of the Silverado Memory Care Community and associated dining services on the BCHD campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus.” In light of this ongoing program, assertions that the proposed Project would result in vermin infestations is unfounded and speculative.

Comment FLI-49

This comment states that issues regarding nuclear/radioactive medical waste have been ignored. This issue has been addressed in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-1. As described therein, medical wastes generated on-site would continue to be disposed of in special containers located in a secure area of the facility and would be collected regularly. All hazardous materials used on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. As described in Section 3.8.2, *Regulatory Setting*, hazardous chemical and biohazardous materials management laws in California include the following statutes:

- Hazardous Waste Control Act;
- Medical Waste Management Act;
- Hazardous Materials Release Response Plans and Inventory Act;
- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65);
- Hazardous Substances Act;
- Hazardous Waste Management Planning and Facility Siting (Tanner Act);
- Porter Cologne Water Quality Control Act;
- Title 23 of the California Code of Regulations (CCR) Division 6, Chapter 16: Underground Storage Tank Regulations;
- Title 22 of the CCR: Hazardous Waste;
- Title 8 of the CCR, Section 1529: Asbestos;
- California Public Resources Code (PRC) – Article 4.2 Hazardous Wells Section 3255; and
- SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.

Comment FLI-50

The comment incorrectly states that noise and vibration at Towers Elementary School are not considered in the EIR. Section 3.11, *Noise* clearly discusses and quantifies the potential noise impacts at Towers Elementary School. First, it is important to note that while the EIR finds

significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east, exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Further as described in Section 3.11, *Noise* under Impact NOI-2, ground-borne vibration levels generated during construction would not affect or be noticeable to any sensitive receptors during construction. As such, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the BCHD campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. Additionally, at least 1 month prior to the initiation of construction-related activities during Phase 1 and Phase 2, BCHD shall prepare and distribute notices to those located within a 0.25-mile radius. As described in the response to Comment KB-4, BCHD is committed to ongoing coordination and revisions to the construction schedule, as feasible, ahead of and during the proposed construction activities, to protect and maintain the indoor learning environment at Towers Elementary School.

At least some of the references provided in the comment address issues related to air quality, including *Air particulate matter and cardiovascular disease: the epidemiological, biomedical and clinical evidence*. For issues related to temporary, but prolonged construction-related air quality impacts as they related to Towers Elementary School refer to the response to Comment FL1-47. None of the other references conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* including the detailed quantitative noise modeling effort. For example, the Education Week article, *Low-Level Classroom Noise Distract, Experts Say*, provides a broad review of classroom noise issues, and does not provide an agreed upon quantitative noise level at which interruption of learning occurs. The decibel levels that are cited in the article – 60 dBA (i.e., normal conversational noise) and a 10-dBA increase – would not be met or exceeded as a result of construction-related activities. As described in Table 3.11-20, with the construction of the required

noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. The literature review, *Kids in Noisy Classrooms: What does the Research Really Say*, specifically acknowledges “[m]ost conclusions on the different effects of the types of noise have largely been inferred from adult studies or not investigated in a systematic manner for children. In addition, noise typical of ‘real-life schools’ have not been the focus of this type of research.” None of the referenced studies or literature reviews suggest the application of a different thresholds for temporary, but prolonged construction-related noise.

Comment FL1-51

The comment incorrectly states that the EIR miscategorized the impact as population and housing. Contrary to this assertion, impacts related to emergency response are addressed in Section 3.13, *Public Services*. Issues related to siren noise are addressed in Section 3.11, *Noise*. As described under Impact NOI-3, the development of Phase 1 of the proposed Healthy Living Campus Master Plan would incrementally increase the total number of individuals requiring ambulance services through the proposed addition of 177 new Assisted Living bed spaces to the existing 120 Memory Care bed spaces, bringing the total permanent residents supported at the site to 297. Based on an assumed average of 0.82 annual calls per bed space per year to the existing BCHD campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the BCHD campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). When sirens are necessary for an emergency response, they typically emit noise at a magnitude of approximately 100 dBA at 100 feet. A decrease of approximately 3 dBA occurs with every doubling of distance from a mobile noise source. Therefore, during a response requiring sirens, residences along North Prospect Avenue and Beryl Street experience peak short-duration exterior noise levels between 91 and 100 dBA. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic. Thus, given the infrequent and short duration of siren utilization responding to emergency situations, noise impacts from emergency vehicles would be both negligible and less than significant.

None of the other references conflict with or challenge any specific aspects of the analysis related to emergency services. For example, neither the article *How Stress Makes Us Sick and Affects Immunity, Inflammation, Digestion* nor the literature review *Chronic stress: a critical risk factor for atherosclerosis* address noise or more specifically siren noise. The literature review does provide one fleeting reference to siren noise, however, neither the literature review, nor the references provide any substantial evidence that an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in health impacts.

Comment FLI-53

The comment incorrectly claims that the EIR ignores issues related to emergency, police, and fire services. However, contrary to this assertion, issues related to each of these public services are provided in Section 3.13, *Public Services*.

Comment FLI-54

This comment incorrectly claims that the EIR ignores potential impacts to recreation, citing a lack of discussion on shade and shadows at Towers Elementary School. As described in Section 4.5, *Effects Found Not to Be Significant*, because the proposed Project would expand open space and recreational facilities, the proposed Project may substitute the demand for the City's already substantial recreational facilities (e.g., parks, beaches, open space, etc.). Because the proposed Project would not substantially increase demand on recreational facilities, potential impacts to recreational resources would be considered less than significant. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions. Additionally, impacts to Towers Elementary School related to shade and shadows are addressed in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-4. As described therein, during the Fall and Winter, the proposed RCFE Building would cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). The latest dismissal time for Towers Elementary School students is at 3:12 p.m. for 4th and 5th graders; however, and Towers Elementary School closes at 4:00 p.m. Therefore, shadows cast by the proposed RCFE Building would not have a significant adverse effect on Towers Elementary School. The comment does not challenge any specific aspects of the analysis of this analysis.

Comment FLI-55

The comment asserts that the EIR does not address issues related to school drop-off/pick-up or other general traffic impacts during construction and operations. First, it should be noted that pursuant to SB 743 and CEQA Guidelines Section 15064.3, vehicle miles travel (VMT) has replaced roadway capacity-based or automobile delay-based level of service (LOS), as the metric for transportation impact analysis (refer to Section 3.14, *Transportation*). Nevertheless, the EIR acknowledges that construction-related activities could disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and

control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation. For additional discussion and a detailed response to comments pertaining to construction-related impacts, refer to Master Response 13 – Transportation Analysis.

It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Comment FL1-56

The comment asserts that BCHD underreports and minimizes aesthetic impacts associated with the proposed Project. Each of these issues are addressed in detail in the response to Comments FL1-57 through FL1-59.

Comment FL1-57

The comment claims that the proposed Project would result in illegal taking of blue sky views and asserts that the EIR does not assess a maximum elevation on West 190th Street, does not provide sufficient key viewing locations, does not illustrate the proposed Project without landscaping, and fails to provide simulations of development under Phase 2.

The comment does not provide any citations, legal or otherwise, that support the assertion that the proposed Project would result in illegal taking of blue sky views. With regard to maximum elevation views along West 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190th Street that provide slightly elevated views – including the intersection of Prospect & West 190th Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these

intersections do not provide clear uninterrupted views of this scenic resource. With regard to the requested analysis of additional representative views, CEQA Guidelines Section 15204 clearly states: “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.*” As previously described, the six representative views offer a range of public views from public streets, sidewalks, and recreational resources within the vicinity of the Project site. The landscaping included in the proposed Project is described in Section 2.0, *Project Description* and shown in Figure 2-7. As described further in Section 3.3, *Biological Resources*, the proposed landscaping plan would replace this existing landscaped vegetation with new vegetation that meets the landscaping regulations provided in RBMC Section 10-2.1900. Additionally, the proposed tree removal and the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane. Contrary to the comment’s assertion, the landscaping shown in the photosimulations is not fake, and instead is a result of careful coordination between VIZf/x and the Landscape Architects. Lastly, the visual impact analysis relies on the best available information for the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights.

Comment FLI-58

The comment claims that the proposed Project would result in illegal taking of recreation and sunlight. The comment states that the shade and shadow analysis is insufficient and fails to provide hourly data and fails to evaluate the effects of shading on recreation and health.

Refer to Master Comment 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows. Shade and shadow simulations were prepared for the proposed Project using a computer-generated 3D model to identify the height and bulk of proposed building elements, mapping the footprint (i.e., location, shape, and size) of the Project site, and then calculating and diagramming the shadows that would be cast by the building

components during the most extreme, or conservative, conditions (see Appendix M). The analysis simulates shadows for the Summer Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 6:00 p.m., for the Autumnal (Fall) Equinox at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., 4:00 p.m., and 5:00 p.m., and for the Winter Solstice at 8:00 a.m., 10:00 a.m., 12:00 p.m., 2:00 p.m., and 4:00 p.m. By modeling shadows for the Autumnal Equinox and the Summer and Winter Solstices, it is possible to see and analyze the worst and best-case scenarios of future shadow effects. None of the shade and shadows impacts – including impacts to adjacent residences or Towers Elementary School – would exceed the thresholds established in the EIR, that a significant shade and shadow impact would occur “...if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).”

With regard to the claim that shading associated with the proposed Project would result in health impacts, refer to the detailed discussion provided in the response to Comment FL1-47. With regard to the claim that shading would result in vehicle safety impacts, no substantial evidence has been provided to demonstrate a fair argument that shading would result in a hazardous impact on the surrounding transportation network.

Comment FL1-59

The comment asserts that the existing BCHD campus employs non-directional lighting and that lighting is left on all day. The comment claims that neighbors have issued complaints regarding lighting (and other issues related to nighttime glare and noise) since 2000. The comment goes on to claim that this is evidence that BCHD cannot comply with the RBMC.

Issues related to nighttime lighting are addressed in Impact VIS-1 and Impact VIS-3. As described therein, outdoor lighting would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with RBMC Section 92.30.5 and these design guidelines. The proposed Project would be consistent with the objectives and policies in the Residential Design Guidelines for Multi-Family Residential. It should be noted that the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. During this review, the proposed lighting as well as the other reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare consistent with the requirements of the RBMC.

With regard to the claim that shading associated with the proposed Project would result in health impacts, refer to the detailed discussion provided in the response to Comment FL1-47.

Comment FL1-60

The comment asserts that the EIR minimizes the impacts of particulate matter as it relates to construction and operation of the proposed Project. Refer to the response to Comment FL1-47 as well as Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to particulate matter emissions as well as other criteria air pollutant emissions and toxic air contaminants (TACs). As described therein impacts associated with temporary, but prolonged construction-related impacts are addressed in Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD’s mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction-related HRA.

Comment FL1-61

The comment asserts that air emissions associated with the proposed Project – particularly the parking structure proposed as a part of Phase 2 development – could create premature Alzheimer’s in children. Operational air quality impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. Refer to the response to Comment FL1-12 for a detailed discussion and response to comments pertaining to this issue. As described therein, the comment fails to acknowledge the extensive quantitative modeling provided under Impact AQ-3, which demonstrates that operational criteria air pollutant emissions, including mobile source emissions associated with vehicle trips to and from the Project site, would not exceed the SCAQMD’s LST, which account for potential human health effects from criteria air pollutants.

The references provided in this comment do not support a conclusion that construction or operational emissions would result in health impacts. For example, the study *The associated of early-life exposure to ambient PM_{2.5} and later-childhood height-for-age in India: an observational*

study describes that children in the sample were exposed to an average of 55 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) of $\text{PM}_{2.5}$ in their birth month. For reference, the construction HRA demonstrates that the maximum unmitigated concentration of $\text{PM}_{2.5}$ would be $0.41021 \mu\text{g}/\text{m}^3$, whereas the maximum mitigated concentration would be $0.02373 \mu\text{g}/\text{m}^3$. These emissions, which would occur temporarily during the Phase 1 construction activities, would represent the maximum $\text{PM}_{2.5}$ emissions that could be experienced during construction or operation of the proposed Project. Similarly, the study *Severe Urban Outdoor Air Pollution and Children's Structural and Functional Brain Development, From Evidence to Precautionary Strategic Action* cite a World Health Organization (WHO) safety cut off of $<10 \mu\text{g}/\text{m}^3$. Neither construction-related nor operational emissions of $\text{PM}_{2.5}$ would approach these values. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction-related HRA.

Comment FL1-62

The comment asserts that BCHD underreports and minimizes noise impacts. Each of these issues are addressed in detail in the response to Comment FL1-63 and FL1-64.

Comment FL1-63

The comment claims that the use of the 8-hour continuous noise level (L_{eq}) metric is inappropriate for evaluating noise and vibration impacts, particularly when it comes to students with Individualized Education Program (IEPs) and 504 Plans. The comment goes on to claim that haul trucks, which typically generate traffic noise levels of 85 dBA L_{max} at 50 feet, would create a distraction to students.

First, it is important to note that the threshold of significance for noise impacts identified in the EIR is based on FTA *Transit Noise and Vibration Impact Assessment Manual*, which states that an L_{eq} of 80 dBA and a 30-day average of 75 dBA L_{dn} is a reasonable criterion for assessment of construction activities on residential land use. As described in the EIR, this unit of measurement is appropriate because L_{eq} can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,
- Average noise over all phases of the construction.

Given the duration of construction activities associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program, the noise metric L_{dn} , averaged over 30-days, was also assessed.

It should be noted that the typical ranges of L_{max} at 50 feet for typical construction equipment that would be used during construction are disclosed in Table 3.11-15. As described in Section 3.11.4, *Impact Assessment and Methodology*, construction noise levels at on- and off-site locations were estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model where inputs included distance from construction equipment to receptor, equipment types, and usage factor, which is presented as a percentage of the equipment operating at full power within a given time frame. L_{max} noise levels for each piece of heavy construction equipment were considered as inputs during the preparation of the noise analysis. However, as a matter of common practice, construction impact analyses does not make findings based on L_{max} alone. This is because construction-related noise levels fluctuate with each construction activity (e.g., demolition, grading, foundation construction, framing, interior work, etc.) as well as the specific location of heavy construction equipment and the duration of use.

Further, the comment does not suggest any specific threshold related to L_{max} . As described in Section 3.11.3, *Regulatory Setting*, construction activities are permitted in Redondo Beach between 7:00 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (RBMC Sections 4-24.503 and 9-1.12). Similarly, construction activities are permitted in Torrance between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays (TMC Section 6-46.3.1). Neither of the local noise ordinances establish quantitative noise limits or other standards for construction. For that reason, the Detailed Analysis Construction Noise Criteria presented in the FTA's *Transit Noise and Vibration Impact Assessment Manual* have been used as a reasonable criteria for assessment and if exceeded, could result in adverse community reaction. Pursuant to CEQA Guidelines Section 15064.7(b) lead agencies have discretion to formulate their own significance thresholds and may use thresholds on a case-by-case basis. CEQA Guidelines Section 15064.7(c) states that “[w]hen using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency...is supported by substantial evidence.” The use of the FTA Detailed Analysis Construction Noise Criteria clearly meets these requirements.

With regard to the assertion that haul truck trips would cause a distraction to students, it should be noted that due to the logarithmic nature of noise, the addition of haul truck trips generating traffic noise levels of 85 dBA L_{max} at 50 feet, would increase existing daytime traffic noise by less than

1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School.

Comment FL1-64

The comment asserts that exposure to noise constitutes a health risk and provides a reference to a literature review entitled *Noise Exposure and Public Health*. The comment provides an excerpt of the abstract from the literature review, but fails to describe any connection between the literature review and the proposed Project or the potential environmental impacts resulting from the implementation of the proposed Project. Upon further investigation, the literature review generally discusses the health effects of occupational and environmental noise exposure. The review specifically states the emphasis “...is on chronic environmental noise exposures, particularly those due to traffic and industrial noises.” The review cites noise from traffic, railroad, aircraft activity, industrial noise. The review provides no mention of construction-related noise and only one fleeting mention of a study of impulsive noise in which was L_{eq} averaged over a period of 24 hours. There is no clear connection between the literature review and the potential impacts of construction on the issues raised in the comment, including hearing impairment, hypertension and ischemic heart disease, annoyance, sleep disturbance, and decreased school performance. With respect to annoyance in particular, the literature review states that “...the degree of annoyance experienced by an individual as well as that on a population level in practice can differ considerably from the exposure-response relationships...because of the influence of so-called non-acoustical factors.”

Comment FL1-65

The comment claims that the EIR under reports and minimizes impacts on recreation and cites perceived illegal taking of recreation from Towers Elementary School, illegal taking of sunlight from adjacent land uses, and failure to provide hourly shade and shadow studies. Refer to the response Comment FL1-58 and Master Comment 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows.

With regard to the claim that shading associated with the proposed Project would result in health impacts, refer to the detailed discussion provided in the response to Comment FL1-47. With regard to the claim that shading would result in vehicle safety impacts, no substantial evidence has been provided to demonstrate a fair argument that shading would result in a hazardous impact on the surrounding transportation network.

Comment FL1-66

The comment claims that the EIR under reports and minimizes impacts related to traffic and transportation. However, the comment goes on to restate issues related to noise, which were responded to in the response to Comment FL1-63.

Comment FL1-67

The comment incorrectly asserts that there was no comprehensive analysis of daily commutes associated with the RCFE and PACE facility. The comment goes on to state that there has been no comprehensive analysis of daily commutes associated with the proposed development under Phase 2. As described further in Master Response 13 – Transportation Analysis, despite the assertions of the comment, the EIR clearly does include comprehensive analysis of impacts to transportation that could occur as a result of the proposed Project. In fact, the EIR includes an exhaustive trip generation analysis that specifically identifies trip generation rates for the Assisted Living program and PACE components of the proposed Project, including residents, patients, visitors, and staff. It should be noted that the trip generation analysis determined that trip generation would be negative following the implementation of Phase 1, but would increase slightly by 376 new daily trips as compared with existing conditions during Phase 2.

As thoroughly described in Section 3.14.3, *Impact Assessment and Methodology*, Fehr & Peers began with the standard Institute of Transportation Engineers (ITE) trip generation rates, which represents the industry standard for estimating trip generation and is based on a compilation of empirical (i.e., observed) trip generation surveys at locations throughout the country. While ITE Trip Generation is a defensible approach, ITE always recommends utilizing local data where it is available. Therefore, Fehr & Peers calibrated these rates by incorporating driveway counts, pedestrian surveys, CHF membership scans, BCHD programming information, and market feasibility studies.

Fehr & Peers also obtained average trip length data for the BCHD campus using StreetLight location-based service data from 2019, prior to the onset of the COVID-19 pandemic. Using the StreetLight portal, Fehr & Peers mapped the relative weight of the origin/destination grid cells to and from the BCHD campus, which revealed that the average weekday trip length to and from the BCHD campus is 6.4 miles, and the average weekend trip length is 6.3 miles. Given that the proposed Project would redevelop the existing campus with uses that would continue to serve the Beach Cities and surrounding South Bay communities, existing trip lengths are likely to remain similar under the proposed Project. StreetLight data were also evaluated for Brookdale South Bay located at 5481 West Torrance Boulevard in Torrance. Fehr & Peers calculated an average trip length of 4.8 miles using the StreetLight data for Brookdale South Bay. These data supported the findings of less than significant impacts to VMT.

The comment does not challenge any specific aspects of this trip generation analysis or provide any substantiating evidence to further support its assertions.

Comment FLI-68

The comment cites an article *Lockdown lessons Blue Zones founder Dan Buettner on how to make use of staying at home* and states that BCHD should act consistently with the Blue Zones program. The article discusses jobs, diet, and social connectedness; however, the comment does not make a clear connection between the article, the proposed Project, or the environmental impact analysis provided in the EIR.

Comment FLI-69

The comment provides citations to various studies and literature reviews related to noise, chronic stress, and negative health impacts. However, beyond discussing the issue of noise, neither the comment, nor any of the referenced studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk* discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. Similarly, *Noise Annoyances Associated with Depression and Anxiety in the General Population – The Contribution of Aircraft Noise* addresses a small cohort of 15 participants, age 35 to 74 year, in western Mid-Germany, and assesses their annoyances for road traffic, aircraft, railways, industrial, neighborhood indoor and outdoor noise. The study found that aircraft noise was by far most prominent affecting the population. These studies provide no detailed analysis of construction-related noise or other impulsive noise sources (e.g., heavy construction equipment). With respect to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. None of the referenced studies or literature reviews conflict with this analysis or suggest the application of a different thresholds roadway noise.

Comment FLI-70

The comment provides citations to various studies and literature reviews related to traffic noise, traffic related air pollution and stress. However, beyond discussing the issues of traffic, noise, and air quality neither the comment, nor any of these studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Chronic traffic noise stress accelerated brain impairment and cognitive decline in mice*, discusses roadway noise and its relationship to light/dark cycles. Similarly, *Traffic Noise and Mental Health: A*

Systematic Review and Meta-Analysis includes a systematic literature search and summary of evidence for road, railway, or aircraft noise-related risks of depression, anxiety, cognitive decline, and dementia among adults. This study in particular found that aircraft noise exposure increases the risk for depression, but otherwise did not detect statistically significant risk increases due to roadway and railway traffic noise or for anxiety. *Traffic-Related Air Pollution and Stress: Effects on Asthma* provides very specific clarifications on another study *Chronic Traffic-Related Air Pollution and Stress Interact to Predict Biologic and Clinical Outcomes in Asthma*. This latter study determined that physical and social environments interacted, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress. Importantly, this study did not measure any increases in stress in children as a result of traffic. Additionally, the study acknowledges limitations including small sample size, varying time frame for measures, and pollution estimates using land using models that are best suited for long-term exposure.

As described in the response to Comment FL1-67 as well as Master Response 14 – Transportation Analysis, the EIR provided a detailed trip generation analysis and an exhaustive quantitative modeling effort. Implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). This is in part because Phase 1 of the proposed Project would replace high trip generating land uses (e.g., medical office) with lower trip generating land uses (e.g., Assisted Living units). This reduction in daily vehicle trips as a result of Phase 1 is also attributed to the demolition of most of the existing uses within the Beach Cities Health Center and the construction of only a small portion of the proposed Healthy Living Campus Master Plan. After completion of Phase 2, however, the proposed Project is expected to generate a total of 3,360 daily vehicle trips, including 271 AM peak period trips and 195 PM peak period trips (refer to Table 3.14-7). After accounting for existing trips being removed from the roadway network, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate a net increase of 376 new daily trips as compared with existing conditions.

None of the referenced studies suggest that this level of operational traffic would result in traffic-related stress, noise, or air quality impacts. With regard to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. With regard to transportation-related air quality impacts, the quantitative analysis demonstrates that criteria air pollutant emissions and TACs would be less than SCAQMD’s thresholds.

Comment FL1-71

The comment provides citations to two studies related to sirens, chronic stress, and post-traumatic stress disorder. related to traffic noise, traffic related air pollution and stress. *The acute physiological stress response to an emergency alarm and mobilization during the day and at night* addressed occupational hazards for firefighters related to emergency alarm and mobilization during daytime and the nighttime hours. *Impact of Stressful Events on Motivations, Self-Efficacy, and Development Post-Traumatic Symptoms among Youth Volunteers in Emergency Medical Services*, addresses Israeli Emergency Medical Service (EMS) personal that have been exposed to potentially traumatic events, including mass terror attacks. This study aims to identify how those events affect young volunteers in an effort to help find ways to empower the volunteers and increase their resilience. Neither of these studies are directly applicable to residents that are exposed to siren noise. Based on an assumed average of 0.82 annual calls per bed space per year to the existing BCHD campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the BCHD campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). This study does not provide any substantial evidence that an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in health impacts.

Comment FL1-72

The comment provides citations to two literature review related to the physiological impacts of stress. *Neurobiological and Systemic Effects of Chronic Stress* identifies the many body systems affected by stress, discusses key physiological mechanisms, and generally discusses social and physical environmental influences and interventions related to stress. Similarly, *The impact of stress on body function: A review* also provides an overview of the major effects of stress on the primary physiological systems of humans. Neither the comment nor these literature reviews provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. For example, neither of these literature reviews mention construction, noise, traffic, etc. or other issues that have been raised in the other comments addressed above.

Letter FL2

Comment FL2-1

The comment claims that the Beach Cities Health District (BCHD) has asserted an obligation to protect the health of the community beyond any published standards, laws, or ordinance. Although these comments do not address the adequacy of the Environmental Impact Report (EIR), as

discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment FL2-2

The comment asserts that the proposed Project would result in impacts to aesthetics and associated negative health impacts. However, consistent with CEQA Guidelines 15204(b), “...if persons...believe that the project may have a significant effect, they should:

- (1) Identify the specific effect,
- (2) Explain why they believe the effect would occur, and
- (3) Explain why they believe the effect would be significant”

As described in CEQA Guidelines Section 15204(c), “[r]eviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

The comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

Comment FL2-3

The comment asserts that the implementation of the proposed Project would in impacts to air quality and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR. In particular, the comment does not challenge the exhaustive quantitative air emissions modeling, including the construction Health Risk Assessment (HRA) prepared by iLanco.

Comment FL2-4

The comment asserts that the implementation of the proposed Project would result in purported impacts to land use and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

Comment FL2-5

The comment asserts that the implementation of the proposed Project would result in impacts to noise and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR. In particular the comment does not challenge the exhaustive noise modeling prepared in support of the EIR's noise analysis.

Comment FL2-6

The comment asserts that the implementation of the proposed Project would result in negative impacts to recreation and associated negative health impacts. However, as described in the response to Comment FL2-2, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

Comment FL2-7

The comment asserts that the implementation of the proposed Project would result in purported impacts to traffic and associated negative health impacts. However, the comment provides no substantiating evidence or expert opinion. Additionally, the comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR. In particular, the comment does not challenge the Vehicle Miles Traveled study or the the Non-CEQA Intersection Operational Evaluation prepared by Fehr & Peers.

Comment FL2-8

The comment provides a variety of links to studies, literature reviews, and other articles related to chronic stress. These articles are also identified in Comment MN106-19. However, as described in the individual response to Comment MN106-19, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, the article *Lockdown lessons Blue Zones founder Dan Buettner on how to make use of staying at home*, which is also identified in Comment FL-1, states that BCHD should act consistently with the Blue Zones program. The article discusses jobs, diet, and social connectedness; however, the comment does not make a clear connection between the article and the purported impacts associated with the proposed Project.

Comment FL2-9

The comment provides a variety of links to studies, literature reviews, and other articles related to increased cardiovascular risk from noise. These articles are also identified in Comment MN106-18. However, as described in the individual response to Comment MN106-18, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk*, which is also identified in Comment FL1-69, discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. This study provides no detailed analysis or discussion of construction-related noise or other impulsive noise sources (e.g., heavy construction equipment). None of the referenced studies or literature reviews conflict with this analysis or suggest the application of a different thresholds for roadway noise.

Comment FL2-10

The comment provides a variety of links to studies, literature reviews, and other articles discussing traffic-induced chronic stress associated with air emissions and noise. These articles are also identified in Letter MN106-18. However, as described in the individual responses to this letter this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Chronic traffic noise stress accelerated brain impairment and cognitive decline in mice*, which is also discussed in Comment FL1-70, discusses roadway noise and its relationship to light/dark cycles. Additionally, *Traffic Noise and Mental Health: A Systematic Review and Meta-Analysis*, which is also discussed in Comment FL1-70, includes a systematic literature search and summary of evidence for road, railway, or aircraft noise-related risks of depression, anxiety, cognitive decline, and dementia among adults. This study in particular found that aircraft noise exposure increases the risk for depression, but otherwise did not detect statistically significant risk increases due to roadway and railway traffic noise or for anxiety. *Traffic-Related Air Pollution and Stress: Effects on Asthma* provides very specific clarifications on another study *Chronic Traffic-Related Air Pollution and Stress Interact to Predict Biologic and Clinical Outcomes in Asthma*. This latter study determined that physical and social environments interacted, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress. Importantly, this study did not measure any increases in stress in children as a result of traffic. Additionally, the study acknowledges limitations including small sample size, varying time frame for measures, and pollution estimates using land using models that are best suited for long-term exposure.

Comment FL2-11

The comment provides a links to a study that explores the associations between outdoor nighttime lights and sleep patterns in the human population. However, this study, *Artificial Outdoor Nighttime Lights Associate with Altered Sleep Behavior in the American General Population*, does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. This study involved a telephone survey with questions on life and sleeping habitats, the results of which were then compared to outdoor nighttime light satellite measurements. The conclusions of the study specifically note that the results are purely observational: “*We found several significant associations with outdoor nighttime lights and sleep behaviors but because of the nature of this study, actual level of lights could not be assessed. We did not ask for the presence of curtains in the bedroom windows and the opacity of the curtains nor for the use of a sleeping mask. As our results show, there are also other environmental factors than outdoor lights that were associated with alterations in sleep behaviors; for example, the presence of young children or occupation status.*” The comment does not make any clear connections between the article and the proposed downcast lighting, which would be designed to be consistent with the requirements of the Redondo Beach Municipal Code (RBMC) as well as the Torrance Municipal Code (TMC) for light fixtures within the City of Torrance right-of-way.

Comment FL2-12

The comment provides a variety of links to studies, literature reviews, and other articles relate\d to increased cardiovascular risk from noise. These articles are also identified in Comment MN106-5. However, as described in the individual responses to this letter this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, the study *Road Traffic Safety: An analysis of the cross-effects of economic road and population factors* describes data collected on traffic accidents in 31 provinces and cities in China from 2004 to 2016 and concludes the increase of gross domestic product and traffic investment can significantly reduce the number of road traffic casualties in China. The studies regarding pedestrian safety largely provide quantitative analysis of demographics of pedestrian injury and mortality rates. None of the referenced studies or articles conflict with the EIR’s analysis or suggest an element of the proposed Project would result in a significant environmental impact.

Comment FL2-13

The comment provides a variety of links to studies, literature reviews, and other articles related to traffic-induced health hazards. These articles are also identified in Comment MN106-6. As described in the response to Comment MN 106-6, this comment does not provide a clear

relationship to the proposed Project or the environmental impact analysis provided in the EIR. Master Response 10 – Air Quality Analysis describes the exhaustive air quality modeling effort that was conducted to evaluate construction and operational air emissions associated with the proposed Project. Construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts, including mobile source emissions associated with vehicle trips to and from the Project site, are addressed under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of Mitigation Measure (MM) AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District’s (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD mass daily significance thresholds for operation, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

Comment FL2-14

The comment provides a variety of links to studies, literature reviews, and other articles related to emergency vehicle noise. These articles are also identified in Comment MN106-7. As described in the response to Comment MN 106-7, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The acute physiological stress response to an emergency alarm and mobilization during the day and at night*, which is also referenced in Comment FL-71, addressed occupational hazards for firefighters related to emergency alarm and mobilization during daytime and the nighttime hours. This study is not directly applicable to residents that are exposed to siren noise. Based on an assumed average of 0.82 annual calls per bed space per year to the existing BCHD campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under Phase 1 it is anticipated that the BCHD campus would generate an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month). This study does not provide any substantial evidence that an estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in health impacts.

Comment FL2-15

The comment provides a variety of links to studies, literature reviews, and other articles related to potential health impacts associated with window glare. These articles are also identified in Comment MN106-8. As described in the response to Comment MN 106-8, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided

in the EIR. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding glare.

Comment FL2-16

The comment provides a variety of links related to shade and shadow impacts. These articles are also identified in Letter MN106-9. However, as described in the individual responses to this letter these comments do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Place value: place quality and its impact on health, social, economic and environmental outcomes*, describes a general link between place quality and link to health, social, economic, and environment effects. The EIR includes detailed consideration and analysis of Project impacts to shade and shadow effects in Section 3.1, Aesthetics and Visual Resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further detail on impacts to these issues. Neither the comment nor the citations provide any clear detail that would suggest the EIR analysis is insufficient.

Comment FL2-16

The comment provides a variety of links related to shade and shadow impacts. These articles are also identified in Letter MN106-9. However, as described in the individual responses to this letter these comments do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Place value: place quality and its impact on health, social, economic and environmental outcomes*, describes a general link between place quality and link to health, social, economic, and environment effects. The EIR includes detailed consideration and analysis of Project impacts to shade and shadow effects in Section 3.1, Aesthetics and Visual Resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further detail on impacts to these issues. Neither the comment nor the citations provide any clear detail that would suggest the EIR analysis is insufficient.

Comment FL2-17

The comment provides a variety of links related to nighttime lighting impacts. These articles are also identified in Comment MN106-10. The cited studies address a range of topics including nighttime or artificial lighting’s relationship to bats, circadian rhythm, teen sleep and mood, light pollution, and attraction of disease-carrying pests. Neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of Project impacts with nighttime lighting and glare issues in Section 3.1, Aesthetics and Visual Resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments

regarding nighttime lighting. The comment provides no detail or explanation as to how or why the provided studies are directly applicable to the proposed Project.

Comment FL2-18

The comment provides a variety of links related to operational noise in urban environments. These articles are also identified in Comment MN106-11. However, none of the referenced studies or literature reviews conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* including the detailed quantitative noise modeling effort. For example, *Noise Levels Associated with Urban Land Use* describes that the aim of the study was to assess and compare noise levels in two urban neighborhoods: one completely residential and comprised of mostly single and multi-family dwellings, and the other characteristic of mixed residential and commercial land uses. The study focused on roadway noise, which was the primary source of ambient noise in both study areas. The discussion even acknowledges that certain limitations may affect the generalizability of the results. For example, noise levels were measured in only two neighborhoods and within a limited time period. Increasing the number of study areas to include additional land-use types would provide a deeper understanding of the relationship between environmental noise, the built environment, and human health risks. The quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant.

Comment FL2-19

The comment provides a variety of links related to increased crime rates and homelessness. These articles are also identified in Comment MN106-12. As described in the response to Comment MN 106-12, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, one of the articles simply provides a summary of crime rates among homeless populations of Los Angeles, one of which was specific to the year 2018. Another provides a guide on homeless encampments provided by Arizona State University. There is no clear connection between the materials cited and the proposed Project. None of the material provides any mention of Redondo Beach, Torrance, construction activities, redevelopment, operation of healthy living campuses or similar facilities.

Comment FL2-20

The comment provides citations to various studies and referential material related to fugitive dust, particulate matter, and adverse respiratory health effects. However, as described in the response to Comment FL2-13, the findings of these reviews do not conflict with or challenge any specific

aspects of the analysis provided in Section 3.2, *Air Quality*. Impacts associated with temporary, but prolonged construction-related impacts are fully addressed under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction HRA.

Comment FL2-21

The comment provides citations to various studies and articles related to noise, sleep disturbance, traffic noise and health. *Environmental noise and sleep disturbances: a threat to health, A Multilevel Analysis of Perceived Noise Pollution, Auditory and non-auditory effects of noise on health, Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality* is identified in Comment FL2-18 and *Environmental Stressors: The Mental Health Impacts of Living Near Industrial Activity* is identified in Comment FL2-21. Refer to these individual responses for further discussion. As described therein, none of the referenced studies or literature reviews conflict with or challenge any specific aspects of the analysis provided in the EIR, including the detailed quantitative air quality and noise modeling efforts.

Comment FL2-22

The comment provides a variety of links related to asbestos-containing material (ACM) and the potential for asbestos poisoning. These articles are also identified in Comment MN106-15. As described in the response to Comment MN 106-15, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Asbestos Exposure among Construction Workers During Demolition of Old Houses in Tehran, Iran* evaluates asbestos exposure specifically among construction workers in Tehran, Iran. The article *Can Buildings Be Demolished Safely Without Asbestos Abatement* explores the possibility that structures in Detroit, Michigan may be able to be safely demolished without the additional cost of asbestos abatement. The comment also cites the U.S. Environmental Protection Agency's (USEPA's) *Scope of Risk Evaluation for Asbestos and Guidelines for Enhanced Management of Asbestos in Water at Ordered Demolition* but makes no indication that the proposed activities or the required mitigation measures are insufficient with referenced standards.

Estimating the Additional Greenhouse Gas Emissions in Korea: Focused on Demolition of Asbestos Containing Materials in Building describes greenhouse gas (GHG) emissions during removal of asbestos containing material due to operation of construction equipment and truck trips.

As described in Section 3.8, *Hazards and Hazardous Materials*, prior to demolition of existing structures with the potential to contain hazardous materials (i.e., ACM, lead-based paint [LBP], and polychlorinated biphenyl [PCB]), surveys would be conducted by a licensed contractor(s). If hazardous material is found, all applicable Federal, State, and local codes and regulations and best management practices related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds would be followed to ensure public safety, such as sealing off an area and filtering effected air. Adherence to these regulations and best management practices would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue.

Comment FL2-24

The comment provides a variety of links related to water runoff during construction. These articles are also identified in Comment MN106-16. As described in the response to Comment MN 106-16, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *Storm water contamination and its effect on the quality of urban surface waters* describes stormwater drainage and surface water pollutants within the sewage system of a city in Poland. The aim of the analyses was to explain to what extent pollutants found in storm water runoff from the studied catchments affected the quality of surface waters and whether it threatened the aquatic organisms.

The comment also fails to acknowledge that the EIR includes a detailed analysis of stormwater runoff in Section 3.9, *Hydrology and Water Quality* and potential hazards and hazardous materials in Section 3.8, *Hazards and Hazardous Materials*. As described therein and summarized in Master Response 11 - Hazards and Hazardous Materials Analysis, the Phase I Environmental Site Assessment (ESA) identified potential sources of contamination. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of these ESAs, the EIR describes compliance with applicable regulations and standards, best management practices, and required mitigation measures to address these conditions and ensure Project impacts would be less than significant. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue.

Comment FL2-25

The comment provides two citations related to with negative health impacts associated with reduced privacy. These citations are also identified in Comment MN106-17. As described in the response to Comment MN 106-17, this comment does not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, the comment provides citations for two articles with no clear connection to the proposed Project or the EIR analysis. *Designing for invisible injuries: An exploration of healing environments for posttraumatic stress* describes architecture and design strategies for creating empathetic spaces for veterans with post-traumatic stress disorder. *Trauma Informed Community Building* describes a Trauma Informed Community Building approach in community development.

Comment FL2-26

The comment provides citations to various studies related to health effects of traffic noise, nighttime noise, and general noise exposure, including cardiovascular responses in young adults. These citations are also identified in Comment MN106-18. However, beyond discussing the issue of noise, the referenced studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk* discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. The comment fails to acknowledge that noise impacts are addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. The comment does not challenge any specific thresholds, methodologies, or impacts identified in the EIR.

Comment FL2-27

The comment provides citations to various studies and literature reviews related to stress management/avoidance strategies, traffic noise, traffic-related air pollution and stress. However, beyond discussing the issues of traffic, noise, and air quality neither the comment, nor any of these studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. See the response to Comment MN106-19 for a detailed discussion and response to comments pertaining to these studies.

8.3.6 Interested Members of the Public

Letter AK1

March 23, 2021
Abbes G Khani

Comment AK1-1

The comment expresses limited support for adoption of Alternative 4 and opposition to the proposed Project, which includes a proposed service entry/exit off of Flagler Lane, as well as Alternative 6, which includes a reduced footprint for the Residential Care for the Elderly Building (RCFE) Building, but a larger building footprint wrapping around the eastern boundary of the campus. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter AK2

March 25, 2021
Abbes G Khani

Comment AK2-1

The comment correctly states that Alternative 4, described in Section 5.5.4, *Alternative 4 – Phase 1 Preliminary Site Development Plan Only*, has been identified as the environmentally superior alternative in the Environmental Impact Report (EIR). However, the comment questions why it is included and addressed an alternative rather than being addressed as the proposed Project.

As described in Section 2.0, *Project Description*, the proposed Project – including the proposed vehicle access along Flagler Lane – accommodates the preferred design, orientation of uses, and on-site circulation for the Residential Care for the Elderly Building (RCFE) Building. Therefore, this preliminary site development plan for Phase 1 has been identified as an element of the proposed Project. However, as described in Section 5, *Alternatives* during the development of the proposed Project, the City of Torrance and many residences within the Torrance neighborhood to the east of the Project site raised concerns regarding the proposed vehicle access along Flagler Lane. For example, as described in Section 3.10, *Land Use and Planning*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with Torrance Municipal Code (TMC)

Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. The City of Torrance is also considering the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. Therefore, Alternative 3 – Revised Access and Circulation, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, Alternative 5 – Relocate CHF Permanently and Reduce Parking Structure, and Alternative 6 – Reduced Height Alternative each consider an alternative access and circulation scheme, which eliminates the vehicle access on Flagler Lane. As the decision makers, the BCHD Board of Directors has full discretion to adopt any of these alternatives following deliberations on the proposed Healthy Living Campus Master Plan. Their status as alternatives to the proposed Project do not limit their adoption in any way.

Letter AK3

June 3, 2021
Abbes G Khani

Comment AK3-1

This comment expresses general opposition to the proposed Project, claiming that the decision makers involved in the development or adoption of the proposed Health Living Campus Master Plan have no statutory authority to negatively impact lives. For issues related to general opposition to the proposed Project, refer to Master Comment Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment AK3-2

This comment states that the EIR deliberately fails to address the impact on the neighborhood’s real estate valuation and that approval of the Project must address remedial/monitory compensation for adversely impacted neighborhoods. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis “...identify and focus on the significant environmental effects of a proposed project” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “significant effect on the environment” as “a substantial, or

potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.” Accordingly, the EIR analyzes the potentially significant adverse physical effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

Letter AA

June 7, 2021
Alan Archer

Comment AA-1

This comment provides a summary of the details regarding the Project site location and surrounding development from Section 2.0, *Project Description*. This comment has been received and incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

Comment AA-2

The comment restates the project objectives as presented in Section 2.4, *Project Objectives*. This comment has been received and incorporated into the Final EIR as a part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

Comment AA-3

The comment restates the analysis of aesthetics and visual resources from Section 3.1, *Aesthetics and Visual Resources* and asserts that the statement in this discussion – that views from Sunnyglen park are completely blocked by intervening 1- to 2-story structures – is false. Refer to the response to Comment TRAO-22.

Comment AA-4

The comment provides a summary of the discussion of visual character and visual quality, along with the regional setting and existing visual conditions, that is presented in Section 3.1, *Aesthetics and Visual Resources* of the EIR. This comment has been received and incorporated into the Final EIR as a part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

Comment AA-5

The comment disagrees with the findings of visual and aesthetic impacts analysis as presented in Section 3.1, *Aesthetics and Visual Resources* and states that the impacts to scenic views presented under Impact VIS-1 distract from neighborhood compatibility issues. While the comment provides renderings of the proposed Project that were presented in the EIR, the comment does not challenge any specific aspects of the analysis of scenic vistas presented in Impact VIS-1 or visual character presented in Impact VIS-2. This comment also does not provide any substantiating evidence to support its assertion that the proposed RCFE Building does not belong on the Project site. For a detailed discussion and response to comments for issues pertaining to building height and neighborhood compatibility refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

Letter AII

March 24, 2021
Alan Israel

Comment AII-1

The comment expresses general opposition to the proposed Project due to its perceived large size and perceived incompatibility with development in surrounding neighborhoods. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Aesthetics and Visual Resources* or provide any substantiating evidence to support its assertions. For issues

related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For a detailed discussion and response to comments on issues pertaining to building height and neighborhood compatibility refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

Comment AII-2

The comment expresses general opposition to the proposed Project due to the proposed length of construction activities, and effects construction would have on traffic and air quality. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Air Quality* or Section 3.14, *Transportation*. The comment also does not provide any substantiating evidence to support its assertions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to construction-related air quality impacts. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to construction-related traffic impacts.

Comment AII-3

The comment expresses general opposition to the proposed Project due to incompatibility of the size and scale of Project with surrounding residential uses, and claims that development under the proposed Project would block views and sunlight, and would change the personality of the area. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.1, *Aesthetics and Visual Resources* or Section 3.11, *Land Use and Planning*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments on issues pertaining to visual character as well as the detailed shade and shadow modeling provided in the Environmental Impact Report (EIR).

Comment AII-4

The comment expresses general opposition to the proposed Project due to proposed cost of implementation. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to concerns regarding financial feasibility of the proposed Project.

Comment AII-5

The comment expresses general opposition to the proposed Project due to the variety of assisted living facilities that already exist within the area, trends for providing assistance to the elderly within their own homes, and a lack of need for the Project. Refer to Master Response 3 – Project

Need and Benefit for a detailed discussion and response to comments pertaining to the need for the proposed Project.

Comment A11-6

The comment expresses general opposition to the proposed Project due to the anticipated cost of the proposed Assisted Living units and Memory Care units. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

Comment A11-7

The comment expresses general opposition to the proposed Project due to an alleged underlying intent of the proposed Project to generate revenue rather than provided service to the community. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the need for the proposed Project.

Letter AI2

June 9, 2021
Alan Israel

Comment AI2-1

The comment expresses general opposition to the proposed Project and asserts that it is not needed; it is too expensive; and it is too large. However, the comment does not challenge any specific aspects of the impact analysis and does not provide any substantiating evidence to support its assertions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For a detailed discussion and response to comments pertaining to the need for the proposed Project, refer to Master Response 3 – Project Need and Benefit. For a detailed discussion and response to comments pertaining to the financial feasibility of the proposed Project refer to Master Response 6 – Financial Feasibility/Assurance. For a detailed discussion and response to comments pertaining to building height and visual character, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

Comment AI2-2

The comment asserts that the proposed Project is an illegal use of public land and taxpayer funds. The use of public funding for capital improvement projects is commonplace and is clearly not illegal, particularly in this instance where revenue generated by a capital improvement project is

used to provide community health and wellness programming and services in alignment with the mission of the Beach Cities Health District (BCHD). This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment AI2-3

The comment expresses general opposition to the proposed Project due to perceived lack of benefit provided by the proposed Project. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the proposed benefits of the Project.

Comment AI2-6

The comment expresses general opposition to the proposed Project and asserts that it will destroy the residential nature of the surrounding neighborhood. However, the comment does not challenge any specific aspects of the impact analysis provided in the EIR and does not provide any substantiating evidence to support its assertions. For a detailed discussion and response to comments pertaining to building height and visual character, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

Letter AR

May 25, 2021
Allen Rubin

Comment AR-1

The comment expresses general concern regarding the City of Torrance’s closure of the southbound travel movement along Flagler, which would cause some nearby residents to go around the medical facility to Del Amo Boulevard in order to get home from Vons. This issue is separate and distinct from the proposed Project, but has generally been addressed under cumulative impacts and has been considered during the development of Alternative 3 – Revised Access and Circulation.

The comment also asserts that Redbeam has become a source of cut-through traffic for those going to the City of Redondo Beach and suggests that traffic safety issues will be exacerbated as a result of the proposed Project. The Environmental Impact Report (EIR) identifies and thoroughly discusses potential issues related to cut-through traffic. This issue was evaluated as a part of the robust transportation study prepared for the proposed Project. The comment does not challenge

any specific aspects of this analysis and does not provide any substantiating evidence to support its assertions that the vehicle access along Flagler Lane would substantially exacerbate cut-through traffic or present safety hazards. It is important to note that there would be no access to parking along Flagler Lane and that the proposed vehicle access would be limited to: 1) vehicles turning left onto Flagler Lane after dropping off passengers at the proposed Residential Care for the Elderly (RCFE) Building; and 2) service trucks entering and exiting the service area and loading dock. These types of vehicle access would not substantially contribute to cut-through traffic. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to operational traffic issues.

Finally, the comment claims that the proposed Project would have a substantial impact on property values within the vicinity. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis “*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “*significant effect on the environment*” as “*a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.*” Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

Letter AY

June 9, 2021
Amy Yick

Comment AY-1

This comment expresses opposition to the proposed Project and asserts that construction-related activities would result in poorer air quality, adversely affecting the health and wellbeing of residents and children attending schools located in the vicinity of the Project site. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and responses to comments pertaining to construction-related air quality impacts, including potential impacts to nearby sensitive receptors.

It should be noted that the analysis of criteria air pollutant emissions in the Environmental Impact Report (EIR) is supported by detailed modeling results that rely on the South Coast Air Quality

Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod) Additionally, the analysis of Toxic Air Contaminants (TACs) is supported by detailed modeling results that rely on the U.S. Environmental Protection Agency's (USEPA's) AERMOD and the California Air Resources Board's (CARB's) Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool. The comment does not challenge the methodology, assumptions, or results of these extensive modeling efforts, which informed the air quality impact analysis in the EIR and show that with the implementation of all required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts to sensitive receptors would be less than significant when compared to the SCAQMD thresholds for criteria pollutant emissions and the CARB thresholds for TACs.

Comment AY-2

The comment expresses concern regarding the construction-related noise impacts on school children and residents located in the vicinity of the Project site. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to construction-related noise impacts on nearby sensitive receptors. It should be noted that the EIR discloses and discusses a significant and unavoidable impact on sensitive receptors, including those residences located adjacent to the Beach Cities Health District (BCHD) campus along Flagler Lane and Flagler Alley. However, construction-related noise at Towers Elementary School would be less than the Federal Transit Administration (FTA) thresholds identified in the EIR. Therefore, the construction-impact of noise on the indoor learning environment would be less than significant. The comment does not challenge any specific aspects of the quantitative impact analysis in Section 3.11, *Noise* or provide any substantiating evidence to support its assertions. (As described in the response to Comment KB-4, it should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the BCHD campus by a recreational field and is located approximately 735 feet from the proposed construction activities.)

Letter ABC1

June 8, 2021
Anita & Bob Caplan
Users of the BCHD Services
402 S Lucia Avenue
Redondo Beach, CA 90277

Comment ABC1-1

The comment states that the commenter finds the EIR to be technically sufficient with regard to impact analysis and mitigation analysis. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter ABC2-1

June 8, 2021
Anita & Bob Caplan
Users of the BCHD Services
402 S Lucia Avenue
Redondo Beach, CA 90277

Comment ABC2-1

The comment states that commenter believes the proposed Project to be an excellent fit for their needs for health promotion and maintenance. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter AMG

June 8, 2021
Ann & Marty Gallagher
19404 Linda Drive
Torrance, CA 900503

Comment AMG-1

The comment expresses general opposition to the proposed Project citing the perceived size of proposed development as well as assertions that there would impacts related to shade/shadows, hazard, noise, and traffic. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.1, *Aesthetics and Visual Resources*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise*, or Section 3.14, *Transportation*. Additionally, the comment does not provide any substantiating evidence to support its assertions related to any of these issues.

The comment incorrectly states that the proposed Project would result in a loss of open space. In fact, as clearly described in Section 2.0, *Project Description* and shown in Table 1-2, open space would be increased from 0.3 acres on the existing Beach Cities Health District (BCHD) campus to 2.45 acres under the proposed Healthy Living Campus Master Plan.

The comment asserts that implementation of the proposed Project would result in illegal zoning. Refer to Master Response 7 – Project Compatibility with P-CF Zoning and Land-Use Designation for a detailed discussion and response to comments pertaining to this issue. For decades, BCHD has provided and facilitated a variety of free and low-cost programs and services to residents within the Beach Cities and nearby South Bay communities on the Project site. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue to reinvest revenue in community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain consistent and compatible with land use designation.

Comment AMG-2

The comments states that the proposed Assisted Living units are not geared to benefit local residents of the Beach Cities, and are instead expected to appeal to wealthier people presently living elsewhere. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to these concerns. It should be noted that BCHD retained the MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach. The analysis identifies that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area.

Comment AMG-3

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter AC1

April 13, 2021
Ann Cheung

Comment AC1-1

The comment expresses general opposition to the proposed Project and asserts that the Environmental Impact Report (EIR) dismisses most of the public comments/issues raised as either less than significant or less than significant with mitigation. Not only is this assertion incorrect, but the comment does also not identify or challenge any specific aspects of the thresholds, methodologies, or impact analyses provided in the EIR. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment also claims that the proposed Project grew in size. However, as described in Table 1-2, the 2019 Master Plan originally included 592,700 square feet (sf) of total occupied building area and the 2020 Master Plan now includes 484,900 sf of total building area, representing an approximately 18 percent decrease. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, it should also be noted that the height of the proposed Residential Care for the Elderly (RCFE) Building was adjusted from a maximum of 4 stories to a maximum of 7 stories in order to avoid locating large portions of the building along the eastern boundary of the Beach Cities Health District (BCHD) campus. This revision represents an effort to: 1) concentrate the majority of the building mass along Beryl Street, with a stepdown in building height provided by the Redondo Village Shopping Center; and 2) address construction-related concerns associated with the adjacency of the proposed RCFE Building to the residential neighborhood within the City of Torrance to the east.

Comment AC1-2

The comment expresses concern regarding impacts of construction noise and noise generated by outdoor activities during operation of the proposed Project. The comment correctly identifies that construction-related activities would result in significant and unavoidable for sensitive receptors located on-site and immediately adjacent to the campus. The EIR discloses this impact in Section 3.11, *Noise* under Impact NOI-1 and reduces this impact to the maximum extent practicable with the required implementation of Mitigation Measure (MM) NOI-1. Nevertheless, this impact would remain significant and unavoidable due to the inability of the noise barriers to reduce construction-

related noise to levels that would be below the Federal Transit Administration's (FTA's) thresholds identified in the EIR.

The comment asserts that post-construction activities would last late into the evenings. However, as described in Section 3.11, *Noise* under Impact NOI-3, operational noise activities – including outdoor function areas – would be less than significant with the implementation of MM NOI-3b, requiring the preparation and implementation of an events management plan, and MM NOI-3 limiting the hours for outdoor pool activities. These mitigation measures would ensure consistency with the noise ordinance requirements in the Redondo Beach Municipal Code (RBMC).

The comment does not challenge any specific aspects of the impact analysis in Section 3.11, *Noise* and does not provide any substantiating evidence to support its assertions related to noise impacts. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction and operational noise impacts.

Comment AC1-3

The comment expresses concern regarding congestion on surrounding streets and expresses opposition to proposed vehicle access along Flagler Lane. Refer to Master Response 13 – Transportation Analysis for detailed discussion of operational transportation impacts, including potential safety impacts. It should be noted that the exhaustive trip generation analysis determined that trip generation would be reduced following the implementation of Phase 1, but would increase slightly by 376 new daily trips as compared with existing conditions during Phase 2. Nevertheless, the impacts associated with operational traffic would remain less than significant as compared to the applicable thresholds (refer to Section 3.14, *Transportation*). It should also be noted that a Transportation Demand Management (TDM) plan is required by RBMC Section 10-2.2406, which requires a TDM plan for all nonresidential developments of 25,000 square feet (sf) or more. The TDM plan would also encourage visitors to travel to the campus via active (e.g., walking, biking, etc.) transportation, consistent with BCHD's mission to promote health and well-being.

The comment does not challenge any specific aspects of the analysis presented in Section 3.14, *Transportation*. Additionally, this comment does not provide any substantiating evidence to support its assertions.

The comment regarding opposition to vehicle access along Flagler Lane has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment AC1-4

The comment restates the commenters general opposition to the proposed Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter AC2

June 6, 2021

Ann Cheung

Comment AC2-1

The comment restates the commenters opposition to the proposed Project. Refer to Master Comment Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment AC2-2

The comment questions the need for the proposed Project, particularly with regard to the proposed Residential Care for the Elderly (RCFE) Building and Program of All-Inclusive Care for the Elderly (PACE) components of the proposed Project. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need for these components of the proposed Project. It should be noted that the Beach Cities Health District (BCHD) retained the MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. There are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located in any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services.

Comment AC2-3

The comment asserts that the Phase 2 development program is an incomplete plan. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic nature of Phase 2 of the proposed Project. As discussed in Section 1.1, *Overview*, the Environmental Impact Report (EIR) evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1 analyzed at a project-level of detail, and a development program for Phased 2 analyzed at a programmatic-level of detail. As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan. This approach is often common for lead agencies when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans available for later improvements. If, through the future development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, additional analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]).

Comment AC2-4

The comment expresses concern regarding impacts of construction and operational traffic on surrounding streets and states that the EIR provides no comprehensive detailed analysis of the RCFE and PACE daily commuters. Refer to Master Response 13 – Transportation Analysis for detailed discussion of transportation impacts associated with the proposed Project.

Despite the assertions in the comment, the EIR clearly does include comprehensive analysis of impacts to transportation that could occur as a result of the proposed Project. In fact, the EIR includes an exhaustive trip generation analysis that specifically identifies trip generation rates for the Assisted Living program and PACE components of the proposed Project, including residents, patients, visitors and staff. It should be noted that the trip generation analysis determined that trip generation would be reduced following the implementation of Phase 1, but would increase slightly by 376 new daily trips as compared with existing conditions during Phase 2. Nevertheless, the impacts associated with operational traffic would remain less than significant as compared to the applicable thresholds. These thresholds are for impacts measured by vehicle miles travel (VMT), which has replaced roadway capacity-based or automobile delay-based level of service (LOS) as

the metric for transportation impact analysis pursuant to Senate Bill (SB) 743 and the California Environmental Quality Act (CEQA) Guidelines (refer to Section 3.14, *Transportation*).

The trip generation rates for these uses, as well as the trip generation rates for the other uses included in Phase 1 and Phase 2 of the proposed Project, have been developed based on existing trip counts on the BCHD campus, trip counts for similar facility types, Institute of Transportation Engineers (ITE) trip generation rates, programming information provided by BCHD, and market feasibility studies. The trip generation and VMT estimates presented in the EIR in Section 3.14.3, *Impact Assessment and Methodology*, were prepared by Fehr & Peers, a well renowned professional transportation planning firm, using applicable and accepted technical methodologies. The comment does not challenge any specific aspects of this trip generation analysis or provide any substantiating evidence to further support its assertions.

With respect to construction-related impacts, the comment asserts that the analysis in Section 3.14, *Transportation* acknowledges that increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may temporarily disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of mitigation measure Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would identify designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. The Construction Traffic and Access Management Plan would address temporary traffic impacts that could occur during each construction activity. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation.

Comment AC2-5

The comment expresses concern regarding construction noise and air quality impacts and the effects construction would have on sensitive receptors. These issues are thoroughly addressed in the EIR (refer to Section 3.1, *Aesthetics and Visual Resources* and Section 3.11, *Noise*). Construction-related noise is identified as a significant and unavoidable impact in the discussion of Impact NOI-1. The comment does not challenge any of these analyses or provide any substantiating evidence to support or clarify the issues that have been raised. Refer to Master Response 10 – Air Quality Analysis and Master Response 12 – Noise Analysis for a detailed discussion and a response to comments pertaining to these issues.

Letter AW

June 9, 2021
Ann Wolfson

Comment AW-1

This comment expresses opposition to the proposed Project, and without substantiating evidence or expert opinion, states that the EIR is deficient because it minimizes impacts, makes assumptions, and omits data and analysis in key impact areas including aesthetics, land use, transportation, hazards and hazardous materials, noise, air quality, biological resources, and recreation. However, the comment does not challenge any of these analyses or provide any substantiating evidence to support or clarify the issues that have been raised.

Comment AW-2

The comment states that the description of the Phase 2 development program is vague, lacks proper visualizations, and results in an unstable program. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion and response to comments regarding the programmatic description and analysis of Phase 2 development program.

The comment further states, again without substantiating evidence and expert opinion, that the Environmental Impact Report (EIR) lacks substantive analysis of impacts to health and well-being of residents due to impacts related to the above stated impact areas. However, as described in the response to Comment AW-1, the comment does not challenge any of these analyses or provide any substantiating evidence to support or clarify the issues that have been raised. The EIR was prepared pursuant to the California Environmental Quality Act (CEQA) Guidelines and includes thorough, detailed analysis of impacts on all pertinent environmental issue areas, including impacts on air quality, noise, land use compatibility, and hazards and hazardous materials, which takes into consideration the potential effects on human health. Various comments – including Letter FL2 –

have provided links to studies, literature reviews, and other articles related to chronic stress. However, the vast majority of these studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. None of the referenced studies or articles conflict with the EIR's analysis or otherwise provide substantial evidence or expert opinion to suggest an element of the proposed Project would result in a significant environmental impact that was not fully analyzed and disclosed in the EIR.

Comment AW-3

The comment states that the project objectives described in the EIR provide restrictive assumptions, and that the project objectives are not public-focused or based on community needs. Refer to Master Response 4 – Project Objectives for detailed discussion and response to comments regarding the adequacy of the project objectives.

Comment AW-4

The comment states that the alternatives to the proposed Project are flawed because they do not include consideration of an alternative involving retrofit of the existing building. However, the EIR does include consideration and analysis of such an alternative. As described in Section 5.0, *Alternatives*, under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

Comment AW-5

The comment states the EIR should address the cumulative impact of the purported deficiencies described in Comment AW1 through AW4. However, as described in the response to Comment AW1, these comments do not challenge any specific aspects of the EIR. Additional discussion and responses to individual supplemental comments are provided in the responses to Comment AW-6 through AW-43.

Comment AW-6

The comment states that the proposed Project – including the Residential Care for the Elderly Building (RCFE) – is incompatible with surrounding neighborhoods due to the size and height of proposed development. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to building height and visual character. Aside from the subjective contention that the proposed RCFE Building would be incompatible, the comment does not contest the consistency of the proposed Project with the City of Redondo Beach policies and development standards, which, consistent with CEQA requirements, are the thresholds for the analysis of impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*). Although the height and mass of the proposed RCFE Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

Comment AW-7

The comment states that the placement, scale, and mass of the proposed RCFE Building would cause significant damage to surrounding neighborhoods and violates several policies of the City of Redondo Beach and the City of Torrance General Plans pertaining to visual character and compatibility of new development. The comment further states that the proposed RCFE Building would cause significant damage to blue sky views, loss of privacy for surrounding residents, generate new light and glare, create shadows affecting surrounding development, and obstruct sightlines. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to building height and visual character. Please also refer to Table 3.1-2 in Section 3.1, *Aesthetics and Visual Resources* for detailed discussion as to the Project’s potential to conflict with applicable policies of the City of Redondo Beach and the City of Torrance General Plans governing visual character and compatibility of new development. Specific issues related to Redondo Beach General Plan Policy 1.46.4 as well as Torrance General Plan Policy LU.2.1 and LU.3.1 are also addressed in the response to Comment TRAO-19.

The claim that the EIR lacks substantive analysis of potential impacts to aesthetics and visual resources is unfounded, particularly given the preparation of detailed computer-based photosimulations as well as shade and shadow analyses prepared by two licensed architects. Impacts to blue sky views, privacy, light and glare, and shade and shadows are discussed at length in the EIR. The comment does not challenge any specific thresholds, methodologies, or impacts identified in Section 3.1, *Aesthetics and Visual Resources*.

Comment AW-8

The comment asserts that the representative views selected for the analysis of aesthetics and visual resources are flawed because they demonstrate views from innocuous sites and were selected to justify proposed mitigation requiring a reducing in the height of the structure. As described in the response to Comment TRAO-17, the comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2. The impact to scenic views, which is the subject of the comment, would result from the height of the proposed RCFE Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane. Mitigation Measure (MM) VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. These six representative views, which were identified with input from the City of Redondo Beach, encircle the BCHD campus and provide west, southwest, south, and northeast facing views of the Project site (refer to Figure 3.1-1). Representative Views 2, 3, and 5 in particular provide views of the Project site from a distance of less than 100 feet that are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter's assertion that these views used in the analysis of visual impacts are innocuous locations or that the height of proposed development is underrepresented. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Comment AW-9

The comment states that the City of Torrance was not consulted on the selection of representative views, and that new views from the City of Torrance must be provided with City input. To fully and accurately assess potential impacts associated with aesthetics and visual resources, a total of six representative views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. Two of these representative views – Representative Views 1 and 2 – are located within the residential neighborhood located directly to the east of the Project site, within the City of Torrance, while Representative View 3 is located at the corner of Dominguez Park directly adjacent to City

of Torrance boundary. Many views elsewhere within the City of Torrance are often further away and views of the Project site are largely obstructed by existing development, trees, and power lines. These representative views were selected as they provide some of the greatest and most direct views of the Project site within the City of Torrance and are generally representative of similar views from other areas within the City of Torrance. CEQA Guidelines Section 15151 states that “[a]n evaluation of environmental effects of a proposed project need not be exhaustive...”. This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide “...a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations” (CEQA Guidelines Section 15151). Further, the analysis employed in this EIR for aesthetic and visual resources is informed by and consistent with the methodologies employed by other recent analyses prepared by the City of Redondo Beach and City of Torrance. In these other recent EIRs, which include the Solana Residential Development Project EIR and the Kensington Assisted Living Project EIR, the lead agencies characterize and depict views from only a handful of representative locations. For instance, the Solana Residential Development Project EIR prepared by the City of Torrance considered only seven key views from sites located directly adjacent to the proposed development site and included four visual simulations for views from nearby residences looking out across the site. Therefore, the representative views identified and utilized in the analysis of this EIR are considered adequate to inform the analysis of impacts to aesthetics and visual resources consistent with the CEQA Guidelines, and inclusion or consideration of additional representative views is not necessary.

Comment AW-10

The comment states that realistic photosimulations of the Phase 2 development program are missing, and must be included in order to adequately analyze impacts of the Project, including impacts from shade and shadows. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments regarding the level of detailed included in the analysis of the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the proposed Phase 1 site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions

for three representative example site plan scenarios, which are used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights.

Comment AW-11

The comment summarizes earlier statements about the sufficiency of the impact analysis and the findings of impacts on aesthetics and visual resources, particularly impacts on surrounding development and consistency with applicable policies of the City of Redondo Beach and City of Torrance General Plans. Please refer to responses to Comments AW-6 through AW-7 for detailed discussion and response to comments pertaining to these issues.

The comment notes that the residences to the east within the City of Torrance are subject to R-H Hillside and Local Coastal Overlay Zone, Section 37.41.1 Hillside and Coastal Zone. As described the individual response to Comment Letter RR3, it should be noted that the applicability of the Torrance General Plan – including the Torrance Hillside Overlay Zone – are discussed in the responses to Comment RR3-5 through RR3-7. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley – including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way – would require permits issues by the City of Torrance. As such, the consistency of these elements of the proposed Project were evaluated for consistency with the Torrance General Plan and TMC.

Comment AW-12

The comment summarizes earlier statements about the Project’s impact on open sky views and distant views of the Palos Verdes hills. Please refer to the response to Comment AW-8 for detailed discussion and response to comments pertaining to this issue.

Comment AW-13

The comment summarizes earlier statements about deficiencies in the EIR analysis with regard to details concerning the Phase 2 development program and lack of visual aids provided for this phase of the Project. Please refer to response to Comment AW-10 for detailed response to these concerns.

Comment AW-14

The comment requests the EIR provide photosimulations and other physical aids such as silhouettes, poles, and flag banners showing the height and mass of structures for Phase 1 and Phase 2. However, provision of additional simulations and other physical aids depicting the height

and mass of structures for Phase 1 and Phase 2 are not necessary to inform the analysis of impacts on aesthetics and visual resources. As previously described, the EIR analysis of impacts to aesthetics and visual resources is informed by detailed photosimulations prepared by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, for the Phase 1 preliminary site development plan. Photosimulations are often employed in the analysis of visual impacts in place of silhouettes, poles, or flag banners as they can provide an equally or more informative analysis than when utilizing silhouettes, poles, or flag banners. Similarly, as described in the response to Comment AW10, the analysis of the Phase 2 development program provides descriptions for three representative example site plan scenarios, which are used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects.

The comment requests that new key viewing locations selected in consultation with the City of Torrance be provided and, at a minimum, include views from: 1) Diamond Street & North Prospect Avenue Intersection, 2) Prospect Street & 190th Street Intersection, 3) Towers Elementary School, and 4) Diamond Street. However, for the following reasons, representative views from each of these locations were not selected to inform the analysis of aesthetics and visual resources in this EIR.

1. Diamond Street & North Prospect Avenue: Views from this location are already represented by Representative View 5, located approximately 240 feet to the northwest. Views from this location are also already qualitatively analyzed for the Phase 2 development program based upon representative views provided by Paul Murdoch Architects.
2. Prospect Avenue & 190th Street (Anita Street) Intersection: Views of the Project site from this location are distant and largely obstructed by traffic lights, street trees, and power lines. Representative View 4 was selected as it provides a much more direct view of the Project site from a similar view direction and better informs potential Project impacts on open sky views.
3. Towers Elementary School: Views of the Project site from this location are largely already represented by Representative View 3, located approximately 400 feet to the west and closer to the Project site. Representative View 3 (Dominguez Park) was selected as it provides a much more direct view of the Project site from a similar view direction.
4. Diamond Street: Views of the Project site from this location are largely already represented by Representative View 5, located immediately adjacent to the BCHD campus. Views from

Diamond Street are partially obstructed by existing residential development, trees, and power lines.

Refer to the response to Comment AW-9 for a detailed discussion and response to comments pertaining to request for additional representative views and consultation with the City of Torrance.

Comment AW-15

The comment recommends that substantial setbacks to proposed development towards the center of the Project site, combined with major reductions in height, would help to mitigated aesthetic and visual resource impacts. However, the comment fails to acknowledge the constraints associated with the proposed site plan. The continued operation of the Beach Cities Health Center is necessary to ensure revenue for programs and services provided by BCHD as well as funding for the completion of the development under Phase 1. As described in Master Response 9 – Aesthetics and Visual Resources Analysis, BCHD has revised the footprint of the RCFE Building to further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in height to the single- and multi-family residential development along Beryl Street.

Comment AW-16

The comment states, without substantiating evidence or expert opinion, that the EIR does not present detailed health impacts with regard to loss of sunlight, lack of privacy, glare, and nighttime lighting. However, the EIR includes detailed consideration and analysis of Project impacts with regard to each of these issues in Section 3.1, *Aesthetics and Visual Resources*, including detailed shade and shadowing modeling. Refer to Master Response 9 – Aesthetics and Visual Resources

Analysis for detailed discussion and response to comments regarding potential impacts associated with aesthetics and visual resources.

Comment AW-17

The comment states that the shade study must show hours ranges, and that the EIR does not address on-site after school activities such as Young Men's Christian Association (YMCA) daycare and athletic uses for American Youth Soccer Organization (AYSO) soccer practices that the comment claims would be negatively impacted by lack of sunlight. Master Response – Aesthetics and Visual Resources Analysis provides a detailed discussion and response to comments on the potential shade and shadow impacts associated with the proposed Project. As described therein, during the Fall and Winter, the proposed RCFE Building would also cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). However, as described under Impact VIS-4, none of the shade and shadows impacts would exceed the thresholds established in the EIR, which describe that a significant shade and shadow impact would occur “...if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).”

Comment AW-18

The comment states, without substantiating evidence or expert opinion, that the aesthetics and visual resources impact conclusions should be identified as significant. Please refer to the individual responses to Comment AW-6 through AW-17 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding potential impacts associated with aesthetics and visual resources.

Comment AW-19

The comment states that the EIR should be rejected and recirculated. However, no specific deficiencies in the analysis have been identified that would require recirculation of the EIR for additional public comment pursuant to CEQA Guidelines Section 15088.5.

Comment AW-20

The comment correctly summarizes that volatile organic compounds and perchloroethylene (PCE) was detected on the Project site. Additional discussion on hazards and hazardous materials

associated with the proposed Project is provided at Master Response 11 – Hazards and Hazardous Materials Analysis.

Comment AW-21

The comment states that the selection of boring sites is inadequate. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to concerns regarding the adequacy of the borings completed as part of the Phase II Environmental Site Assessment (ESA). This issue is also addressed in the response to Comment TRAO-120, which describes that no further soil boring sampling is necessary because the presence of contaminants has already been identified in the Phase II ESA.

Comment AW-22

The comment states that even with the best mitigation plans, there is a risk of accidental release of asbestos, lead, nuclear waste, polychlorinated biphenyls (PCBs), mold, and other materials that would be hazardous to human health through demolition of the existing development. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to concerns regarding construction-related impacts from hazards and hazardous materials, including the effectiveness of proposed mitigation in eliminating or reducing associated impacts.

With regard to nuclear waste, there is no evidence to suggest that nuclear waste would be disturbed during construction. All hazardous materials used operationally on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. The proposed Project would be subject to all of the requirements set forth in Chapter 4 (Small Quantity Generator Requirements) of the Health and Safety Code Medical Waste Management Act. Adherence to medical waste regulations for small quantity generators would ensure that impacts related to the storage, transport, and disposal of medical waste would be less than significant.

Comment AW-23

The comment states that additional, deeper borings and analysis should be done on the construction site due to the fact that PCE was found in 29 of 30 samples and that contamination is likely spready deeper and downhill the slope. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to issues regarding construction-related impacts from hazards and hazardous materials.

Comment AW-24

The comment states that additional study of the impact of natural occurrences such as heavy rains and winds on the potential to introduce hazardous substances into the air or stormwater systems should be conducted. However, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Therefore, with the implementation of the mitigation measures identified in the EIR (i.e., MM HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant. Implementation of these measures would ensure appropriate handling of soils on-site.

Comment AW-25

The comment states that additional study and reporting on the ramifications of human error or noncompliance with the appropriate guidelines should be provided. The EIR thoroughly describes the impacts associated with the potential exposure of contaminated soils to the environment as well as applicable mitigation necessary to reduce impacts. CEQA requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 requires that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the SCAQMD. Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

Comment AW-26

The comment states that additional information is needed on watering down of construction debris, contaminated soils, etc. However, MM HAZ-2a provides adequate details and discussion regarding mandatory watering of construction debris and contaminated soils. As discussed therein, during all working hours, stockpiled materials must be kept moist, and VOC-contaminated non-hazardous wastes must be immediately sprayed with water or suppressant and placed in a sealed container or directly loaded into a suitable transportation truck, moistened with water, and covered with a tarp of off-site transportation. Watering of VOC-contaminated non-hazardous waste is subject to compliance with the specific requirements outlined in SCAQMD Rule 116 Mitigation Plan, which further specifies that VOC-contaminated soil stockpiles and sprayed with water and/or approved vapor suppressants and covered with plastic sheeting for all periods of inactivity lasting more than one hour and that for VOC concentrations in soils exceeding 1,000 parts per million (ppm), watering occur as soon as possible, but not more than 15 minutes after excavation of the soils. In addition, pursuant to MM HAZ-2a, general construction best management practices must be implemented to contain and control storm water runoff that might convey contaminated or excessive sediments.

Regarding process for management of contaminated soils in the event of a landslide, the EIR and mitigation measures are not required to analyze such unanticipated and unlikely events. As described in Section 3.6, *Geology and Soil*, according to the California Geological Survey (CGS) Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone. Similarly, according to the Redondo Beach Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides. Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very low.

Comment AW-27

The comment requests that additional analysis for the stormwater drain system as it pertains to its impact on water conservation/nature preserves to the lower elevation in the east, such as Entradero Park in Torrance, be provided. However, as described in Section 3.9, *Hydrology and Water Quality* under Impact HYD-1, the proposed land cover and impervious surface types would be relatively similar to those currently on the Project site, but would result in an overall net reduction in impervious surface areas. Further, as discussed in Section 3.10, *Land Use and Planning*, the proposed Project would not conflict with any of the applicable plans, policies, or measures of the

City of Redondo Beach and City of Torrance General Plans or the RBMC and TMC related to water conservation and stormwater management. Ultimately, the proposed Project would not substantially affect operation or maintenance of downstream stormwater projects, including the stormwater basin located at Entradero Park, as the Project's estimated 20 percent reduction in permeable surfaces and associated reduction in stormwater runoff. As such, the proposed Project would not be anticipated to result in impacts on water conservation/nature preserves sustained through the City's stormwater system.

Comment AW-28

The comment states that air quality mitigation plans are not sufficiently discussed, nor are safeguards described. The comment further states that the mitigation plan does not provide sufficient detail for airborne contaminants and fugitive dust during periods of high wind, or the localized impact this would cause on nearby sensitive receptors. However, wind is considered as a part of the impact analysis and mitigation measures. For example, as described under Impact AQ-2, BCHD would be required to comply with SCAQMD Rule 403, which requires management of fugitive dust during construction activities. SCAQMD Rule 403, has specific provisions related to high wind conditions. Additionally, there is a specific provision in MM AQ-1 to "*prohibit demolition when wind speed is greater than 25 mph.*" Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments regarding construction-related air quality impacts and mitigation measures.

Comment AW-29

The comment provides a summary of the noise analysis presented in Section 3.11, *Noise*, and generally states, without substantial evidence or expert opinion, that this analysis is not sufficient. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding construction and operation noise impacts. It should be noted that specific noise levels experienced by the nearest sensitive receptors are described in Table 3.11-16 and Table 3.11-17. Some assertions made by this comment (e.g., Towers Elementary School students, staff, and visitors would experience hazardous noise) is not supported by the results of the exhaustive quantitative noise modeling effort.

Comment AW-30

The comment states that the analysis of noise is deficient due to the analysis being based on modeled average noise, rather than intermittent noise, and requests additional details regarding the health impacts on nearby sensitive receptors. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to comments pertaining to construction and operational noise

impacts. This response to comments provides a detailed explanation of the Federal Transit Authority (FTA) thresholds as well as the noise metrics that were used in the impact analysis.

Comment AW-31

The comment states that viable mitigation to noise, such as setbacks for structures and reductions in structure heights, was not considered in the EIR. However, as described in the response to Comment AW-15, the comment fails to acknowledge the site planning constraints associated with the existing Beach Cities Health Center. Additionally, the requested reduction in height to 30 feet would not provide sufficient space within the RCFE Building or the other structures proposed under the Phase 2 development program to meet the project objectives. Refer to Master Response 12 – Noise Analysis for additional detailed discussion and response to comments pertaining to construction related noise issues and mitigation measures.

The comment states that Alternative 6 is not a replacement for substantial setbacks. This comment has been noted; however, as described in Section 5.5.6, *Alternative 6 – Reduced Height Alternative*, this alternative is intended to reduce the potentially significant impact to scenic vistas if a reduction in building height in accordance with MM VIS-1 cannot be accommodated. This alternative does not describe a reduction in construction noise below the FTA thresholds. This analysis simply notes that “*the height of the RCFE Building under Alternative 6 would be reduced as compared to the proposed Project, as such the total duration of construction above the noise barrier would also be reduced.*”

Comment AW-32

The comment states that any significant and unavoidable impact affecting surrounding sensitive receptors is cause for the BCHD Board and approving City agencies to reject the proposed Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment AW-33

The comment states that the EIR omits analysis of impacts on recreation and recreational amenities, particularly impacts on recreation at Towers Elementary and Dominguez Park. However, the EIR does include consideration of impacts to recreation and recreational amenities in Section 4.0, *Other CEQA Considerations*. Pursuant to Appendix G of the CEQA Guidelines, impacts of a proposed project on recreational resources are characterized as:

- a) A resulting increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and
- b) The development of recreational facilities or the construction or expansion of recreational facilities which would result in adverse physical effects on the environment.

As described in Section 4.5, *Effects Found Not to Be Significant*, the proposed Project does not involve the development of recreational facilities and would not substantially increase demand on existing recreational facilities. As a result, the proposed Project would not cause a significant impact on recreation or recreational amenities and additional analysis of the topic is not required. Potential impacts on Towers Elementary and Dominquez Park are discussed in relevant sections of the EIR, including Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, and Section 3.14, *Transportation*, respectively.

Comment AW-34

The comment questions the EIR's findings regarding impacts on loss of mature trees and associated impacts on migratory birds, asserting that these impacts should be considered significant. However, as thoroughly discussed in Section 3.3, *Biological Resources*, while the proposed Project would result in the removal of approximately 20 landscaped trees along Flagler Lane, approximately 60 trees along the northern perimeter of the campus, and approximately 20 landscaped trees along Diamond Street. The Phase 2 development program would also require the removal of additional landscaped trees and shrubs within the interior portions of the existing BCHD campus. Despite the removal of these trees, the landscaping associated with the proposed would replace trees and shrubs with new vegetation that meets the landscaping regulations provided in RBMC Section 10-2.1900. Additionally, the proposed tree removal and landscaping along Flagler Lane would be conducted consistent with the Torrance Street Tree Master Plan. The proposed landscaping – including large landscaped trees and shade trees that are adapted to the climate of Southern California – would provide enhanced roosting or nesting habitat for resident and migratory birds. In addition, the implementation of MM BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged

(i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation.

Comment AW-35

The comment states that the Nesting Bird Report and Biological Evaluation prepared for the proposed Project is deficient in terms of both time and manpower, asserting that the duration of the field survey was insufficient to adequately document all biological resources present at the Project site. The Nesting Bird Report and Biological Evaluation was prepared by a qualified biologist with over 40 years of experience using approved survey methodologies. Further, it should be noted that the assessment of impacts on biological resources is not solely limited to those resources, particularly wildlife, in which a visual observation or occupation of the resource has been provided. The analysis of biological resources in Section 3.3, *Biological Resources* is also based on a review of the California Natural Diversity Database (CNDDDB) and the assessment of habitat on-site, even if a particular species was not observed. For example, based on these additional resources, Cooper's hawk (*Accipiter cooperii*) was also identified as having a high potential to occur on the Project site and is considered in the analysis of potential impacts associated with the proposed Project. It should also be noted, as described in the response to Comment AW-34, that the implementation of MM BIO-1 would require an additional nesting bird survey(s) if construction activities occur during the nesting season. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation.

Comment AW-36

The comment questions the credibility of the Nesting Bird Report and Biological Evaluation, noting a personal observation that there are a greater abundance of hummingbirds within the Project site than observed during the survey. Refer to the response to Comment AW-35 for detailed discussion and response to comments pertaining to special status species and nesting birds.

Comment AW-37

The comment notes that Cooper's hawk is included on the California Department of Fish and Wildlife (CDFW) Watch List and is commonly sighted in the area. Refer to the response to Comment AW-35 for detailed discussion and response to comments pertaining to special status species and nesting birds.

Comment AW-38

The comment states again that the Nesting Bird Report and Biological Evaluation is deficient, and requests that a larger study be conducted to thoroughly check all vegetation and trees with the single purpose of finding nests. Refer to the response to Comment AW-35 for detailed discussion and response to comments pertaining to special status species and nesting birds.

Comment AW-39

The comment states that creating an appropriate setback of structures and construction away from the edge of the property would help to saved fully mature old trees from removal. Refer to the response to Comment AW-34 above for detailed discussion and response to comments pertaining to the loss of trees.

Comment AW-40

The comment states that visual simulations and renderings of the proposed Project are deceiving, and requests that realistic sketches showing how the landscaping would look at the time of Project operation be provided. The foliage represented in the photosimulations, like the buildings also represented in these photosimulations, do not currently exist because the purpose of these photo simulations is to provide a visual aid for what future development would look like after construction is complete. As described in Section 3.3, *Biological Resources* and in response to Comment AW-34 above, future development at the Project site would include landscaping plans that would replace vegetation removed during construction with new vegetation that meets the landscaping regulations provided in RBMC Section 10-2.1900. Additionally, the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent with the Torrance Street Tree Master Plan. As such, because new trees and landscaping would be included in the final development, it is more accurate for visual aids to include landscaping than to omit foliage entirely.

Comment AW-41

The comment states that the description of the Phase 2 development program is vague and inconsistent, omits critical information, and lacks visualizations and drawings, making the proposed Project impossible to understand. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of Analysis for detailed discussion and response to comments pertaining to the level of detail presented for the Phase 2 development program.

Comment AW-42

The comment states that several viable alternatives to the proposed Project were not chosen or further explored that would be the most environmentally friendly alternatives. The alternatives presented by the commenter include an alternative that would involve solely the retrofit of the Beach Cities Health District, and an alternative for development of the RCFE Building at an alternative site. However, it should be noted Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space* explores a seismic retrofit – funded by a local bond measure – and Section 5.4, *Alternative Considered but Rejected from Further Analysis*, explores development on an alternate site. The alternative to develop on an alternate site was ultimately rejected due to the lack of sites and the economic infeasibility of purchasing a new site(s).

Comment AW-43

The comment restates the issues raised in Comment AW-42 and assert that retrofit of the existing Beach Cities Health Center would be the most environmentally sound option. The comment goes on to assert that development at an alternate site would provide greater access to services. Finally, the comment states that all of the alternatives currently have the RCFE positioned on the extreme edge of the northern and eastern site perimeter, and requests the EIR provided a detailed description and visual simulations of an alternative that provides greater setbacks. Refer to the response to Comment AW-42 regarding the consideration of a retrofit and development on an alternate site(s). Refer to the response to Comment AW-15 and AW-31 regarding the site planning constraints associated with the existing Beach Cities Health Center. These comments summarize the rationale for the development of the building footprint and the revisions to the proposed Healthy Living Campus Master Plan aimed at minimizing the building frontage along the eastern boundary of the BCHD campus.

Comment AW-44

The comment questions the appropriateness for the BCHD to serve as lead agency for the proposed Project. Refer to Master Response 2 – BCHD as Lead Agency for detailed discussion and response to comments pertaining to this issue.

Letter AN1

April 3, 2021
Anonymous

Comment AN1-1

The comment restates the commenter’s opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment AN1-2

The comment expresses general issues regarding potential hazardous noise impacts on residents and school children located in the vicinity of the Project site. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to construction-related noise impacts on nearby sensitive receptors. It should be noted that the EIR discloses and discusses a significant and unavoidable impact on sensitive receptors adjacent to the campus along Flagler Lane and Flagler Alley. However, construction-related noise at Towers Elementary School would be less than the Federal Transit Administration (FTA) thresholds identified in the EIR. As such, the construction-impact of noise on the indoor learning environment would be less than significant. The comment does not challenge any specific aspects of the quantitative impact analysis in Section 3.11, *Noise* or provide any substantiating evidence to further support its assertions.

Comment AN1-3

This comment expresses a general opposition to construction trucks on neighborhood streets. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the

City of Torrance for construction activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

The comment also briefly expresses concern regarding loss of views resulting from development of the proposed Project. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.1, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support or clarify its concerns. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to aesthetics and visual resources.

Comment AN1-4

The comment expresses general opposition to the proposed Project and suggests that there are many other plans where the proposed development could be sited. It is important to note that the EIR includes a thorough analysis of the potential for relocation of the existing Beach Cities Health District (BCHD) uses and development of proposed services and facilities to an alternative site. However, as described in Section 5.4, *Alternative Considered but Rejected from Further Analysis*, there are no sites that exist within the Beach Cities that are large enough to accommodate the proposed uses of the Project, are not currently occupied by other essential facilities, are currently zoned for uses consistent with those proposed under the Project, or are not constrained in other ways that would result in a similar or less degree of environmental impact. Additionally, even if a site were to become available, it may still be economically infeasible for BCHD to purchase a new site for the proposed development.

Letter AN2

May 23, 2021
Anonymous

Comment AN2-1

The comment states that all comments received by the Beach Cities Health District (BCHD) regarding the Draft Environmental Impact Report (EIR) must be included in the Final EIR as the public has a right to know all comments that were filed during the public comment period.

California Environmental Quality Act (CEQA) Guidelines Section 15204 suggests that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Nevertheless, consistent with CEQA Guidelines Section 15204[e]), all written and oral public comments, regardless of whether they address physical environmental issues, have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter AN3

May 23, 2021
Anonymous

Comment AN3-1

The comment requests any comments received by Beach Cities Health District (BCHD) that are not included in the Final Environmental Impact Report (EIR). Refer to the response to Comment AN2-1. Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15204(e), all written and oral public comments, regardless of whether they address physical environmental issues, have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter AN4

May 24, 2021
Anonymous

Comment AN4-1

The comment asserts, without substantial evidence or expert opinion, that various hazards would be present during construction of the proposed Project, including exposure to toxic materials during demolition, dust, noise pollution, new construction material pollution, and excess traffic, that would be exposed to nearby receptors. Each of these issues is thoroughly discussed within relevant sections of the Environmental Impact Report (EIR). For instance, Section 3.2, *Air Quality*, analyzes the potential impact that construction emissions, including particulate matter and fugitive dust, would have on air quality and the health of nearby sensitive receptors. This analysis is supported by exhaustive quantitative air emissions modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health

for projects in urban settings within the Greater Los Angeles Area. Section 3.8, *Hazards and Hazardous Materials*, presents an analysis of the potential impacts of the proposed Project resulting from worker exposure to construction material hazards and release of hazardous materials or contaminants to the general public and nearby sensitive receptors. This analysis is supported by the Phase I and Phase II Environmental Site Assessment (ESAs) as well as various other follow-up investigations. Section 3.11, *Noise*, presents a detailed quantitative analysis of noise impacts generated during construction activities on nearby sensitive receptors. Lastly, Section 3.14, *Transportation*, includes detailed discussion of potential impacts associated with roadway hazards, site access, effects on neighborhood cut-through traffic, and emergency access, supported by various transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Where applicable, the EIR includes appropriate mitigation necessary to reduce potential impacts associated with construction and operation of the proposed Project. The comment does not challenge any specific aspect of this analysis provided in the EIR.

Comment AN4-2

The comment asserts that removal of the existing building materials may involve hazards, and that dust and these hazards could be carried to surrounding neighborhoods and schools by wind. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for detailed discussion and response to concerns regarding construction hazard impacts. In addition to regulatory requirements and mitigation measures identified in Section 3.8, *Hazards and Hazardous Materials*. Additionally, the EIR also identifies Mitigation Measure (MM) AQ-1, which would require that all construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction. Implementation of these measures would reduce potential impacts from release or exposure to construction-related hazards to a less than significant level, preventing or avoiding impacts on the health of nearby sensitive receptors from occurring. Refer also to Master Response 11 – Hazards and Hazardous Materials as well as Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment AN4-3

The comment asserts that there have been several accidents in the Torrance Pacific South bay neighborhood and that Project construction traffic may exacerbate the number/frequency of accidents and post risk to school children and pedestrians walking or riding along nearby streets. Detailed discussion of the Project’s impact on traffic and roadway and pedestrian safety is presented in Section 3.14, *Transportation* under Impact T-3. As discussed therein, increased

construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. Construction activities could also result in potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity, and impacts are considered potentially significant. However, to avoid construction-related safety hazards, the EIR identifies MM T-2, which would require the preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation.

Comment AN4-4

The comment asserts that noise poses a hazard to nearby sensitive receptors. However, the comment does not challenge any specific aspect of the thresholds, methodology, or results of the exhaustive quantitative noise modeling provided in the EIR. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to comments pertaining to this issue.

Comment AN4-5

The comment asserts that noise, pollution, and traffic may also be a hazard to the Redondo Village Shopping Center and may be disruptive to business. Please refer to response to Comment AN4-1 through AN4-4 for detailed response to concerns regarding noise, air quality, and traffic impacts on nearby receptors and surrounding uses.

Comment AN4-6

The comment asserts, again without any substantial evidence or expert opinion, that additional traffic generated by the proposed Project may be disruptive and present a danger to existing traffic and pedestrians. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to comments pertaining to vehicle, bicycle, and pedestrian mobility and safety.

Comment AN4-7

The comment asserts, again without any substantial evidence or expert opinion, that additional traffic will increase noise along roadways in the vicinity of the Project site, including within nearby residential neighborhoods, that will affect the peace and quiet of the area. However, the comment fails to acknowledge that the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant.

The comment does not challenge the thresholds, methodology, or results of this operational noise modeling effort. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding traffic noise.

Comment AN4-8

The comment states that due to the size of the Project, the sea breeze into the Pacific South Bay neighborhood will be disrupted, and some homes and school might need to spend more on air conditioning as a result. However, the comment does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore wind patterns. Consistent with CEQA Guidelines Section 15204(b), “*if persons...believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant.*” Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment AN4-9

The comment states that property values for homes, particularly those closest to the Project site, would be adverse impacted. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis “*...identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “*significant effect on the environment*” as “*a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.*” Accordingly, the EIR analyzes the potentially significant adverse physical effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA.

Comment AN4-10

The comment generally states, again without substantial evidence or expert opinion, that there may be severe consequences to neighborhoods, schools, and the shopping center, and that it is unclear what benefit the people and businesses would obtain from the Project. Refer to the response to Comment AN4-1 through AN4-9 for a response to community issues related to neighborhoods, schools, and the Redondo Village Shopping Center. Refer also to Master Response 3 – Purpose

and Need and Master Response 4 – Project Objectives for a discussion of the underlying purpose and benefits of the proposed Healthy Living Campus Master Plan, which has been discussed in detail at numerous well-noticed public hearings

Comment AN4-11

The comment expresses opposition to the proposed Project and states that the proposed Project does not fit with the existing neighborhoods and schools and would create hazards and long-term quality of life impacts. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter AN5

June 15, 2021
Pacific South Bay Tract Homeowner

Comment AN5-1

The comment expresses general opposition to the proposed Project and states that current visual models and renderings of the Project are deceptive and do not represent views from adjacent neighborhoods, particularly the Torrance residential neighborhood east of the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to issues pertaining to the preparation of photosimulations and consideration of shade and shadows. As discussed therein, the analysis of aesthetic and visual resource impacts included the preparation of photosimulations depicted from representative views of the Project site from the surrounding area. Representative views include those from Tomlee Avenue (Representative View 1), Flagler Lane/Towers Street (Representative View 2), and Flagler Lane/Beryl Street (Representative View 3), which each representing views of the Project site from various angles and locations within the Torrance residential neighborhood located east of the Project site. The analysis of aesthetic and visual resource impacts also includes analysis of potential off-site shadow effects, as informed by shade and shadow simulations that were prepared for the proposed Project and presented in Appendix M. This analysis simulates shadows for the Summer Solstice, Autumnal (Fall) Equinox, and Winter Solstice at various times between sunrise and sunset. By modeling shadows for the Autumnal Equinox and the Summer and Winter Solstices, it is possible to see, understand, and analyze the worst and best-case scenarios of future shadow effects.

The comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support its assertions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For issues related to building height and neighborhood compatibility, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

Comment AN5-2

The comment expresses concerns regarding potential decreases in property valuation for nearby residences and inquires as to whether the Beach Cities Health District (BCHD) will provide compensation. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis “...identify and focus on the significant environmental effects of a proposed project” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “significant effect on the environment” as “...a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.” Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

Letter AN6

June 10, 2021
Anonymous

Comment AN6-1

The comment asserts, without substantial evidence or expert opinion, that the Environmental Impact Report (EIR) minimizes impacts and makes assumptions on most categories of the California Environmental Quality Act (CEQA), but focuses comments on analysis of aesthetics

and visual resources. The comment asserts that the proposed Project is incompatible with surrounding neighborhoods, claims that the proposed Project is not allowed under the Redondo Beach Municipal Code (RBMC) or the Torrance Municipal Code (TMC), and that the description of impacts on aesthetics and visual resources are wrong. However, the comment does not specifically challenge any aspects of the impact analysis included in Section 3.1, *Aesthetics and Visual Resources*, which is informed by photosimulations prepared by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, as well as renderings of the development under Phase 2 and a detailed shade and shadow analysis. The comment also does not challenge any specific aspect of the policy consistency analysis described under Impact VIS-2. As such, the assertion that the proposed Project was permanently ruin the surrounding neighborhood and the South Bay is wholly unsupported.

Comment AN6-2

The comment requests that the EIR address violations with City of Torrance General Plan Policy LU.2.1 and Policy LU.3.1, and City of Redondo Beach General Plan Policy 1.46.4. However, the comment does not provide any further detail regarding how or why the proposed Project violates these policies. Consistency with applicable policies of the City of Redondo Beach and City of Torrance General Plans is presented and analyzed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5. As presented therein, the proposed Project would not present any conflict with either of these three policies. Specific issues related to Redondo Beach General Plan Policy 1.46.4 as well as Torrance General Plan Policy LU.2.1 and LU.3.1 are also addressed in the response to Comment TRAO-19.

Letter AT

June 15, 2021
April Telles
112 Via El Chico
Redondo Beach 90277

Comment AT-1

The comment expresses opposition to the proposed Project and asserts, without any substantiating evidence or expert opinion, that it would not integrate well with the surrounding neighborhood and will block air flow and cast significant shadows. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This Environmental Impact Report (EIR) provides a primary source of environmental information for

the Beach Cities Health District (BCHD) Board of Directors and other responsible agencies exercising any permitting authority or approval power directly related to implementation of the proposed Project. However, it is not the purpose of an EIR to recommend approval or denial of the proposed Project. With regard to integration with the surrounding neighborhood and shade/shadows the comment does not challenge any specific aspects of the analysis provided in Section 3.2, *Aesthetics and Visual Resources* or any of the visual character analysis provided under Impact VIS-2 or the shade/shadow analysis provided under Impact VIS-4. Please refer to Master Response 9 – Aesthetics and Visual Resources Analysis for issues related to neighborhood compatibility and shade and shadows.

The comment also asserts that the proposed Project would block air space/flow, but does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore wind patterns. Consistent with CEQA Guidelines 15204(b), “...if persons...believe that the project may have a significant effect, they should:

(4) Identify the specific effect,

(5) Explain why they believe the effect would occur, and

(6) Explain why they believe the effect would be significant”

Comment AT-2

The comment states, without substantiating evidence or expert opinion, that traffic and noise impacts would be greatly increased during construction and operation of the development described for the proposed Healthy Living Campus Master Plan. The comment does not challenge any specific aspect of the analysis of construction and operational impacts provided in Section 3.14, *Transportation* or Section 3.11, *Noise*. In particular, the comment does not identify potential impacts in relation to the thresholds of significance identified for each of these environmental topic areas, which have been carefully applied to determine whether a potential impact is potentially significant or less than significant. For issues related to construction-related and operational transportation impacts, refer to Master Response 13 – Transportation Analysis. Additionally, for issues related construction-related and operational noise impacts, refer to Master Response 12 – Noise Analysis.

Comment AT-3

The comment asserts that construction activities associated with the proposed Project would result in negative health impacts related to air quality (e.g., inhalation of suspended particulate matter [PM₁₀]). As described further in Master Response 10 – Air Quality Analysis, the EIR includes

extensive quantitative analysis of air quality impacts on nearby sensitive receptors, both as a result of construction and operation of the development under the proposed Healthy Living Campus Master Plan. This analysis of criteria air pollutant emissions is supported by modeling results that rely on the South Coast Air Quality Management District's (SCAQMD's) California Emissions Estimator Model (CalEEMod) Additionally, the analysis of Toxic Air Contaminants (TACs) is supported by modeling results that rely on the U.S. Environmental Protection Agency's (USEPA's) AERMOD and the California Air Resources Board's (CARB's) Hotspots Analysis Reporting Program (HARP) Risk Assessment Standalone Tool. The comment does not challenge the methodology, assumptions, or results of these extensive modeling efforts that informed the air quality impact analysis in the EIR, which show that with the implementation of required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts to sensitive receptors would be less than significant when compared to the SCAQMD thresholds for criteria pollutant emissions and the CARB thresholds for TACs.

The comment also claims the proposed Project would generate significant greenhouse gas (GHG) emissions during construction and operation. However, as shown in Table 3.7-6 and 3.7-7, the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. As described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, the net reduction in annual operational-related GHG emissions is primarily attributable to decreases in mobile source GHGs over time as Federal and State combustion emissions standards become more stringent in future years. Emissions from mobile sources would decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards. As such, the proposed Project would not generate GHG emissions that may have a significant impact on the environment.

Comment AT-4

The comment expresses general concern over noise and vibration impacts under the proposed Project but does not provide any specifics regarding these concerns. For general issues related to noise and ground-borne vibration refer to Master Response 12 – Noise Analysis.

Comment AT-5

The comment expresses general concern over potential hazards and hazardous materials impacts, particularly construction-related impacts, under the proposed Project but does not provide any specifics regarding these concerns. For general issues related to hazards and hazardous materials refer to Master Response 11 – Hazards and Hazardous Materials Analysis.

Comment AT-6

The comment states that the proposed tree removal required for implementation of Phase 1 and Phase 2 of the proposed Healthy Living Campus Master Plan would result in an increase in carbon. The EIR includes adequate discussion of the potential impacts and mitigation of construction and operational GHGs in Section 3.7, *Greenhouse Gas Emissions and Climate Change* under Impact GHG-1. While the removal of trees may result in a short-term release of carbon into the atmosphere, as described in the response to Comment AT-4, the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. It should also be noted that while construction-related activities would require some tree removal, the landscaped vegetation would be replaced under the proposed landscaping plan.

Comment AT-7

This comment voices general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter ABP

June 15, 2021
Arlene & Bob Pinzler

Comment ABP-1

The comment raises general issues related to the project objectives, phasing of proposed improvements, likelihood that residents will be able to afford proposed uses, and a perceived lack of commitment for implementation of the Phase 2 development program. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the benefits of the proposed Project. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments pertaining to the affordability of Assisted Living and Memory Care units, particularly for residents of Redondo Beach. Lastly, refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to the proposed implementation of the Phase 2 development program.

Comment ABP-2

The comment raises general issues regarding the height of proposed structures and area of open space proposed between the 2019 and 2020 iterations of the proposed Healthy Living Campus Master Plan. As described in Master Response 9 – Aesthetics and Visual Resources Analysis, BCHD has revised the footprint of the RCFE Building to further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in height to the single- and multi-family residential development along Beryl Street.

The comment goes on to correctly state that these revisions to the 2019 Master Plan also resulted in a reduction in open space. However, as clearly described in Section 2.0, *Project Description* and shown in Table 1-2, open space would still be increased from 0.3 acres on the existing BCHD campus to 2.45 acres under the proposed Healthy Living Campus Master Plan.

Comment ABP-3

The comment asserts that even if the proposed Project were implemented, BCHD is not committed to the implementation of Phase 2. This comment does not address the adequacy of the EIR or its evaluation of physical environmental impacts. Section 2.0, *Project Description*, clearly describes the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. For these reasons the description of potential environmental impacts associated with Phase 1 and Phase 2 were very clearly described and delineated in the analysis. For example, air emissions, noise, and trip generation were independently calculated for Phase 1 and Phase 2.

Comment ABP-4

The comment asserts, without substantiating evidence, that the project objectives appear to persuade the reader that the proposed Project would be a natural extension of BCHD's mission, rather than describing an expansion of BCHD's mission and scope of services. The comment goes on to assert, again without substantiating evidence or expert opinion, that the proposed Project does not belong within a residential area on land that is owned by a public agency and zoned P-CF (Community Facility). Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the benefits of the proposed Project. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Comment ABP-5

The comment asserts, without substantial evidence or expert opinion, that the residents of Redondo Beach and Torrance would be subjected to construction and operational impacts from noise, dust, traffic disruption, poorer air quality, and visual blight that would be caused by implementation of the proposed Project. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. The comment further asserts, again without substantial evidence or expert opinion, that the majority of residents would not be able to afford to live within the proposed facilities, making the proposed Project an even less appropriate use of BCHD's property.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment ABP-6

The comment states that it is not within BCHD's scope of services to provide Assisted Living and Memory Care to seniors, stating that the proposed Project. As described in the response to Comment ABP-4, for decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. For example, a Conditional Use Permit (CUP) is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory Care Community. Implementation of the proposed Project would not substantially alter these land uses.

Letter BE

June 9, 2021
Barbara Epstein
Redondo Beach

Comment BE-1

The comment expresses general opposition to the proposed Project and asserts, without substantial evidence or expert opinion, that it would harm the neighboring communities and schools with unreasonable physical and mental health risks during the long construction process. The comment also asserts that the proposed Project would be too great a burden with no resulting benefit to the public. Potential impacts to sensitive receptors are described in detail within the relevant sections of the EIR, including, but not limited to Section 3.2, *Air Quality*, Section 3.11, *Noise*, Section 3.14, *Transportation*, etc. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

Comment BE-2

The comment states the Environmental Impact Report (EIR) is flawed, without providing any substantial evidence or details regarding how or why the EIR is flawed. Consistent with the requirements of the California Environmental Quality Act (CEQA), this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative

investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment BE-3

The comment states that the existing structures that have been deemed unsafe have many good years of service left. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to issues related to seismic safety. It should be noted that the No Project Alternative does consider continued operation of the existing facilities on the BCHD campus would continue to be operated until it becomes infeasible to do so due to financial issues or public safety issues.

Comment BE-4

The comment asserts, without substantial evidence or expert opinion, that the proposed structures are too high and large, and would impose unacceptable visual and sun blocking mass to the skyline at the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to visual character as well as shade and shadows.

Comment BE-5

The comment states that the City of Redondo Beach has been victimized by gifting public lands and assets to entrepreneurs for private gain. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the benefits of the proposed Project. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the project objectives. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit

the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Comment BE-6

This comment states that the Project has no value to the public, that the cost of senior care will be too high for anyone to afford, if senior care is necessary, it should be provided at basic cost and subsidized so any senior could afford it. See BCD Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments regarding the affordability of senior care facilities.

Comment BE-7

The comment states that if the existing buildings are unsafe, they should be taken down and the site planted with an urban forest, community garden, workout areas, and nature park to provide a healthy place for exercise, growing healthy food, and restful relaxation and mediation. Refer to the response to Comment FL1-25 for a detailed discussion and response to comments pertaining to this suggested alternative.

Comment BE-8

The comment asserts that the Project has advanced forward against the will of the public and should be abandoned. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter BP

June 9, 2021
Bonnie Pierce
1714 Huntington Lane #A
Redondo Beach, CA 90278

Comment BP-1

The comment expresses general opposition to the Project, asserting, without substantial evidence or expert opinion, that it is oversized and out of proportion to the area. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter BO-1

April 4, 2021
Brian Onizuka
5500 Block of Towers Street

Comment BO-1

The comment expresses general opposition to the Project. The comment states that there is heavy traffic from Towers Elementary School and any obstruction to Flagler Lane should not be considered. The comment goes on to describe that an alternate site should be considered. It should be noted that Section 3.14, *Transportation* provides a detailed discussion of existing cut-through traffic related to Towers Elementary School as well as description of the pilot program that is being implemented by the City of Torrance to address this issue. However, as described in Section 3.14, *Transportation* the implementation of the proposed Project would not exacerbate cut-through traffic or result in potential safety conflicts. It should also be noted that a discussion of alternate sites is provided in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter BW1-1

June 4, 2021
Brian Wolfson

Comment BW1-1 through Comment BW-37

The individual comments provided are identical to the Comments TRAO-39 through TRAO-66 as well as Comments TRAO-67 through TRAO-80. These comments are responded to individually in Letter TRAO.

Comment BW1-38

The comment asserts that the cumulative analysis presented in the Environmental Impact Report (EIR) is flawed because it paints an incomplete picture and fails to look at the full effect of other projects in the area. The comment provides specific reference to the Redondo Beach Police Department Shooting Range Upgrade project, asserting that the relevant facts and analysis is note

stated. This issue of the cumulative impacts is also identified and responded to in Comment TRAO-98 through TRAO-107.

With regard to the shooting range in particular, as described in the response to Comment TRAO-101, it should be noted that the Police Department Shooting Range is clearly identified as a cumulative project (refer to Table 3.0-1). This cumulative project is specifically referenced in the cumulative aesthetics and the cumulative hazards and hazardous materials analyses given the proximity of the site to the BCHD campus. As described in the cumulative impact analysis within Section 3.11, *Noise*, the proposed campus would be required to comply with the Redondo Beach and Torrance noise regulations and would not result in a potentially significant impact due to operational noise. Neither publicly available designs nor CEQA documentation for the Police Department Shooting Range were available at the time of the preparation of the EIR. Therefore, a quantitative noise analysis for the proposed shooting range was not available. Nevertheless, given that the proposed Project would comply with the requirements of the City of Redondo Beach and the City of Torrance noise ordinances, including all maximum permissible sound level requirements by land use type, the proposed Project would not substantially contribute to a cumulatively considerable noise impact.

Comment BW1-39

The comment asserts that the EIR fails to identify most of the associated cumulative impacts of the Dominguez Park improvements and the Redondo Beach Police Department Shooting Range Upgrade project. This issue is raised and responded to directly in Comment TRAO-107.

Comment BW1-40

The comment inaccurately asserts that the EIR analysis of cumulative impacts fails to consider the BCHD Bike Path Project. This issue is raised and responded to directly in Comment TRAO-100.

Comment BW1-41

This comment claims that the analysis fails to assess the cumulative impacts of the proposed Project on the Redondo Beach Historical Museum and the Morrell House, which are located in Dominguez Park. This issue is raised and responded to directly in Comment TRAO-104.

Comment BW1-42

The comment asserts that the redevelopment of the AES Redondo Beach Power Plant should be evaluated as a cumulative project. This issue is raised and responded to directly in Comment TRAO-99.

Comment BW1-43

The comment asserts that the EIR fails to say how BCHD staff assigned to the proposed 31,300 square foot (sf) Aquatic Center pool will be properly trained and fails to consider the impacts this component will have on Emergency Medical Service (EMS) and public safety. These issues are raised and responded to directly in Comment TRAO-107.

Comment BW1-44

The comment summarizes prior comments BW1-39 through BW1-43. Refer to the individual responses to Comments BW1-39 and BW1-43 for a further discussion.

Comment BW1-45

This comment asserts that the existing BCHD campus is an area of high cultural sensitivity and Native American monitoring is required for all ground-disturbing activities. MM CUL-1 requires the development of a Cultural Resources Monitoring Plan to be developed in coordination with representatives of the Native American tribes that consulted on the proposed Project pursuant to AB 52. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist and Native American tribal monitor shall be required during ground disturbing activities – including (but not limited to) clearing/grubbing, excavations, grading, and trenching – during the construction activities associated with Phase 1 and Phase 2 of the proposed Project.

Comment BW1-46

This comment asserts that BCHD has violated the Los Angeles Local Area Formation Commission (LAFCO) restrictions. This issue is raised and responded to directly in Comment TRAO-85.

Comment BW1-47

This comment states that the information provided for the proposed electrical substation is insufficient. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard a detailed discussion and response to comments pertaining to these issues. It should be noted that the comment does not provide any substantial evidence or expert opinion regarding the assertions that the proposed electrical substation would result in cancer-causing effects. Consistent with CEQA Guidelines Section 15204(b), “*if persons...believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant.*”

Nationally and internationally recognized scientific organizations and independent regulatory advisory groups have been organized to conduct scientific reviews of the EMF research and peer reviewed publications. Their ability to assemble experts from a variety of disciplines to review the full body of research on this complex issue gives their reports credibility. Without exception, these major reviews have reported that the body of data, as large as it is, does not demonstrate that exposure to power-frequency magnetic fields causes cancer or poses other health risks, although the possibility cannot be dismissed. Because of the uncertainty, most reviews recommend further research, and, appropriately, research is ongoing worldwide. The weakness of the reported epidemiological associations, the lack of consistency among studies, and the severe limitations in exposure assessment in the epidemiological studies, together with the lack of support from laboratory research, were key considerations in the findings of the scientific reviews. Additional information is provided in *Understanding electric and magnetic fields*, which can be found here: https://www.sdge.com/sites/default/files/final_emf_s1510006_eng.pdf.

Pursuant to CEQA Guidelines Section 15151, “[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.”

The comment goes on to assert that the hazardous impacts associated with trenching are not sufficiently explained. This issue is addressed in detail in Section 3.8, *Hazards and Hazardous Materials*. The proposed trenching would disturb soils contaminated with tetrachloroethylene (PCE), however, as described in detail under Impact HAZ-2, PCE generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). With the implementation of the Mitigation Measures (MM) HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant.

Letter BW2

June 8, 2021
Brian Wolfson

Comment BW2-1

The comment introduces the comment letter and attachments, including an excerpt of California Environmental Quality Act (CEQA) Section 15088.5. This comment has been noted.

Comment BW2-2

This individual comment is identical to and responded to in response to Comment BW2-1.

Comment BW2-3

The comment provides a summary of the proposed Project and notes that Phase 2 is programmatic in nature and is not currently funded. As described in Master Response 6 – Financial Feasibility/Assurance, while funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the RCFE Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory Care community as well as the Program of All-Inclusive Care for the Elderly (PACE) within the Residential Care for the Elderly (RCFE) Building. In addition, the Beach Cities Health District (BCHD) would continue to be able to seek and secure appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

Comment BW2-4

The comment asserts that the Beach Cities Health Center does not require seismic retrofit and BCHD is only interested in generating revenue from the Project. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential public safety hazard for future building tenants,

patients, and residents, the BCHD Board of Directors prioritized elimination of seismic-related hazard in concert with the proposed redevelopment of the Healthy Living Campus.

With regard to revenue generation specifically, it should be noted that the project objectives do not attempt to disguise that the development under the proposed Healthy Living Campus Master Plan must be financially viable. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission. Revenues from the long-term tenant leases support BCHD programs and services. As such, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs.

Comment BW2-5

The comment incorrectly claims that the proposed Project is incompatible based on the City of Redondo Beach's and City of Torrance's regulations, policies, and design guidelines governing aesthetics and visual resources. The proposed Project would be consistent with RBMC Section 10-2.622, which includes maximum height limits along with other development standards for the C-2 zone designation that governs the vacant Flagler Lot. The RBMC does not specify building heights or floor area ratios (FARs) for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for additional discussion and response to comments pertaining to building height and neighborhood compatibility.

Comment BW2-6

The comment states that the EIR inaccurately describes the visual resources that make the area unique and fails to recognize views that lead up to the marina as well as landmarks such as the Portofino Hotel. The comment continues that there are "*several unique view corridors within the area that extend between streets to provide unfettered views of the bay and sunsets.*" It should be noted that views of the bay and the Portofino Hotel are from view points located north, west, or south of the Project site. Given the topography of the area, views of the bay to the west are not available from viewpoints to the east of the Project site, and the proposed Project would not obstruct views of the ocean.

The comment goes on to claim that due to the size of the Project, it would alter panoramic public views from the Wilderness Park and other high points, such as the Palos Verdes hills. The comment provides a picture that appears to be taken from Hopkins Wilderness Park through a tree towards

the Project site. It should also be noted that the EIR describes views “*of*” the Palos Verdes hills as a significant visual resource in the Project vicinity, rather than views “*from*” the Palos Verdes hills towards the Project site, which are not identified as an important scenic vista in the City of Rancho Palos Verdes General Plan. Scenic vistas identified in the City of Rancho Palos Verdes General Plan include views towards the City of Torrance to the northwest and views facing the Pacific Ocean.

Comment BW2-7

The comment claims that the proposed rooftop dining area located in the RCFE Building and the proposed access along Flagler Lane would be in violation of the zoning codes of the cities of Redondo Beach and Torrance. The Healthy Living Campus Master Plan architectural drawings for the proposed RCFE Building were developed by Paul Murdoch Architects with careful review of the RBMC. There are no such provisions in the code for P-CF or C-2 that would seem to prohibit the proposed rooftop garden. Nevertheless, pursuant to the RBMC Section 10-2.1806, the proposed Project will undergo a Planning Commission Design Review and BCHD will make changes to the plan, if necessary.

Regarding the proposed driveways along Flagler Lane, Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

Comment BW2-8

The comment claims that the EIR does not analyze the impacts to privacy regarding the multi-family residential buildings adjacent to the north of the site and that the RCFE Building would provide “direct sight lines into private interior living spaces of these residences.” The comment incorrectly claims that this must be analyzed in the EIR. As described in Section 3.1.3, *Impact Assessment and Methodology*, only public views, not private views, need be analyzed under CEQA. In 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views are not considered under CEQA (Public Resources Code Section 21082.2). Nevertheless, Master Response 9 – Aesthetics and Visual Resources provides a detailed discussion and response to comments pertaining to privacy. Notably, while residential areas would still be visible from some areas of the BCHD campus after development of the proposed Project, the vertical and horizontal

distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

Comment BW2-9

The comment suggests that the EIR as well as BCHD lack consideration of public input and the public review process. The comment also claims that BCHD has misled residents “to get what they want” and uses their “political capital” in order to get “special treatment” and operate “above the law.” These comments do not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” However, the EIR thoroughly discusses the public participation process that BCHD has engaged in since the start of the Project in 2017. As discussed in Section 1.6, *Project Background*, BCHD formed the 20-person CWG to engage local participants in the planning of a modernized campus that would be integrated with the surrounding community including Redondo Beach and the Torrance. The CWG held 17 meetings to discuss various components of the proposed Healthy Living Campus Master Plan and was eventually dissolved in December 2020 following the conclusion of the preliminary planning and design phases for the proposed Healthy Living Campus Master Plan.

BCHD staff also conducted outreach for the proposed Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan. Study circles (i.e., informal group sessions) were comprised of diverse stakeholders from Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach and were designed to encourage local input into the planning process for the proposed Healthy Living Campus Master Plan. BCHD also held two community Open House events in November 2017 and March 2019 to inform community members and key stakeholders of the plans being considered. Open House events also provided an opportunity for attendees to ask questions and contribute comments. The first Open House introduced the proposed Healthy Campus Master Plan and provided nine informational stations, including but not limited to About BCHD, Project Overview, Community Need, EIR Process, and CHF. The second Open House provided the general public with an updated description of the

Healthy Living Campus project, visualizations of its design, walking tours of the campus and opportunities for public involvement.

The public was provided an opportunity to comment on the scope of the EIR through a NOP which was made available to Federal, State, and local agencies and interested members of the public through various methods. The NOP was advertised to the general public electronically on the BCHD website and monthly calendar, via news releases, and posters placed in the BCHD Community Services office and CHF. Physical copies of the NOP and IS were delivered to public libraries including Redondo Beach Main, North Branch, Hermosa Beach, Manhattan Beach, and Isabel Henderson branch in Torrance. The NOP and IS were also distributed to the Governor's OPR, school superintendents, and City Councilmembers in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach. The NOP comment period ran from June 27, 2019 to July 29, 2019. During this comment period, BCHD held five public scoping meetings in July 2019, including one in Manhattan Beach, one in Hermosa Beach, two in Redondo Beach, and one in Torrance. Comments made during the comment period for the NOP were considered and addressed during EIR preparation (refer to Section 1.8, *Areas of Known Controversy* and Appendix A).

The refined Healthy Living Campus Master Plan as analyzed in this EIR was developed from more than 60 meetings over 2 years attended by more than 550 community members and drawing more than 1,000 comments regarding individual elements of the Master Plan (refer to Table 1-1 for a timeline of key community outreach events associated with the proposed Project). Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a full discussion of previous revisions to the Project in response to public comments as well as building height and neighborhood compatibility.

With regard to claims that BCHD has misled the public and operates “*above the law*,” these claims are unfounded and unsubstantiated. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

Comment BW2-10

The comment asserts that individual residents who purchased property in the Project vicinity over the last 60 years did not know that the public views and aesthetics would be “*for sale*” or could be “*eliminated*.” This comment does not pertain to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment BW2-11

The comment quotes several segments of the EIR's aesthetics and visual resources analysis, particularly with regard to the Project's impact to open sky views from various representative views, and repeatedly claims the EIR does not address or mitigate these impacts. As described in detailed in Master Response 9 – Aesthetics and Visual Resources Analysis, the environmental impact analysis provided in the EIR acknowledges that the proposed RCFE Building, when viewed from Representative Views 2, 3, and 4, would be located closer to the edges of the BCHD campus and would appear substantially taller with substantially more massing than the existing buildings on the campus as well as the other existing buildings. However, the building would be partially screened by existing large canopy trees along Beryl Street. The proposed landscaping surrounding the RCFE Building would also provide some screening to soften views of the Project site's street frontage from this location. While the massing of the proposed RCFE Building would be greater than existing conditions, the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from this location. Additionally, MM VIS-1, which would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) to approximately 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot), would further reduce impacts related to loss of open sky views in the Project vicinity.

The comment also asserts that the EIR does not include an assessment of or clear visual aids for the visual impact of the proposed Phase 2 buildings. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program. As described therein, a program EIR generally analyzes a project for which less specific detail is currently known, but would be developed at a later date.

The visual impact analysis relies on the best available information for the Phase 2 development program. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and

maximum building heights. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (CEQA California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Comment BW2-12

The comment describes community concerns related to private views, stating they will “*lose their right to privacy without just compensation or due process.*” Refer to Comment Response BW2-11 and Master Response 9 – Aesthetics and Visual Resources Analysis for discussion and response to comments pertaining the privacy issues.

The comment continues by stating that the proposed Project would cover other properties in shade for hours each day and affect rooftop solar collectors in the vicinity. As described in Master Response 9 – Aesthetics and Visual Resources Analysis, the EIR provides a detailed analysis of Project impacts to shade and shadow on sensitive shade receptors in the vicinity, including residential receptors and solar collectors.

Comment BW2-13

The comment asserts that MM VIS-1 is flawed, stating that the mitigation measure is subjective and lacks sufficient data to be conclusive. MM VIS-1 is not subjective and is based on a Sight Line Study prepared by VIZf/xx As described under Impact VIS-1 in Section 3.1, *Aesthetics and Visual Resources*, the Sight Line Study prepared by VIZf/x determined the RCFE Building would need to be reduced in height by 20 feet and 3 inches in order to remain below the ridgeline of the Palos Verdes hill from Representative View 6. A visual aid graphic is also provided therein to demonstrate the height reduction required to remain below the ridgeline of the Palos Verdes hill from Representative View 6. With implementation of MM VIS-1, the proposed RCFE Building

would be reduced at least 82.75 feet above existing campus ground level and 113.25 feet above the vacant Flagler Lot below, and impacts would be less than significant with mitigation.

Comment BW2-14

The comment claims that the Project conflicts with Policy 1.46.5 of the Redondo Beach General Plan, the Project would have a significant visual impact on the area, and that BCHD has no authority to alter views of the open sky, Pacific Ocean, and Palos Verdes ridgeline, which are recognized as important visual resources. Policy 1.46.5 of the Redondo Beach General Plan states “[r]equire, where the City has jurisdiction, that public sites be designed to incorporate landscaped setbacks, walls, and other appropriate elements to mitigate operational and visual impacts on adjacent land uses.” As described in Table 3.1-2 under Impact VIS-2, the proposed buildings would meet the setback requirements prescribed for development in a parcel zoned for C-2. Additionally, the proposed Project would be subject to a Planning Commission Design Review, consistent with requirements for development in a parcel zoned for P-CF. The proposed RCFE Building has been sited along the northern perimeter of the Project site behind the Redondo Village Shopping Center. This would create a terraced effect with the building height decreasing from the campus to the Redondo Village Shopping Center and ultimately further down to the residential land uses on the north side of Beryl Street. This proposed orientation would reduce the perceived bulk, mass, and scale of development when viewed from Beryl Street. Additionally, the location of the proposed RCFE Building along the northern perimeter of the Project site would reduce the visual impact on the adjacent land uses to the west along North Prospect Avenue and to the east in the Torrance neighborhood. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening and soften the views of the campus (refer to Figure 2-9). Similarly, the northern border of the campus would be lined with shade and flowering ornamental trees to soften the views from the Redondo Village Shopping Center. The Planning Commission Design Review would further refine the final design of Phase 1 and Phase 2 such that the proposed development would be consistent with the objectives and policies in the Redondo Beach General Plan Land Use Element including Policy 1.46.5.

The comment again asserts that BCHD must be required to provide visual aids to evaluate impacts associated with Phase 2 of the Project. Refer to Comment Response BW2-12 and Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program.

Comment BW2-15

The comment incorrectly claims that the EIR fails to disclose the potential for light impacts associated with Phase 2 development of the Project. The comment fails to acknowledge the discussion of light impacts disclosed for both Phase 1 and Phase 2 of the Project, which is provided under Impact VIS-3 in Section 3.1, Aesthetics and Visual Resources.

The comment again asserts that the analysis of visual impacts associated with Phase 2 of the Project is insufficient. Refer to Comment Response BW2-12 and Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program.

Comment BW2-16

The comment asserts that the proposed Project would significant increase air, noise, and light pollution and incorrectly claims the EIR does not assess potential air quality impacts on the commercial uses located adjacent to the north of the site. Impacts associated with localized air emissions are assessed in Section 3.2, *Air Quality*. As described in Section 3.2.3, *Impact Assessment and Methodology*, CO and NO₂ LST thresholds apply to both residential and off-site worker receptors (i.e., people who work in businesses off-site). PM₁₀ and PM_{2.5} LST thresholds are relevant to sensitive receptors that are reasonably likely to be present for 24 hours or longer. Since off-site worker receptors are not expected to be present for this duration, PM₁₀ and PM_{2.5} LST thresholds do not apply to off-site worker receptors. As described under Impact AQ-2, off-site worker receptors include employees within the Redondo Village Shopping Center to the north of the Project site. Table 3.2-6 provides the estimated unmitigated localized on-site construction emissions for sensitive residential receptors as well as employees within the Redondo Village Shopping Center (off-site worker receptors) compared to LSTs for receptors located within 25 meters from the Project site. As described therein, localized construction emissions would not exceed CO and NO₂ LST thresholds for off-site worker receptors during construction associated with Phase 1 and Phase 2 of the proposed Project. As described in Table 3.2-7, implementation of MM AQ-1, which would require preparation and implementation of an Air Quality Management Plan, would further reduce localized construction emissions at sensitive receptors, including off-site worker receptors during Phase 2 construction. Therefore, the EIR thoroughly discloses and addresses the potential impacts associated localized construction emissions at off-site worker receptors.

The comment also claims mitigation measures provided in Section 3.2, *Air Quality* do not provide details of enforcement or penalties for failure to comply with the mitigations. The Air Quality

Management Plan would be subject to review and approval by the cities of Redondo Beach and Torrance prior to issuance of demolition, grading, or building permits for the Phase 1 preliminary site development plan or the Phase 2 development program. MM AQ-1 has been revised to further clarify the enforcement capabilities of the City of Redondo Beach. Construction contractors would be required to ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD would be required to demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction.

Comment BW2-17

The comment states that the determination of compliance with Policy LU.4.3 of the Torrance General Plan should be revised due to the potential conflict with TMC Section 92.30.8. Policy LU.4.3 states *“Require that new development projects provide their full fair share of the improvements necessary to mitigate project generated impacts on the circulation and infrastructure systems.”* Table 3.10-6 in Section 3.10, *Land Use and Planning* acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

The comment also notes that additional traffic would increase impacts associated with air quality, “harming humans, pets, and wildlife in the vicinity.” The EIR thoroughly describes and addresses air quality impacts related to Project operational activities in Section 3.2, *Air Quality*. Potential impacts to wildlife are addressed in Section 3.3, *Biological Resources*.

Comment BW2-18

The comment asserts that the EIR must revise Policy LU.9.1 in Table 3.10.5 to note that the native plant species proposed for landscaping attract coyotes, as identified in the City of Torrance’s *“coyote abatement strategy.”* This comment provides no reference for the *“coyote abatement strategy”* and no such plan is available online for the City of Torrance. It is important to note that while the City of Torrance has published a 2019 Coyote Management Plan, this plan does not identify an issue with native landscaping attracting coyotes. The only reference to landscaping in this plan is the statement that homeowners should *“Trim vegetation to reduce hiding places and potential denning sites.”*

Refer to Comment Response PF-20 for discussion and response to comments pertaining to the proposed landscaping plan and concerns related to coyotes.

Comment BW2-19

The comment states that the determination of compliance with Policy LU.11.9 of the Torrance General Plan should be revised due to the proposed landscaping improvements along the Torrance Hillside Overlay. The comment further claims that the landscaping improvements would result in significant environmental impacts to the residences adjacent to the east of the Project site. However, it is important to note that activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way. The City of Torrance's jurisdictional land use boundary does not extend further into the campus. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are addressed in Section 3.10-5. Consistency with individual policies will also be considered by the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way.

Comment BW2-20

The comment claims that the proposed Project must be moved west and that the No Project Alternative is the best alternative. These comments do not pertain to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, comment has been noted and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment BW2-21

The comment expresses concern regarding operational noise levels associated with a party patio atop the PACE center in the RCFE Building. It should be noted that no such party patio is proposed as part of the Project. The Project proposes a Garden Roof Deck above the northern portion of the RCFE Building as shown in Figure 2-7, Open Space and Landscaping. Further, operational noise levels are thoroughly disclosed and discussed in Section 3.11, *Noise*. With regard to community events within the publicly accessible open space, all applicable permits would be obtained from the City of Redondo Beach, as necessary. Additionally, consistent with MM NOI-3b an Events Management Plan would be prepared and implemented to ensure consistency with the Redondo Beach and Torrance noise ordinances.

Comment BW2-22

The comment asserts that the operational noise levels associated with proposed community events at the Project site would “*permanently change the character of the neighborhood*” and suggests the mitigation measures proposed to control operational noise levels are “*insufficient and prone to human error.*” However, the comment does not challenge any aspects of MM NOI-3a through -3c and does not provide suggestions to make the mitigations “sufficient.” Implementation of MM NOI-3b would require BCHD to prepare an Events Management Plan to include, but not be limited to, establishment of procedures to limit noise generated by operations on the proposed BCHD Healthy Living Campus, particularly for outdoor events. The Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the RBMC and TMC. Limitations on outdoor events shall include prohibiting the use of amplification systems for outdoor events after 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria and review of the proposed sound system by a qualified acoustical engineer to ensure that event set ups would meet the acceptable exterior noise criteria of 50 to 55 dBA consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2. Therefore, implementation of MM NOI-3b would ensure noise levels from outdoor dining spaces, fitness classes, and community events do not occur after 10:00 p.m. consistent with RBMC Section 4-24.401 and TMC Section 6-46.7.2. Compliance with RBMC Section 4-24.401 and TMC Section 6-46.7.2, as well as the implementation of MM NOI-3b, which would require preparation of an Event Management Plan, would reduce noise impacts related to outdoor events to less than significant with mitigation. Additionally, MM NOI-3c (Outdoor Pool Activities) would require the proposed Aquatics Center to close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria, which would further reduce operational noise impacts. As such, the mitigation measures established in Section 3.11 sufficiently mitigate operational noise to levels below significance.

Comment BW2-23

The comment asserts that if an alternative location for the Project is infeasible, BCHD “*must redevelopment cannot be moved to another site the Lead Agency must identify specific steps to ensure on-site or off-site creation, enhancement, restoration, and/or protection and management of ancestral lands in perpetuity.*” The comment also asserts that the EIR should be revised to state that the Project site is located on Native American land. Section 3.4, *Cultural Resources and Tribal Cultural Resources* describes that the Gabrieleño/Tongva occupied territory that included the Los Angeles Basin south to parts of Orange County and north to Topanga Canyon and the southern Channel Islands.

MM CUL-1 requires the development of a Cultural Resources Monitoring Plan to be developed in coordination with representatives of the Native American tribes that consulted on the proposed Project pursuant to AB 52. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist and Native American tribal monitor shall be required during ground disturbing activities – including (but not limited to) clearing/grubbing, excavations, grading, and trenching – during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary. Therefore, implementation of MM CUL-1 sufficiently addresses the potential for impacts to tribal cultural resources during ground-disturbing construction activities associated with the proposed Project.

The comment further asserts that “*site monitors are an insufficient mitigation measure*” and that greater mitigations are needed, such as a stop work order if artifacts are discovered and a “*clear method for reporting concerns, filling complaints, and determining damages for noncompliance.*” The comment fails to acknowledge that MM CUL-2 would require a qualified professional archaeologist and approved Native American monitor be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological and/or tribal resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than 50 feet from the find. The qualified archaeologist and/or Native American monitor shall evaluate the significance of the discovery based on the Treatment Plan prior to resuming any activities that could impact the discovery. All tribal cultural resources unearthed by ground disturbing activities shall be evaluated by the Native American monitor. Any required testing or data recovery shall be directed by the qualified archaeologist and Native American monitor pursuant to the Treatment Plan.

The comment also suggests that mitigation measures to address air quality impacts would conflict with the provisions required by unspecified cultural mitigations. However, the comment does not specify mitigation what mitigation measure would cause a conflict.

Comment BW2-24

The comment describes the provisions of CEQA under Section 15123, which require identification of areas of controversy known to the lead agency and a summary of the proposed actions and its consequences, including proposed mitigation measures. The EIR thoroughly discloses and discusses the areas of controversy known to BCHD in Section 1.8, *Areas of Known Public Controversy*. A summary of the EIR, including the determination of impacts and proposed mitigation measures is provided in the Executive Summary.

The comment incorrectly claims that the EIR discounted and never addressed the public concern regarding impacts. Contrary to this assertion, the summary provided in Section 1.8, *Areas of Known Public Controversy*, clearly complies with the intent of CEQA Guidelines Section 15123, which is referenced in the comment and states that “[a]n EIR shall contain a brief summary of the proposed actions and its consequences.” The summary provides approximately 2 pages of bulleted issues that were known to be of concern during the preparation of the EIR. Additionally, as described in Section 1.8, *Areas of Known Public Controversy*, all comments letters received on the NOP were also provided as Appendix A to the EIR. Each of these comment letters was reviewed and marked up to identify individual environmental issues. Each of these issues was considered and responded to during the preparation of the environmental impact analysis provided in the EIR. The assertion that BCHD “discounted the public controversy created by the Project and never addressed the concerns” is unfounded.

Letter BW3

June 4, 2021
Brian Wolfson
City of Torrance

Comment BW3-1

The comment provide an introduction to the following comments which assert why the Environmental Impact Report (EIR) is inadequate and incomplete and lacks sufficient mitigation. Detailed response to each of the discrete comments provided in this letter are presented in the following responses. It should be noted that the issues raised in Comment BW3-2 through BW3-4 were also raised and directly responded to in Comment TRAO-80.

Comment BW3-2

The comment incorrectly claims that the trip generation rates for the proposed Aquatic Center in Phase 2 were not completed by Fehr & Peers and that the analysis uses “preliminary” findings.

As described in Section 3.14.3, *Impact Assessment and Methodology*, while the *Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition* does describe trip generation estimates for gyms and fitness centers, it does not include trip generation estimates that are specific to “*aquatic centers.*” Therefore, Fehr & Peers used the results of the market feasibility analysis prepared by Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies, to estimate potential trip generation. Critical factors that were considered in developing the trip generation rates for the proposed Aquatic Center in Phase 2 included: the populations of the Beach Cities; the proportions of frequent, infrequent, and occasional swimmers, and the estimated market capture based on the size of the facility and the type of pool(s) that it would provide. The use of this market study by Fehr & Peers to develop trip generation rates for the proposed Aquatics Center in Phase 2 is entirely in keeping with ITE’s recommendation to utilize local data where it is available. The methodology for the development of trip generation rates is described in detail in the Vehicle Miles Traveled Study (see Appendix K). The trip generation methodology is provided as Appendix A of the study and the Ballard*King & Associates Market Feasibility Evaluation is provided as Appendix C of the study.

Comment BW3-3

The comment states that the South Bay Aquatics Center was not used to develop aquatic center trip generation estimates because it had not been operating with regular class schedules due to the COVID-19 pandemic. This statement is correct, which led to the use of the market feasibility analysis prepared by Ballard*King & Associates to prepare the trip generation estimates (refer to Comment BW3-2).

It should be noted that while the comment attributes these statements in Appendix J to Ballard*King & Associates, the trip generation methodology presented in Appendix K and Appendix J was prepared by Fehr & Peers.

Comment BW3-4

The comment states that Ballard*King & Associates was directed to use the NGSAs to approximate the number of people who might participate in recreational activities. First, it is important to note that the methodology employed by Ballard*King & Associates was not directed by BCHD or Fehr & Peers. The use of the NGSAs participation statistics is common place for determining the market for recreation activities. NGSAs has more than 35 years of experience providing such data, which can be used to “*to make educated decisions about participants, including market size and composition.*”

Ballard*King & Associates took the national average and combines that with participation percentages of the Primary Service Area based upon age distribution (15.8 percent), median income (16.7 percent), region (17.9 percent), and national number (16.6 percent). As acknowledged in the comment, those percentages were then averaged together to create a unique participation percentage for the Primary Service Area (16.6 percent). This participation percentage, when applied to the population of the Primary Service Area, provided an estimate of the market potential for the proposed Aquatic Center. A Market Capture Rate of 3 percent was applied given the size limitations and operational budget of the facility. This Market Capture Rate was supported by Ballard*King & Associates previous work in the area, work across the country, and the presence of other providers. Similar market feasibility analyses have been prepared for countless sports facilities across California and across the Country.

The complete Aquatics Report, which is publicly available here: <https://bchdcampus.org/sites/default/files/archive-files/Aquatics%20Report.pdf>, thoroughly describes the applicability and use of the NSGA participation statistics in combination with local demographic data. With regard to local data sets requested by the comment, it should be noted that the Aquatics Report includes a robust local survey involving 2,256 responses that focused on the types of aquatic programs respondents were interested. This survey data contributed to and substantiated the use of the NSGA participation statistics and local demographic data.

It should also be noted that Fehr & Peers prepared trip generation estimates by building on the results of the market feasibility study. Fehr & Peers assigned vehicle occupancy factors (e.g., 1 person per vehicle for frequent swimmers as compared to 3 persons per vehicle for occasional swimmers that are likely to include families). Fehr & Peers also considered anticipated programming for the proposed Aquatics Center (e.g., hydrotherapy) to identify shared uses related to the CHF and the proposed Assisted Living program. Together these were used to develop trip generation estimates specific to the proposed Project.

The Vehicle Miles Traveled Study does not hide that these are trip generation estimates. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed via feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. The trip generation estimates for all uses associated with the proposed Project are consistent with ITE recommendations and each of the cities guidelines for preparing transportation studies. This clearly meets the requirement of CEQA Guidelines Section 15003(i), which states

“CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure.”

Therefore, contrary to the assertion of the comment, the trip generation estimates for the developed for the proposed Aquatics Center were appropriate for estimating mobile source GHG emissions associated with the facility.

Letter CP

June 10, 2021
Carl Paquette
5656 Towers Street
Torrance, CA 90503

Comment CP-1

The comment expresses general opposition to the proposed driveway(s) on Flagler Lane. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment CP-2

The comment generally remarks that there are many findings of less than significant impacts, but that these impacts add up. However, the comment does not provide any specific challenge to the thresholds, methodologies, or conclusions of the environmental impact analysis provided in the EIR to further clarify this issue. Project specific impacts and cumulative impacts have been analyzed in great detail within the Environmental Impact Report (EIR) in accordance with the requirements of CEQA. The EIR rigorously adheres to the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

Comment CP-3

The comment expresses general issues related to population growth and traffic associated with employees. However, the comment fails to acknowledge the detailed discussion of these issues in Section 3.12, *Population and Housing* and Section 3.14, *Transportation*. The comment provides

no substantial evidence or expert opinion contesting the thresholds, methodologies, or conclusions of these analyses.

Comment CP-4

The comment asserts, again without substantial evidence or expert opinion, that the height of the proposed height of structures, impacts from shade/shadows, obstruction of wind and coastal breezes, and obstruction of views. The EIR thoroughly assesses the impacts associated with aesthetics and visual resources that could result from construction and operation of the proposed Project in Section 3.1, *Aesthetics and Visual Resources*. As described therein, the analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x for the Phase 1 preliminary site development plan. Additionally, the analysis addresses representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. These photosimulations and representative views were reviewed in the context of CEQA as well as the relevant development standards and sections of the Redondo Beach Municipal Code (RBMC) and the Torrance Municipal Code (TMC). Additionally, shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M). The comment provides no substantial evidence or expert opinion contesting the thresholds, methodologies, or conclusions of these analyses. Similarly, the comment does not provide any supporting information to substantiate the assertion that a single development would disrupt regional offshore and onshore wind patterns.

Letter CR

June 9, 2021
Cecilia Raju

Comment CR-1

The comment expresses general issues regarding the potential impacts on air quality. For example, the comment asserts, without substantial evidence or expert opinion, that given the size and depth of excavation, the potential for soil contaminants is unknown. However, the comment fails to acknowledge the detailed review of this issue in Section 3.8, *Hazards and Hazardous Materials*, supported by the Phase I and Phase II Environmental Site Assessment (ESAs) as well as various follow-up investigations.

The comment notes the requirement for Mitigation Measure (MM) AQ-1 but suggests that the Beach Cities Health District (BCHD) could simply overlook or not follow through with the

mitigation measures. However, as described in Master Response 10 – Air Quality Analysis, the California Environmental Quality Act (CEQA) Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1. In addition, the City of Redondo Beach and the City of Torrance would also monitor and ensure implementation of required mitigation measures with areas under their jurisdiction and authority as well as other regulatory agencies such as the South Coast Air Quality Management District (SCAQMD). Noncompliance with an adopted MMRP could result in a stop work order issued by BCHD construction managers or agencies cited above. Other civil and administrative remedies such as fees, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself. In summary, there are multiple overlapping mechanisms to ensure that mitigation measures are effectively carried out.

In summary issues related to hazardous materials and air emissions are addressed in detail within the EIR and are supported by detailed technical analysis. The comment does not provide any substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of these analyses.

Comment CR-2

The comment expresses general concerns regarding increased noise levels associated with the proposed Project. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction noise. Temporary, but prolonged construction-related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. The comment does not challenge the thresholds, methodology, or the results of the exhaustive quantitative noise modeling provided in the EIR. As described in Impact NOI-1, it should also be noted that Towers Elementary School would not experience significant construction-related noise impacts (refer to Table 3.11-16 and Table 3.11-17).

Comment CR-3

The comment asserts, without substantial evidence or expert opinion, that congestion will result from the implementation of the proposed Project. Section 3.14, *Transportation* clearly addresses and provides a detailed quantification of potential impacts to transportation as a result of construction and operation of the proposed Project.

As discussed in Master Response 13 – Transportation Analysis, increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and potentially slow traffic movement. In addition, frequent haul truck traffic entering and exiting the driveways along North Prospect Avenue and Beryl Street could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, through temporary closure of bicycle lanes or sidewalks. Other potential construction-related impacts include idling, parked, or queued haul trucks that could potentially obstruct visibility. As a result, construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity are identified in this EIR as potentially significant impacts. To avoid construction-related safety hazards, the preparation and implementation of a Construction Traffic and Access Management Plan required under MM T-2 would address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*.

With regard to operational transportation impacts, it should be noted that it should be noted that changes in State law now require that CEQA analysis be based on vehicle miles traveled (VMT) by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing level of service (LOS) by measuring intersection congestion and roadway capacity. This reflects State policy goals to reduce vehicle energy use, particularly energy use associated with non-renewable fossil fuels, and associated greenhouse gas (GHG) emissions and their adverse effects on global climate change. Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and interested residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was

solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

The comment does not provide any substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of these analyses.

Comment CR-4

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter CG

June 10, 2021
Charlene Gilbert

Comment CG-1

The comment states that residences along the Diamond Street cul-de-sac were omitted from the EIR, resulting in failure to mention or analyze impacts of aesthetics and visual resources on these residences. However, the EIR includes detailed consideration and analysis of Project impacts to aesthetics, views, light and glare, and shade/shadow issues in Section 3.1, *Aesthetics and Visual Resources*. See also Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding impacts associated with aesthetics and visual resources.

The comment further states that the EIR’s description of the southeast border does not mention the Diamond Street cul-de-sac and includes photo and written description of a different section of Diamond Street opposite the Project site. The comment also states that the EIR inaccurately describes there being several schools on Diamond Street. However, as demonstrated by the discussion in Section 2.2.2, *Surrounding Land Uses*, and depicted in Figure 2-2, the EIR clearly includes written description of Diamond Street residences located immediately southeast of the Project site. Nevertheless, additional discussion has been added to Section 3.1, Aesthetics and

Visual Resources, to include specific reference to the Diamond Street cul-de-sac. With regard to the EIR's description of schools along Diamond Street, the discussion in the EIR has been revised to correctly reference the Redondo Union High School as being the only school located along Diamond Street.

Comment CG-2

The comment asserts that there is nothing in Section 3.1, *Aesthetics and Visual Resources*, to show the impact on residences of the Diamond Street cul-de-sac. The EIR thoroughly assesses the impacts associated with aesthetics and visual resources that could result from construction and operation of the proposed Project in Section 3.1, *Aesthetics and Visual Resources*. As described therein, the analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x, professional architects and visual simulation specialists, for the Phase 1 preliminary site development plan. The selection of the representative views was based upon those locations from which the Project site – namely the proposed Phase 1 and Phase 2 improvements – would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. Given the proposed Phase 1 development plan would not result in major new development along the southeast portion of the Project site (with the exception of the electrical and gas yard), separate photosimulations depicting the change in views from the Diamond Street cul-de-sac where not included, as views would largely remain the same. Regarding views of the Project site from the Diamond Street cul-de-sac following completion of the Phase 2 development program, the EIR analysis addresses representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. Included in this analysis is a representative view from Diamond Street, just 150 feet southwest of residences of the Diamond Street cul-de-sac. This representative view is used to inform the analysis of Project impacts on views from the Diamond Street cul-de-sac, and inclusion of a new representative view directly from residences of the Diamond Street cul-de-sac is not necessary, nor would it better inform impacts of the Project on aesthetics and visual resources.

See also response to Comment AW-9 for detailed response to request for provision of additional representative views and consultation with the City of Torrance. As described in Comment Response AW-9, CEQA Guidelines Section 15151 states that “[a]n evaluation of environmental effects of a proposed project need not be exhaustive...”. This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide “...a sufficient degree

of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations” (CEQA Guidelines Section 15151).

Comment CG-3

The comment states that the “green buffer” which interrupts views of existing development at the Project site from residences of the Diamond Street cul-de-sac is not discussed in Section 3.1, Aesthetics and Visual Resources. A brief description of this feature has been added to the discussion of views from Diamond Street in Section 3.1.1, *Environmental Setting*.

Comment CG-4

The comment states that representative views do not include views from the Diamond Street cul-de-sac and again states that EIR fails to mention residences directly adjacent to the Project site along the Diamond Street cul-de-sac. Please refer to response to Comments CG-1 and CG-2 above for detailed discussion and response to these concerns.

Comment CG-5

The comment asserts that the EIR fails to define the Diamond Street cul-de-sac as being on the southeastern border of the Project site and lacks consideration of impacts and mitigation of views from these residences. Please refer to response to Comments CG-1 and CG-2 above for detailed discussion and response to these concerns.

Comment CG-6

The comment asserts that the EIR lacks detail regarding the SCE substation yard, its impact on the “green buffer” which consists of existing trees on-site which help to obstruct views of the Project site from residences of the Diamond Street cul-de-sac, and mitigation for restoration of this “green buffer”. Please refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the Project’s impact on aesthetics and visual resources, as well as plans for replanting of the “green buffer.”

Comment CG-7

The comment expresses concern regarding potential adverse health effects from the proposed substation on the residences of the Diamond Street cul-de-sac. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electric Yard for detailed discussion and response to concerns regarding the SCE substation and electrical yard.

Comment CG-8

The comment asserts that the EIR does not address or offer mitigation of noise impacts resulting from the loss of trees along the Project's southeastern boundary within the "green buffer", nor does it include consideration of impacts from the proposed SCE substation yard. Please refer to Master Response 12 – Credibility/Sufficiency of Noise Analysis for detailed discussion and response to concerns regarding the EIR's analysis of noise impacts, including consideration of noise generated by the SCE substation yard.

Comment CG-9

The comment asserts that impacts resulting from light pollution generated by the proposed Project on residents of the Diamond Street cul-de-sac are not properly addressed. Please refer to response to Comment CG-1 above.

Comment CG-10

The comment incorrectly asserts the EIR does not account for existing hazardous material on site, soil contamination from the former dry cleaners, or acknowledge runoff or construction-related fugitive dust emissions. Polluted stormwater runoff is discussed in Section 3.9, Hydrology and Water Quality. As described in Section 3.8, Hazards and Hazardous Materials and summarized in BCHD Master Response 11 - Hazards and Hazardous Materials Analysis, the prepared Phase I ESA identified potential sources of contamination including the former dry cleaner located within the Redondo Village Shopping Center. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of these ESAs, the EIR describes compliance with applicable regulations and standards, best management practices, and mitigation measures to address these conditions and ensure Project impacts would be less than significant. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for further detailed discussion and response to these concerns.

As described in Section 3.2, *Air Quality* and summarized in Master Comment Response 10 – Air Quality Analysis, the analysis of construction of the proposed Project considers the impacts of fugitive dust (i.e., PM₁₀) emissions. Section 3.2.4, Projects Impacts and Mitigation Measures under Impact AQ-2, the EIR describes mitigation measures that would reduce fugitive dust emissions to less than significant. Refer to Master Response 10 – Air Quality Analysis for further detail.

Comment CG-11

The comment reiterates concerns in the above Comment CG-10 regarding analysis of impacts to biological resources from potential toxic waters and mud runoff. Please refer to response to

Comment CG-10 above for detailed discussion and response to these concerns. As it relates to biological resources, those sections referenced in the above response address impacts and mitigation relevant to each of these issues and which would by effect, address potential impacts to downstream biological resources.

Comment CG-12

The comment again asserts that the residences located in the Diamond Street cul-de-sac area were not defined as being on the southeast border of the Project site not included in the EIR, and the analysis of impacts on these residences is incomplete. Please refer to responses to Comments CG-1 through CG-11 above for detailed discussion and response to stated concerns regarding consideration and analysis of impacts on the Diamond Street cul-de-sac residences.

Letter CI

June 6, 2021
Chiaki Imai

Comment CI-1

The comment expresses general opposition to the proposed Project and citing construction noise impacts on nearby sensitive receptors. It should be clarified that while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to concerns regarding the temporary, but prolonged construction noise impacts on nearby sensitive receptors. The comment does not provide any substantial evidence or expert opinion regarding excessive stress. However, it should also be noted that while other commenters have provided articles, studies, and literature reviews (e.g., refer to the responses to Letter TRAO, FL1, and FL2) they generally show no clear connection to the proposed Project or the environmental impact analysis in the EIR.

Comment CI-2

The comment claims that contaminated air and dust will enter the homes of nearby residents. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments potential air quality impacts on sensitive receptors. The comment provides no substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of the exhaustive air emissions modeling prepared by iLanco, a firm with decades of experience

quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

Comment CI-3

The comment expresses concerns, without substantial evidence or expert opinion, regarding construction-related traffic safety impacts on the surrounding roadways. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to concerns regarding construction-related traffic impacts and safety.

Comment CI-4

The comment states that the building is huge and does not fit within the neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding potential impacts on aesthetics and visual resources. The comment provides no substantial evidence or expert opinion that challenges the impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*, which is supported by photographs, computer-generated photosimulations, and a shade and shadow analysis.

Comment CI-5

The comment expresses general opposition to the proposed Project, claiming that it would only benefit those who can afford the cost of the Assisted Living program or Memory Care Community. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care for detailed discussion and response to comments regarding the affordability of senior care facilities. While not relevant to the adequacy of the EIR, it should be noted that BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services.

Letter CK

Chikako Kashino
509 Cluster Lane
Redondo Beach, CA 90278

Comment CK-1

The comment expresses general opposition to the proposed Project, citing construction-related noise impacts as well as perceived construction-related pollution and traffic impacts. Each of these issues is addressed in detail in the Environmental Impact Report (EIR) within Section 3.11, *Noise* as well as Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, and Section 3.14, *Transportation*. The comment provides no substantial evidence or expert opinion that challenges these impact analyses.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter CKS

Chris and Kristy Sullivan
5013 Deelane St.
Torrance, 90503

Comment CKS-1

The comment notes that there are 11 schools within 0.5 miles of the Project site. The comment goes on to state that these schools as well as nearby residents in the City of Torrance are particularly susceptible to construction-related air quality impacts. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments pertaining to air quality impacts and the potential effects on nearby sensitive receptors. The comment provides no substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of the exhaustive air emissions modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

The comment also asserts that asbestos and other hazardous building materials could affect nearby sensitive receptors. However, the comment fails to acknowledge that this issue is addressed in detail in Section 3.8, *Hazards and Hazardous Materials*. as required by Mitigation Measure (MM)

HAZ-1, surveys for asbestos-containing materials (ACM), lead-based paint (LBP), and polychlorinated biphenyls (PCBs), and molds would be conducted by a licensed consultant(s) prior to and during the demolition activities. If such hazardous materials are found to be present, the licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and mold to ensure public safety, such as sealing off an area with plastic and filtering the affected air to ensure that no asbestos fibers are let out into the surrounding environment. Therefore, implementation of mitigation measure MM HAZ-1 and compliance with existing mandatory regulations and abatement procedures for the treatment, handling, and disposal of ACM, LBP, PCBs and mold, would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby schools and residences.

Comment CKS-2

The comment expresses concern regarding construction-related noise impacts on nearby schools and the indoor learning environment. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding impacts from noise. First, it is important to note that while the Environmental Impact Report (EIR) finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east, exterior noise levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Therefore, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the BCHD campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA.

Comment CKS-3

The comment expresses concern regarding potential impacts on transportation and traffic, noting existing back-ups particularly during school dismissal and peak hour periods. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to comments regarding potential construction-related and operational transportation. The comment provides no substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions in the transportation studies prepared by Fehr & Peers a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay.

Comment CKS-4

The comment expresses general opposition to the proposed Project, asserting the commenter’s opinion that the massive building does not fit in with the community that it surrounds.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter CT

April 22, 2021
Chris Tuxford

Comment CT-1

The comment expresses general opposition to the Project, asserting that there is a lack of need for the proposed Project. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the need for the proposed Project.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter CO

May 26, 2021
Colleen Ota

Comment CO-1

The comment expresses general support for the proposed Project, but recommends that the height of the proposed buildings be limited to 4 stories. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

It should be noted that the proposed development has been sized to provide adequate square footage to support the proposed uses and to meet the project objectives related to revenue generation. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. Nevertheless, as described in Redondo Beach Municipal Code (RBMC) Section 10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district are subject to Planning Commission Design Review. The comment cites RBMC Section 10-2.2502, which guides the Planning Commission Design Review. As described in Section 3.1, *Aesthetics and Visual Resources* and Section 3.10, *Land Use and Planning*, the Planning Commission Design Review could further revise the proposed Project (e.g., limit FAR, building height, setbacks, etc.); however, the EIR appropriately defines and analyzes the maximum disturbance envelope pursuant to the requirements of California Environmental Quality Act (CEQA).

Letter CC

March 10, 2021
Dr. Conna Condon

Comment CC-1

The comment expresses general opposition to the proposed Project asserting that the proposed Assisted Living units would not be affordable and that the Environmental Impact Report (EIR) underestimates traffic. However, the comment does not provide any substantial evidence or expert opinion to substantiate these assertions. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a response to comments pertaining to the affordability

of the proposed Assisted Living units. Additionally, refer to Master Response 13 – Transportation Analysis for a detailed discussion regarding the transportation analysis provided in Section 3.14, *Transportation*, supported by studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay.

Comment CC-2

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter DR

April 28, 2021
Dan Rogers

Comment DR-1

The comment asserts that the proposed Project would severely impact traffic and congestion. Refer to Master Response 13 – Transportation Analysis for a detailed discussion regarding the transportation analysis provided in Section 3.14, *Transportation*, supported by studies prepared by Fehr & Peers. The comment provides no substantial evidence or expert opinion challenging the thresholds, methodology, and findings of these studies.

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter DG

June 8, 2021
Dana Grollman

Comment DG-1

The comment asserts, without substantial evidence or expert opinion, that the scope and height of proposed buildings would dramatically change the views for residents in the area and affect their

resale value. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding potential impacts on public views. With regard to comments property and/or resale values, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis “...*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “*significant effect on the environment*” as “*a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.*” Accordingly, the EIR analyzes the potentially significant adverse physical effects of the proposed Project (CEQA Guidelines Section 15358[b]). The purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this Environmental Impact Report (EIR) as required by CEQA.

Comment DG-2

The comment expresses general concerns regarding the proposed Phase 2 parking structure including how it would look and the traffic impacts it would cause. The comment does not provide any substantial evidence to further clarify these concerns. Each of these issues is addressed in detail within the EIR. For instance, the analysis of aesthetics and visual resources impacts in Section 3.1, *Aesthetics and Visual Resources*, provides visual renderings for three separate Phase 2 example site plan scenarios for illustrative purposes and to help inform the program analysis. Additionally, as discussed in the response to FL1-12, while no longer a CEQA issue pursuant to Senate Bill (SB) 743 and CEQA Guidelines 15064.3, the construction of the proposed parking structure in Phase 2 would not result in substantial increases in volume-to-capacity (V/C) ratios or vehicle delays at any of the three existing driveways along North Prospect Avenue or the intersection of North Prospect Avenue & Diamond Street (refer to Appendix M). This is because vehicles would travel to and from the Project site throughout the day and would not be concentrated around the peak hours. In fact, even with the implementation of Phase 2, there would still be a minor reduction in AM and PM peak hour vehicle trips. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to trip generation associated with the proposed Project.

Comment DG-3

The comment expresses general concern regarding construction-related impacts on traffic at the corner of Flagler Lane & Beryl Street, particularly when school is in session. Refer to Master Response 13 – Transportation Analysis as well as the response to Comment KB-3, which provide

a detailed discussion related to construction-related traffic. The comment provides no substantial evidence or expert opinion challenging the analysis of construction-related traffic provided in Section 3.14, *Transportation* under Impact T-3.

Comment DG-4

The comment expresses general concern regarding construction-related noise impacts. This issue is addressed in detail with Section 3.11, *Noise*, with analysis supported by detailed quantitative noise modeling. Temporary, but prolonged construction-related noise impacts are identified for sensitive receptors located on-site and immediately adjacent to the Project site. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding noise impacts. The comment provides no substantial evidence or expert opinion that challenges the thresholds, methodology, or results of the exhaustive quantitative noise modeling effort.

Comment DG-5

The comment expresses general concern regarding soil contamination. As described in Master Response 11 – Hazards and Hazardous Materials Analysis, this issue is address in detail in Section 3.8, *Hazards and Hazardous Materials*, with analysis supported by the Phase I and Phase II Environmental Site Assessment (ESAs) and additional follow-up investigations. This comment provides no substantial evidence or expert opinion challenging this analysis or the required mitigation measures to reduce associated risks to a less than significant level.

Comment DG-6

The comment expresses general concern regarding the perception that BCHD is gifting a lease to an Assisted Living program to be operated by a third party for residents located outside of the Beach Cities. It should be noted that the proposed Project would not gift public land to private developers, rather the BCHD would use revenues generated from the proposed Project to re-invest in and continue community health and wellness programming and services in alignment with the mission of BCHD. As described in Section 2.3, *Existing Tenants* BCHD currently uses a similar revenue generation model providing leased space for a variety of mission-oriented tenants. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The market study prepared by MDS Research Company, Inc. identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area.

Comment DG-7

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter DF

June 10, 2021
Dean Francois

Comment DF-1

The comment provides a general overview of numerous issues discussed further in Comments DF-2 through DF-6.

The comment expresses general concerns regarding the analysis of air quality, energy, biological resources, and greenhouse gas (GHG) emissions, without providing any specific details regarding how or why the Environmental Impact Report (EIR) does not adequately discuss or characterize impacts related to these resources. Contrary to the assertions in this comment, the EIR rigorously adheres to the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151.

The comment asserts that the EIR failed to adequately consider alternatives to retrofit the existing building. However, it should be noted Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space* does explore a seismic retrofit – funded by a local bond measure. Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. The Beach Cities Health District (BCHD) would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

The comment asserts that typically public input on an EIR is provided to a public agency. The comment claims that it is a highly unusual relationship for BCHD to certify its own EIR. However, contrary to this comment, local jurisdictions regularly certify EIRs for their own capital improvement projects and long-range plans. For example, cities and counties are responsible for preparing CEQA-compliant documentation for their own general plans, specific plans, etc. Nearly all cities and counties within the State are currently preparing CEQA-compliant documentation, as lead agencies, for updates to their Housing Elements. For additional detailed discussion and a response to comments pertaining to BCHD's role as the lead agency, refer to Master Response 2 – BCHD as Lead Agency.

The comment asserts that BCHD has strayed far beyond its mission and claims that the proposed Project is a gift of public lands. It should be noted that the proposed Project would not gift public land to private developers, rather the BCHD would use revenues generated from the proposed Project to re-invest in and continue community health and wellness programming and services in alignment with the mission of BCHD. As described in Section 2.3, *Existing Tenants*, BCHD currently uses a similar revenue generation model providing leased space for a variety of mission-oriented tenants.

Comment DF-2

The comment states that the main purpose of the proposed Healthy Living Campus Master Plan is to generate revenue so that BCHD can fund community health and wellness programs and services, but that proposed Project may conflict with this purpose given the proposed public/private partnerships. However, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would continue this model. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community. The comment asserts that there are additional alternatives that could generate additional revenue, but does not provide any specific details regarding such an alternative.

Comment DF-3

The comment asserts that the EIR is faulty because it provides no financial information regarding the escalating maintenance costs. The comment claims that the EIR has incorrectly eliminated the interior renovation of the Beach Cities Health Center as an alternative due to financial infeasibility. CEQA Guidelines states that an EIR should provide a description of the project, including a “*general description of the project’s technical, economic, and environmental characteristics,*” the

lead agency is not required to do so if the information “...*does not supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis* describes that the interior upgrade of the Beach Cities Health District would address existing maintenance issues (e.g., outdated electrical and plumbing systems) and would provide space configurations that would be better suited for potential tenants. However, the upgrade would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. Upgrades to water lines, electrical lines, and natural gas lines as well as relocation of interior walls and refinishing would all require substantial interior construction work. Not only would this alternative not meet the project objectives to proactively address seismic safety issues and to provide additional open space, but the financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. This issue has been discussed at length as a part of the need for the proposed Project at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings.

Comment DF-4

The comment restates the assertion that the proposed Project would conflict with the project objective of generating sufficient revenue to address community health needs. The comment claims that the project objectives are too restrictive and limit the ability to select better alternatives that meet the mission of BCHD. Refer to the response to Comment DF-2 for detailed discussion and response to these concerns.

Comment DF-5

The comment asserts that the EIR is faulty because the Upgrade to Beach Cities Health Center (No Seismic Retrofit) Alternative was considered and discarded from further analysis. The comment claims that the analysis of rental income is lacking and that the BCHD would have little to no control to achieve the stated project objective of generating revenue to provide community health and wellness programs and services. With regard to analysis of rental income and ability for BCHD to achieve Project objectives, refer to the response to Comment DF-3 as well as Master Comment 6 – Financial Feasibility/Assurances.

As discussed in Section 5.4, *Alternatives Considered but Rejected from Further Analysis* the Beach Cities Health Center would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. The financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. Therefore, this alternative would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD, and was discarded from further consideration. It should also be noted that this alternative would not address potential seismic safety issues or provide open space within the campus. This discussion provides sufficient information and explanation as to why this alternative would not generate enough financial resources necessary to meet the basic objectives of the Project. CEQA Guidelines Section 15126.6(c) states that

“The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

Comment DF-6

The comment asserts that the EIR fails to analyze an accurate No Project Alternative, which considers leaving the buildings intact, and incorrectly justifies that demolition of existing structures would have to occur since buildings would deteriorate or fail to meet seismic specifications. This issue is also addressed in the response to Comment TRAO-86. For context, pursuant to CEQA Guidelines Section 15126.6(e)(1), “[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Pursuant to CEQA Guidelines Section 15126.6(e)(2), “[t]he ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur

in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing BCHD campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is “*reasonably expected to occur in the foreseeable future*” clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District and substantially reducing public health service available to Beach Cities residents and even those of the South Bay. Additionally, these demolition activities

may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed.

Comment DF-7

The comment asserts that a complete analysis should be performed for both a remodel alternative as well as a remodel and retrofit alternative. However, as discussed in the responses to Comment DF-2 through DF-6, the EIR need not be revised to carry forward a remodel alternative given that it would not meet the basic project objectives. Additionally, the No Project Alternative sufficiently describes what is reasonably expected to occur in the foreseeable future consistent with the requirements of CEQA Guidelines Section 15126.6(e).

Letter DV

June 10, 2021
Delia Vechi

Comment DV-1

The comment states that the Environmental Impact Report (EIR) should disclose any conflict of interest that individuals may have between the Beach Cities Health District (BCHD) and Wood Environment & Infrastructure Solutions, Inc. (Wood) and its subconsultants. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in California Environmental Quality Act (CEQA) Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Comment DV-2

The comment provides support for other comments opposing the EIR and/or the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment DV-3

The comment states that the EIR has ignored the fact that the existing buildings can be retrofitted. As described in Master Response 3 – Project Need and Benefit, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the *Beach Cities Health District Seismic Assessment* and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). These buildings were designed and constructed in conformance with building code requirements at the time of construction; however, the building code requirements have since evolved substantially based on research, best practices, and experience from previous earthquakes. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

The EIR acknowledges that the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD’s mission (refer to Section 2.4.2, *Project Background*). Revenues from the long-term tenant leases support BCHD community health programs and services, such as the Community Services program, the Center for Health and Fitness (CHF), and the Beach Cities Partnership for Youth. However, BCHD’s ability to attract tenants has diminished in recent years, in part because of the specialized nature of the former South Bay Hospital Building, which cannot be easily renovated to conform to tenant needs. Therefore, even if simply seismically retrofitting the Beach Cities Health Center were financially feasible, it would not address these additional issues associated with providing purpose-built facilities for outpatient medical services and other community health and wellness needs. Additionally, because of its age, the Beach Cities Health Center is a source of rapidly escalating building maintenance costs, independent of and in addition to the cost necessary to address its seismic-related structural deficiencies. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and

renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible.

Comment DV-4

The comment states that the justification for the proposed Project is to avoid bankruptcy. Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to the need for the proposed Project. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD’s mission. Revenues from the long-term tenant leases support BCHD community health and wellness services for both residents of the Beach Cities living and many interested residents from the South Bay. As such, the proposed development must replace revenue to support the current level of existing community health and wellness programs and services as well as generate new revenues to fund the growing future community needs.

Comment DV-5

The comment asserts that the underlying purpose of the proposed Project is to develop the proposed Residential Care for the Elderly (RCFE) Building, despite purported conflicts for such with existing site zoning designations. The comment also claims that the proposed Programmatic All-Inclusive Care for the Elderly (PACE) should not be included as part of the Project because the Beach Cities are already served by the LA Coast PACE. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to concerns pertaining to the need for each element of the proposed Project. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a response to comments pertaining to land use compatibility associated with the proposed Assisted Living program and Memory Care community. As described therein, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted on P-CF zones with a conditional use permit (CUP). Additionally, contrary to the assertion of the comment, the National PACE Association website shows that there are three PACE programs within the City of Los Angeles as well as one in the City of Long Beach; however, there are currently no PACE programs located within any of the three Beach Cities or the South Bay. Therefore, the proposed Project would fulfill a regional need for PACE program services that would permit seniors to safely remain in their own homes while receiving support to do so.

Comment DV-6

The comment states that the proposed Phase 2 development program must be included as the first phase of the proposed Project as it more fully aligns with BCHD’s mission, but the Phase 2 development program is less defined and not clear when or if the program will be built. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion and response to concerns regarding certainty of the Phase 2 development program. As described in Section 2.0, *Project Description*, the Phase 2 development program would be implemented at least 5 years after the development under Phase 1 and the programming in Phase 2 and the associated development is intended to respond to the Community Health Report and priority-based budgeting efforts to meet constantly evolving community health and wellness needs in the Beach Cities and the nearby South Bay communities. As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan. This approach is often used by lead agencies – including local municipalities – when evaluating the impacts of long-term plans or programs, where more information may be developed for earlier planned improvements, and less detailed design plans existing for later improvements.

Comment DV-7

The comment asserts that the proposed RCFE Building is not consistent with the P-CF (Community Facility) zoning of the existing BCHD campus. Refer to the response to Comment DV-5 as well as Master Response 7 – Project Compatibility with P-CF Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

Comment DV-8

The comment correctly states that the vacant Flagler Lot is zoned as C-2 (Commercial) and that a portion of the Project site is located within City of Torrance right-of-way. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way, which are relatively minor components of the proposed Project, would require permits issued by the City of Torrance. However, the City of Torrance’s jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the BCHD campus beyond the municipal boundaries.

The comment states that the vacant Flagler Lot was previously used for oil and gas activities, with petroleum pumps working on-site for year. The comment claims that BCHD has not disclosed

whether the condition of the soil or otherwise described who would take responsibility if something is wrong with the existing wells. As described in Master Response 11 – Hazards and Hazardous Materials Analysis, issues related to the previously plugged and abandoned oil and gas well are addressed in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-2. As described therein, Total Petroleum Hydrocarbons (TPH) in the heavy oil range were detected in two samples at boring locations within the vacant Flagler Lot. These concentrations are most likely related to the previously plugged and abandoned oil and gas well; however, they are well below the Department of Toxic Substances Control (DTSC) and U.S. Environmental Protection Agency (USEPA) residential screening level and do not represent a potential hazard to the environment or public health. Terra-Petra Environmental Engineering (Terra-Petra) excavated the well to physically locate it and complete a leak test, which was negative (i.e., no leaks were detected). Terra-Petra has prepared a summary report, which has since been shared with California Geologic Energy Management Division (CalGEM), the responsible oversight agency. Pursuant to Mitigation Measure (MM) HAZ-3, BCHD has enrolled into the CalGEM Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM’s Well Review Program and compliance with CalGEM’s advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

Comment DV-9

The comment asserts that the EIR does not fully address hazards generated by the former dry cleaner within the Redondo Village Shopping Center directly north of the Project site. Refer to Master Response 8 – Hazards and Hazardous Materials Analysis for detailed discussion and response to comments pertaining to the potential impacts associated with tetrachloroethylene (PCE). The comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to

Section 3.8, *Hazards and Hazardous Materials*). With the implementation of the mitigation measures identified in the EIR (i.e., MM HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant. Implementation of these measures would ensure appropriate handling of soils on-site.

As described in Section 3.8.1, *Environmental Setting*, BCHD has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered PCE contamination and is working with these the agencies and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the Certified Unified Program Agency (CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup. Although previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the BCHD campus have not experienced vapor intrusion from subsurface contamination, development would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatilized PCE through carbon filters before outgassing the vapor at a controlled rate. Because PCE is generally only hazardous when encountered in a confined space, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

Comment DV-10

The comment asserts that the RCFE does not belong on the BCHD due to its purported incompatibility with the P-CF zoning designation and its purported conflict with BCHD's mission. The comment further asserts that the EIR does not address complaints regarding increased

ambulance noise that will result from implementation of the RCFE. Refer to the response to Comment DV-5 as well as Master Response 7 – Project Compatibility with P-CF Land-Use Designation for detailed discussion and response to comments pertaining to this issue. Additionally, refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments regarding the need for the proposed Project, including the Assisted Living program, Memory Care community, PACE, and other community health and wellness facilities, programs, and services.

With regard to the analysis of impacts from operational ambulance noise, refer to Master Response 12 – Noise Analysis. The noise analysis presented in the EIR includes detailed discussion and analysis of impacts associated with operation of the proposed Project. Despite the commenter’s assertions, this analysis does in fact include a detailed analysis of emergency vehicle noises. For instance, the analysis considers the potential increase in total number of individuals requiring ambulance services and the associated number of ambulance calls associated with this number based on average annual calls per bed space per year. While it is noted that these responses would be sporadic and not always require the use of sirens, as a majority of these calls are related to medical situations that do not always require an emergency responses, the analysis includes discussion of the typical noise impacts that increased medical response would generate when sirens are utilized (approximately 100 dBA at 100 feet, and between 91 and 100 dBA at receptors along North Prospect Avenue and Beryl Street). In such a case, associated noise impacts are not considered significant given the infrequent and short duration of siren utilization (duration of exposure to peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic).

Comment DV-11

The comment questions the need for the proposed RCFE Building and suggests that new approach include decentralized, which use the outdoor environment and smaller decentralized spaces. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the need for the proposed Project. The matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, this need for the proposed Project has been discussed in detail at numerous well-noticed public hearings. It should also be noted that the proposed Project includes PACE services allowing participants to remain in their homes in the community. Additionally, the proposed Project includes 2.45 acres of programmable open space that would be accessible to the public and also available for use by the proposed Assisted Living facility, PACE services, etc.

Letter DH1

June 10, 2021
Diane Hayashi

Comment DH1-1

The comment asserts, without substantial evidence, that the proposed Residential Care for the Elderly (RCFE) Building would be incompatible with surrounding neighborhoods, citing the size and placement of the building near the perimeter of the Project site. The comment also asserts that the proposed RCFE Building would be incompatible with Redondo Beach and Torrance general plan policies and municipal codes. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding potential impacts associated with aesthetics and visual resources, including height and size of the proposed RCFE Building, access to skyline views, compatibility with the surrounding neighborhood, shade and shadow effects, and privacy concerns. The impact analysis included in Section 3.1, *Aesthetics and Visual Resources* is informed by photosimulations prepared by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, as well as renderings of the development under Phase 2 and a detailed shade and shadow analysis. The comment does not challenge any specific aspect of the policy consistency analysis described under Impact VIS-2. As such, the assertion that the proposed Project was permanently ruin the surrounding neighborhood and the South Bay is wholly unsupported.

Comment DH1-2

The comment requests that the EIR address violations with City of Torrance General Plan Policy LU.2.1 and Policy LU.3.1, and City of Redondo Beach General Plan Policy 1.46.4. However, the comment does not provide any further detail regarding how or why the proposed Project violates these policies. Consistency with applicable policies of the City of Redondo Beach and City of Torrance General Plans is presented and analyzed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5. As presented therein, the proposed Project would not present any conflict with either of these three policies. Specific issues related to Redondo Beach General Plan Policy 1.46.4 as well as Torrance General Plan Policy LU.2.1 and LU.3.1 are also addressed in the response to Comment TRAO-19 and Comment AN6-2.

Letter DH2

June 10, 2021
Diane Hayashi

Comment DH2-1

The comment asserts that the analysis of operational noise levels for anticipated events on-site was not sufficiently discussed or analyzed in the Environmental Impact Report (EIR). However, the comment does not provide any substantial evidence or expert opinion describing how or why the analysis of operational noise levels provided under Impact NOI-3 is deficient.

The comment further states, again without any substantial evidence or expert opinion, that the analysis of noise is deficient due to the use of modeled average noise and not intermittent noise. Refer to Master Response 12 –Noise Analysis for detailed discussion and response to comments pertaining to construction and operational noise impacts. This response to comments provides a detailed explanation of the Federal Transit Authority (FTA) thresholds as well as the noise metrics that were used in the impact analysis. This issue is also addressed in the response to Comment AW-30.

The comment incorrectly asserts that the effects of noise disruptions as well as ground vibrations were never studied. Potential impacts associated with ground-borne vibration were clearly described under Impact NOI-2. The comment does not challenge any specific thresholds, methodologies, or conclusions of this impact analysis, which is supported by extensive quantitative modeling.

The comment claims that viable noise mitigation was not considered, such as setback of the structure and a reduction in building heights. However, the comment fails to acknowledge the site planning constraints associated with the existing Beach Cities Health Center. Additionally, the requested reduction in height to 30 feet would not provide sufficient space within the RCFE Building or the other structures proposed under the Phase 2 development program to meet the project objectives. Refer to Master Response 12 –Noise Analysis for additional detailed discussion and response to comments pertaining to construction related noise issues and mitigation measures. This issue is also addressed in the response to Comment AW-15 and AW-31.

Letter EA

June 10, 2021

Ed Arn

Comment EA-1

The comment states that there are many inconsistencies between the text, summary tables, and graphics in the Environmental Impact Report (EIR). However, the comment fails to provide further details describing in what way the EIR is inconsistent.

Comment EA-2

The comment highlights several issue areas identified during the scoping process that are of interest to the commenter and are discussed in the EIR, but asserts that several other issues were ignored. In particular, the commenter asserts that the discussion of hazards and noise impacts resulting from construction truck traffic along the Beryl Street outbound haul route could not be located in the EIR.

The EIR provides a detailed discussion of issues identified by the public during the scoping process, including aesthetics and visual resources, air quality, hazards and hazardous materials, noise, and traffic from both construction and operation of proposed improvements in Sections 3.1, *Aesthetics and Visual Resources*, 3.2, *Air Quality*, 3.8, *Hazards and Hazardous Materials*, 3.11, *Noise*, and 3.14, *Transportation*, respectively. The analyses presented therein consider and analyze potential impacts associated with construction truck traffic along proposed haul routes. To avoid construction-related safety hazards, implementation of Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety.

Comment EA-3

The comment asserts that BCHD's response to public criticism regarding the potential impacts on aesthetics and visual resources resulting from the 2019 Master Plan and the height of structures proposed therein has been completely ignored in the revised Healthy Living Campus Master Plan. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue. As discussed therein, community feedback received from such outreach efforts has helped guide revisions to the conceptual plans for the proposed Healthy Living Campus Master Plan, which was originally released to the public in June 2017. The original site plan included a 6-level parking structure on the vacant Flagler Lot, a 7-story assisted living building, and a 4-story independent living building over 3 levels of parking.

Community feedback was received on issues relating to building height, density of development, and the proximity of the proposed development to adjacent single- and multi-family residential land uses. To address these concerns, the 2019 Master Plan refined the original conceptual plan by removing the proposed parking structure from the vacant Flagler Lot, relocation of the parking to the southeast corner of the BCHD campus, and reducing the height of the RCFE Building to 4 stories by wrapping the building footprint along the eastern boundary of the campus. BCHD further revised the footprint of the RCFE Building to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 sf to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

Comment EA-4

The comment expresses concern regarding the EIR analysis of impacts on aesthetics and visual resources, citing specific concerns regarding height of proposed structures, loss of views and ocean breezes, and impacts from shade/shadows cast onto surrounding private residences. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the EIR’s analysis of impacts on aesthetics and visual resources, which is supported by photographs, computer-generated photosimulations, and a shade and shadow analysis. As suggested by the comment, numerous site visits were made to collect data, including a wide variety of photographs from areas located on the Project site, adjacent to the Project site, and at further distances.

First, the comment conflates impacts to scenic views and impacts to the visual character of the Project site. The EIR does not make any findings to neighbor character based on long-range views from the intersection of Flagler Lane & 190th Street. Impacts to neighborhood character are addressed under Impact VIS-2. These findings are substantiated by photosimulations from five different locations located immediately adjacent to or in close proximity to the campus (refer to

Figure 3.1-1) as well as a policy consistency analysis (refer to Table 3.1-2). As described for Representative View 2, Representative View 3, and Representative View 4, would noticeably alter the existing views of the Project site from these locations and would reduce blue sky views as the comment suggests; however, the development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from these locations. In fact, the proposed Project includes many attributes that would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the BCHD campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm.

Comment EA-5

The comment asserts that the EIR is misleading and incorrect in its description of views from Tomlee Avenue. Representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represent views of the Project site from the residential neighborhood within Torrance adjacent to the east of the Project site. This view includes foreground views of the street, mid-ground view of the east-facing single-family residences along Tomlee Avenue, and background views of large, landscaped trees as well as the upper levels of the Beach Cities Health Center and the open sky above. As discussed under Impact VIS-2, the proposed RCFE Building would rise up to 103 feet above the existing campus ground level and 133.5 feet above the vacant Flagler Lot. Views of the proposed RCFE Building from Tomlee Avenue would be partially screened by mature landscaped trees surrounding the single-family residences as well as along the eastern perimeter of the Project site. While the top two stories of the RCFE Building and the rooftop cooling tower would be visible from this location and would obscure a portion of the open sky above, views of the Project site would not change substantially from this location largely in part due to intervening rooflines and taller trees that would obstruct the RCFE Building. This finding is supported by the photosimulations provided by VIZf/x, which

show that development at the Project site would transition from the south of the site to the north, and would not result in a substantial increase in perceived height of the proposed structure compared to existing development.

Comment EA-6

The comment states that the EIR's discussion of the existing visual character of the Project site's surroundings cite the existence of 4-story multi-family residential buildings between Beryl Street and Agate Street, but the commenter was unable to locate the referenced 4-story structures. However, the EIR discussion references the development on the northwest corner of the Beryl Street and Flagler Lane intersection, which is in fact a 4-story multi-family residential building. Nevertheless, the discussion of the existing visual character of the Project site in Section 3.1.1, *Environmental Setting*, has been revised to specifically cite reference to this structure, as opposed to general reference to several structures of similar height being located within this area between Beryl Street and Agate Street.

Comment EA-7

The comments correctly notes and references local policies provided in the Land Use Elements of the City of Redondo Beach and City of Torrance General Plans that include provisions to assure developments are visually and functionally compatible with existing surrounding development. The comment fails to acknowledge or otherwise challenge the detailed discussion and policy consistency analysis presented in Tables 3.10-3 and 3.10-5. As described therein, the proposed Project would not present any conflict with the policies referenced by the commenter.

Comment EA-8

The comment notes the responsiveness to scoping comments on the need for air quality mitigation measures; however, the comment expresses concern that proposed Mitigation Measure (MM) AQ-1 may not be enough to prevent large amounts of fugitive dust from escaping the Project site and watering of exposed soils three times a day may be too little. The comment recommends an additional measure to include a small portable enclosure to be placed over the exposed area and pulverized concrete to trap dust. MM AQ-1 base on best practices employed by agencies and proven successful in reducing or preventing fugitive dust from construction of new development, including demolition of existing structures and concrete materials. In addition to these measures, as discussed under Impact AQ-2, the proposed Project would also be subject to existing regulations and requirements of the SCAQMD, including SCAQMD Rule 403 which requires the implementation of best available dust control measures during active operations capable of generating fugitive dust. Based on the proposed mitigation measure and requirements of existing

regulations, no additional mitigation is considered necessary to reduce potential impacts of the Project related to construction-related fugitive dust emissions. This is supported by extensive air quality modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to Master Response 10 – Air Quality Analysis for additional detailed discussion and a response to comments pertaining to this issue.

Comment EA-9

The comment states that the planned outbound haul route on Beryl Street would take thousands of trucks past the entrance to Towers Elementary School and may represent a hazard that requires mitigation, but the commenter was unable to locate this discussion in the EIR. The analysis of Project impacts resulting from construction traffic on local roadways is discussed in Section 3.14, *Transportation*. As discussed therein, construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the Project vicinity would be potentially significant. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street.

However, in addition to the identified mitigation, due to requests from the City of Torrance and the Torrance Unified School District (TUSD) for revisions to the construction haul routes proposed in the Draft EIR, the following construction haul routes have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to schools:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from the vacant Flagler Lot by traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards Interstate (I-) 405.
- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesia Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.

- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

These proposed inbound and outbound construction haul routes for the proposed Project have been revised in the Final EIR in response to these requests from the City of Torrance and TUSD. It should also be noted that TUSD has acknowledged that this revision would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Letter EN

March 24, 2021
Elisa Nye
North Juanita Avenue

Comment EN-1

The comment expresses general concern regarding potential impacts on traffic and congestion, asserting, without substantial evidence or expert opinion, that getting in and out of the neighborhood near the Beach Cities Health District (BCHD) campus would become very difficult during construction and operation of the Project. First, it should be noted that pursuant to Senate Bill (SB) 743 and California Environmental Quality Act (CEQA) Guidelines Section 15064.3, vehicle miles travel (VMT) has replaced roadway capacity-based or automobile delay-based level of service (LOS), as the metric for transportation impact analysis (refer to Section 3.14, *Transportation*). Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and interested residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

The comment does not provide any substantial evidence or expert opinion that challenges any of the thresholds, methodologies, or conclusions of these analyses.

Comment EN-2

The comment expresses concern that the proposed Project would displace many family doctors that are currently located at the BCHD campus, making it difficult for residents of the Beach Cities to access regular health care. As described in Section 2.0, *Project Description*, space on the existing BCHD campus is leased to a variety of tenants and private medical practitioners within the Beach Cities Advanced Imaging Building (510 North Prospect Avenue), Beach Cities Health Center (514 North Prospect Avenue), and the Providence Little Company of Mary Medical Institution Building (520 North Prospect Avenue). Under Phase 1 of the proposed Project, the existing Beach Cities Advanced Imaging Building (510 North Prospect Avenue), associated parking structure (512 North Prospect Avenue), Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) and associated surface parking lot and subterranean parking garage would remain in place on the campus, and no interruption in services provided by these facilities would occur. Further, the Beach Cities Health Center (514 North Prospect Avenue) would remain in place for the duration of construction of the proposed RCFE Building to allow most of BCHD's existing programs to continue.

Though demolition of the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) may occur as part of the Phase 2 development program, demolition of this building would not occur until after the end of existing tenant leases in 2030. Additionally, this building would be replaced with a purpose built medical office building.

Therefore, although the implementation of the proposed Project would result in the removal of 42,000 square feet (sf) of medical office from the Beach Cities Health Center, nearly 93,000 sf of medical office would remain on the BCHD campus.

Comment EN-3

The comment expresses opposition to the proposed plans for the Aquatic Center, claiming that outdoor swimming pools that can support lessons, swim teams, and rehabilitation would better address the needs of the community. This comment does not address the adequacy of the EIR or the impact analysis and represents the commenter's opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Healthy Living Campus Master Plan.

Comment EN-4

The comment expresses general concern regarding the construction impacts of the proposed Project on nearby schools. The EIR includes detailed discussion and analysis of construction-related impacts on nearby sensitive receptors, including Towers Elementary School. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a ton schools from construction-related hazards. Refer to Master Response 13 – Transportation Analysis for detailed discussion and response to comments pertaining to these issues.

Comment EN-5

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter ES

June 6, 2021
Elisabeth Schneider

Comment ES-1

The comment expresses general concern regarding the Project’s impacts on the health of surrounding sensitive receptors, particularly with regard to air quality. As described in Master Response 10 – Aesthetics and Visual Resources Analysis, the EIR provides a detailed analysis of constructed related air quality emissions and potential impacts on the health of nearby sensitive receptors, which was supported by an exhaustive quantitative modeling effort. With the implementation of Mitigation Measure (MM) AQ-1 construction activities would not result in criteria air pollutants or toxic air contaminants (TACs) that would exceed the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

Comment ES-2

The comment requests detailed information regarding the number of individuals located within 1 mile of the Project site that are diagnosed with chronic obstructive pulmonary disease (COPD), asthma, emphysema, and any other lung-related health conditions. Not only is this data collect not

possible due to the Health Insurance Portability and Accountability Act (HIPAA), but these comments do also not address to the adequacy of the EIR with regard to the air quality analysis and mitigation measures. Detailed discussion and analysis of Project impacts on air quality is presented in Section 3.2, *Air Quality*. As presented therein, based on detailed modeling of Project construction and operational emissions following approved methodologies adopted by local air quality management agencies, the proposed Project, with implementation of identified mitigation measures, would not generate air quality emissions that would create or contribute to the violation of air quality standards, which are established by Federal and State agencies for protecting the quality of the air and the health of residents of the air basin. Refer to Master Response 10 – Air Quality Analysis for detailed discussion of Project construction impacts on air quality, including those on nearby sensitive receptors, which include single-family residences located in the vicinity of the proposed Project.

Letter FB1

May 22, 2021
Frank Briganti
West Torrance

Comment FB1-1

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment FB1-2

The comment incorrectly claims asserts that West Torrance residents were not considered in the analysis of Project impacts. Contrary to this comment, the EIR includes detailed analysis of physical environmental impacts to surrounding sensitive receptors, including the single-family residential neighborhood to the east within the City of Torrance. For example, Section 3.1, *Aesthetics and Visual Resources* identifies representative views from this area. Additionally, Section 3.2, *Air Quality* and Section 3.11, *Noise* specifically identify sensitive receptors within this area. Section 3.14, *Transportation* thoroughly discusses cut-through traffic and potential safety hazards within this area. The assertion that the West Torrance residents were not considered is unfounded and not supported by the public record.

Comment FB1-3

The comment asserts that Towers Elementary School was not considered in the analysis of Project impacts. Please refer to response to Comment FB1-2 above for detailed discussion and response to comments regarding consideration of impacts within the City of Torrance. Towers Elementary School was specifically included and addressed as a sensitive receptor during the consideration of construction and operational impacts associated with the proposed Project. The assertion that Towers Elementary School was not considered is unfounded and not supported by the public record.

Comment FB1-4

The comment states, without substantial evidence or expert opinion, that proposed haul truck and construction equipment routes would impact West Torrance neighborhoods. As presented in Section 3.14, *Transportation*, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation. For additional discussion and a detailed response to comments pertaining to construction-related impacts, refer to Master Response 13 – Transportation Analysis.

It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Comment FBI-5

The comment states that the EIR does not identify Completion and Financial Bonds. However, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Comment FBI-6

The comment states, without substantial evidence or expert opinion, that the proposed Project would involve a massive commercial structure in a residential area that would generate window glare and lighting affecting nearby residents. However, the EIR does include detailed discussion and analysis of impacts on light and glare in Section 3.1, *Aesthetics and Visual Resources*. As discussed therein, lighting associated with the proposed Project would generally be similar in type and intensity to the lighting sources surrounding the Project site. The nearest light-sensitive receptors to the Project site include the multi-family residences to the north of Beryl Street and the single-family residences to the east of Flagler Lane. Dominguez Park to the northeast could also experience an increase in light intrusion from the Project. However, the lighting associated with the proposed RCFE Building would comply with Redondo Beach Residential Design Guidelines for Multi-Family Residential, which require that the type and location of building lighting preclude direct glare onto adjoining property, streets, or skyward, and all lighting be designed to shine downward. Additionally, the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. Due to the proposed increase in building mass and size, it is expected that the Project would include a greater number of windows and reflective surfaces than the existing Project site. The reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the Redondo Beach Municipal Code RBMC and prevent substantial glare. Architectural design and materials would be intended to minimize the lighting and glare effects on public views. For these reasons, the proposed Project would not constitute a new source of substantial nighttime light pollution or glare; therefore, effects would be less than significant.

Comment FBI-7

The comment asserts, without substantial evidence or expert opinion, that the proposed Project would result in rodent infestation in surrounding neighborhoods. Issues related to rodents are

discussed in the EIR, which notes that “[d]ue to the presence of the Silverado Memory Care Community and associated dining services on the BCHD campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus.” In light of this ongoing program, assertions that the proposed Project would result in vermin infestations are unfounded and speculative.

Comment FB1-8

The comment notes that there are too many dangers and safety problems to address. However, the comment provides no further details to clarify these concerns. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter FB2

June 9, 2021
Dr. Frank Briganti
Tomlee Avenue
Torrance, CA

Comment FB2-1

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment FB2-2

The comment incorrectly asserts that West Torrance residents were not considered in the analysis of Project impacts. Refer to the response to Comment FB1-2 for a detailed response to comments describing how West Torrance residences were considered as sensitive receptors and addressed throughout the environmental impact analysis provided in the EIR.

Comment FB2-3

The comment asserts, without substantial evidence or expert opinion, that noise, fugitive dust, and toxic or hazardous materials will directly affect nearby sensitive receptors. Contrary to the commenter’s assertion, these potential construction-related impacts were discussed in detail within

Section 3.11, *Noise*, Section 3.2, *Air Quality*, and Section 3.8, *Hazards and Hazardous Materials*. Additionally, mitigation measures were provided to reduce potential impacts to the maximum extent feasible. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

Comment FB2-4

The comment states, without substantial evidence or expert opinion, that the proposed Project would involve the construction massive commercial structure in a residential area, which would also generate window glare affecting nearby residents. The comment incorrectly claims that an analysis of potential impacts related to light and glare were not considered in the EIR. However, as described in the response to Comment FB1-6, the EIR does include detailed discussion and analysis of Project impacts on light and glare in Section 3.1, *Aesthetics and Visual Resources*.

Comment FB2-5

The comment states that there should be no truck routes for the proposed Project, as they would present safety issues in residential areas and delay emergency response. As presented in Section 3.14, *Transportation*, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. Refer to the response to Comment FB1-4 as well as Master Response 13 – Transportation Analysis for a detailed response to comments related to construction-related safety hazards and emergency access.

The comment further states that Redondo Beach Fire Station is too far from the Project site. However, as presented in Section 3.13, *Public Services*, the BCHD campus is located within Redondo Beach within approximately 1.2 miles of the three Rbfd fire stations, and is well within the 6-minute fire response time area and 6-minute and 20-second Emergency Medical Service (EMS) response time for the Redondo Beach Fire Department (Rbfd). Records indicate that a total of 451 EMS calls associated with the BCHD campus at 514 North Prospect Avenue occurred between January 2015 and July 2019, with an average of 98 calls per year and just over 8 calls per month for the 60 double-occupancy Memory Care units with 120 beds total. Thus, the Project site is considered to be well within the appropriate distance and response time for Redondo Beach Fire Stations.

Comment FB2-6

The comment states that the proposed Project is a commercial project disguised as a medical project. This comment does not address to the adequacy of the EIR with regard to the

environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Nevertheless, it should be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

Comment FB2-7

The comment asserts, without any substantial evidence or expert opinion that there is no problem reducing the size of the proposed Project. However, this comment provides no specific suggestions or details to further clarify this assertion. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Comment FB2-8

The comment requests eliminating the Silverado large expansion project and reduce time frame to 1 year only. However, this comment fails to acknowledge that by eliminating the proposed Memory Care community (and the proposed Assisted Living Facility) the proposed Project would not meet the basic project objectives. The project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD’s mission. Revenues from the long-term tenant leases support BCHD programs and services. Accordingly, the proposed development must replace revenue to support the current level of programs and services as well as generate new revenues to fund the growing future community health needs.

Comment FB2-9

The comment states that the EIR does not identify Completion and Financial Bonds. However, as described in the response to Comment FB1-5, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Comment FB2-10

The comment incorrectly asserts that working times have not been noted. As described in Section 2.5.1.6, *Construction Activities*, BCHD has proposed the following construction hours for the proposed Project, consistent with Redondo Beach Municipal Code (RBMC) Section 4-24.503 and Torrance Municipal Code (TMC) Section 6-46.3.1:

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

Comment FB2-11

The comment restates its assertion that West Torrance residents were not considered in the analysis. Refer to response FB1-2 for a detailed discussion and response to comments regarding consideration of impacts to West Torrance residents.

Letter FVC

June 10, 2021
Frank Von Coelln

Comment FVC-1

The comment states, without substantial evidence or expert opinion, that the Project would result in shade/shadow and privacy impacts on nearby residences. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues. It should be noted that the California Environmental Quality Act (CEQA) requires an assessment of impacts to public views rather than private views and privacy.

Comment FVC-2

The comment asserts, without substantial evidence, that the proposed Project would result in significant damage to blue sky views, glare and nighttime lighting, and shading. This comment is identical to that provided in Comment DH1-1. Refer to the response to Comment DH1-1 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments regarding impacts associated with aesthetics and visual resources, including height and size of the proposed Residential Care for the Elderly (RCFE) Building, access to skyline views, compatibility with the surrounding neighborhood, shade and shadow effects, and privacy concerns. The impact analysis included in Section 3.1, *Aesthetics and Visual Resources* is informed by photosimulations prepared by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, as well as renderings of the development under Phase 2 and a detailed shade and shadow analysis. The comment does not challenge any specific aspect of these technical studies or the policy consistency analysis described under Impact VIS-2.

Comment FVC-3

The comment asserts that representative views presented in the EIR are flawed and deceptive and were used to justify proposed mitigation. However, as described in Master Response 9 – Aesthetics and Visual Resources Analysis a total of six representative views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. These six representative views encircle the BCHD campus and provide west, southwest, south, and northeast facing views of the Project site. Representative Views 2, 3, and 5 in particular provide views of the Project site from a distance of less than 100 feet that are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter’s assertion that these views used in the analysis of visual impacts are deceptive or that the height of proposed development is underrepresented.

The comment appears to conflates impacts to scenic views and impacts to the visual character of the Project site and surrounding areas. With regard to maximum elevation views along West 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190th Street that provide slightly elevated views – including the intersection of Prospect & West 190th Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource. The EIR does not make any findings to neighbor

character based on long-range views from the intersection of Flagler Lane & 190th Street. Impacts to neighborhood character are addressed under Impact VIS-2. These findings are substantiated by photosimulations from five different locations located immediately adjacent to or in close proximity to the campus (refer to Figure 3.1-1) as well as a policy consistency analysis (refer to Table 3.1-2).

Therefore, the representative views identified and utilized in the analysis of this EIR are considered adequate to inform the analysis of impacts to aesthetics and visual resources consistent with the CEQA Guidelines, and inclusion or consideration of additional representative views is not necessary.

Comment FVC-6

The comment asserts, without substantial evidence, that the proposed RCFE Building is incompatible with surrounding neighborhoods and violates City of Redondo Beach and City of Torrance General Plan policies and municipal codes governing compatibility of scale, mass, and character of new development with surrounding neighborhoods. Refer to Master Response 9- Aesthetics and Visual Resources Analysis for further discussion on design revisions, building height, and visual character.

Comment FVC-7

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter FF1

April 12, 2021
Fred Fasen

Comment FF1-1

The comment questions how the proposed public/private partnership would benefit the citizens and residents of the Beach Cities. Additionally, the comment questions when taxpayers gave the Beach Cities Health District (BCHD) the right to develop public property. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and a response to concerns pertaining to the benefits of the proposed Project. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to

comments pertaining to the proposed public/private partnership. As described therein the BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

Comment FF1-2

The comment correctly describes that the proposed Project would result in significant and unavoidable noise impacts, which are described in detail within Section 3.11, *Noise* under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. However, it should be noted that the proposed Project would not result in a significant impact related to vibration. This issue is discussed in detail within Section 3.11, *Noise* under Impact NOI-2.

Comment FF1-3

The comment requests a new and improved BCHD be proposed for the taxpayers. However, the comment provides no specifics to further clarify this request or to offer additional alternatives that should be considered for analysis. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter FF2

May 26, 2021
Fred Fasen

Comment FF2-1

The comment asserts that the citizens didn't approve the 2019 Master Plan and that the revised Health Living Campus Master Plan. As described under Master Response 9 – Aesthetics and Visual Resources Analysis community feedback received from early public outreach efforts has helped guide revisions to the conceptual plans for the proposed Healthy Living Campus Master Plan, which was originally released to the public in June 2017. The original site plan included a 6-

level parking structure on the vacant Flagler Lot, a 7-story assisted living building, and a 4-story independent living building over 3 levels of parking. Community feedback was received on issues relating to building height, density of development, and the proximity of the proposed development to adjacent single- and multi-family residential land uses. To address these concerns, the 2019 Master Plan refined the original conceptual plan by removing the proposed parking structure from the vacant Flagler Lot, relocation of the parking to the southeast corner of the Beach Cities Health District (BCHD) campus, and reducing the height of the Residential Care for the Elderly (RCFE) Building to 4 stories by wrapping the building footprint along the eastern boundary of the campus. BCHD further revised the footprint of the RCFE Building to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 sf to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

Comment FF2-2

The comment generally asserts, without substantial evidence or expert opinion, that noise, traffic, and pollution generated by the proposed Project would be too much for the City of Redondo Beach. However, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Comment FF2-3

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final

EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter GD

June 6, 2021
Gary Dyo

Comment GD-1

The comment expresses general opposition to the proposed Project due to the duration of construction activities and comments provided further in this letter. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment GD-2

The comment asserts, without substantial evidence and expert opinion, that the proposed Project will block sunlight and obstruct views from all directions. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to the analysis of impacts on public views and shade and shadows. This analysis is supported by more than a dozen photographs as well as detailed computer-generated photosimulations and a shade and shadow study prepared by licensed architects. The comment does not challenge the thresholds, methodologies, or findings of these technical studies.

Comment GD-3

The comment notes that the Project site is located nearby existing residences and schools. The comment correctly notes that the Project site is located approximately 80 feet from the nearest sensitive receptor. It should be noted that Towers Elementary School is located approximately 350 feet from the Project site. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, and Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to the impacts on nearby residences and school.

Comment GD-4

The comment states that the proposed Project would result in 10,000 heavy haul truck trips coming into nearby residential neighborhoods. Refer to Master Response 13 – Transportation Analysis for

detailed discussion and response to comments pertaining to construction traffic and potential impacts the surrounding transportation network, including bicycle and pedestrian facilities.

Comment GD-5

The comment states that the proposed Project must not commence. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter GPA

June 10, 2021
George and Pam Afremow
19412 Linda Dr., Torrance

Comment GPA-1

The comment describes the commenters’ participation in previous public scoping and other public meetings held by the Beach Cities Health District (BCHD) and incorrectly implies that the Environmental Impact Report (EIR) ignores much of the public concern regarding impacts. Contrary to this assertion, the summary provided in Section 1.8, *Areas of Known Public Controversy*, clearly complies with the intent of California Environmental Quality Act (CEQA) Guidelines Section 15123, which is referenced in the comment and states that “[a]n EIR shall contain a brief summary of the proposed actions and its consequences.” The summary provides approximately 2 pages of bulleted issues that were known to be of concern during the preparation of the EIR. Additionally, as described in Section 1.8, *Areas of Known Public Controversy*, all comments letters received on the Notice of Preparation (NOP) were also provided as Appendix A to the EIR. Each of these comment letters was reviewed and marked up to identify individual environmental issues. Each of these issues was considered and responded to during the preparation of the environmental impact analysis provided in the EIR. The assertion that the community’s concerns have fallen on deaf ears is unfounded.

The comment further asserts that the proposed Project’s square footage and height have increased since the original site plan was released to the public in June 2017. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion of previous revisions to the proposed Health Living Campus Master Plan.

Comment GPA-2

The comment asserts, without substantial evidence or expert opinion, that the implementation of the proposed Project would result in impacts related to concrete dust, asbestos-containing material (ACM), lead, polychlorinated biphenyls (PCBs), and mold. Hazardous building materials are discussed in detailed in Section 3.8, *Hazards and Hazardous Materials*. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue. As described therein, Mitigation Measure (MM) HAZ-1 requires BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and potentially the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, the licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. During construction the licensed contractor shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed. MM HAZ-1 clearly meet the requirements for mitigation to avoid potential impacts related to the potential for exposure to hazardous building materials. Additionally, CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

It should also be noted that the comment incorrectly states that demolition and construction would occur for a period of 5 to 10 years. For clarification while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years.

It should also be noted that Towers Elementary School is located approximately 350 feet away from the Project site and the closest point between the BCHD campus boundary and the recreational field.

Comment GPA-3

The comment incorrectly claims that the proposed development does not conform zoning designation at the Project site. The comment states that the Project site was “*always intend to be for the use of, and the betterment of, the local residents.*” Refer to Master Response 3 – Project Need and Benefit, which provides a detailed discussion and response to comments pertaining to this issue. Refer also to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to land use compatibility. For decades, BCHD, which is a California Healthcare District, has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter the use of the BCHD campus, which would continue to provide needed community health and wellness programs and services, including needed senior housing. Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health treatment facilities, and residential care facilities are permitted in P-CF zones with a CUP. A Conditional Use Permit (CUP) is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at Silverado Beach Cities Memory Care Community. The proposed Project – like other improvements made on the BCHD campus in the past – would require a CUP that would be issued under the existing code. As described in RBMC Section 10-2.1116, the FAR, building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project does not conflict with any P-CF zoning codes.

Comment GPA-4

The comment states, without substantial evidence or expert opinion, that the proposed Project would double the traffic congestion in the area, disregarding the exhausting transportation analysis provided in Section 3.14, *Transportation*, which is supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments regarding construction-related and operational transportation issues, including issues related to vehicle, pedestrian, and bicyclist safety.

Comment GPA-5

The comment asserts, without substantial evidence, that the proposed development is not consistent with the character of the adjacent residential land uses. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to commenters pertaining to building height and visual character. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would comply with the required building height prescribed in RBMC Section 10-2.622 and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Beyond the subjective assertion that the building is not consistent with the character of the adjacent residential land uses the comment does not challenge any specific aspects of the analysis of visual character presented under Impact VIS-2 or provide any substantiating evidence to further support its assertion.

The comment also expresses concern regarding shade and shadows and obstruction of wind and coastal breezes, due to the size of the proposed Project. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the analysis of aesthetics and visual resources, including shade and shadows. As described in Section 3.1, *Aesthetics and Visual Resources*, a shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M). Further, the comment does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore wind patterns.

Comment GPA-6

The comment requests that BCHD does not go forward with the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter GP1

March 14, 2021
George Parker

Comment GP1-1

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment GP1-2

The comment describes a need for affordable housing senior housing. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments regarding the affordability of Assisted Living units and Memory Care are facilities. It should be noted that 10 percent of the proposed units are being considered at below-market rates. It should also be noted that BCHD would reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community, including lower-income individuals.

Comment GP1-3

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter GNY1

June 4, 2021
Glen & Nancy Yokoe
Residing on Tomlee Avenue
North Cul De Sac

Comment GNY1-1

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final

EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment GNY1-2

The comment expresses general concerns, without substantial evidence or expert opinion, regard air pollution, dust, hazards, noise, and traffic that will harm community. The comment also asserts the proposed Project is oversized and incompatible in its design and proposed uses with the site and surrounding land uses. Detailed discussion and analysis of Project impacts from air pollution, dust, noise, and traffic is provided in Section 3.2, *Air Quality*, 3.8, *Hazards and Hazardous Materials*, 3.11, *Noise*, and 3.14, *Transportation*. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion and response to comments regarding these issues. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

Comment GNY1-3

The comment references an excerpt from the Letter FL1 and asserts, without substantial evidence, that the EIR is deficient in its analysis of air quality, noise, transportation, and public health impacts and mitigation measures. Please refer to responses to Comments FL1-61 through FL1-72 for detailed discussion and response to comments pertaining to these issues.

Letter GNY2

June 10, 2021
Glen & Nancy Yokoe
West Torrance
Pacific South Bay Residents

Comment GNY2-1

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment GNY2-2

The comment generally asserts, without substantial evidence, that the EIR is deficient in its assumptions, omits data, minimizes impacts, and is lacking analysis with regard to aesthetics and visual resources, air quality, hazards and hazardous materials, land use, and noise. However, the commenter fails to provide specifics or further details to clarify how the EIR is deficient in these ways. A detailed discussion and analysis of potential impacts on aesthetics and visual resources, air quality, hazards and hazardous materials, land use, and noise is provided in Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.10, *Land Use and Planning*, and Section 3.11, *Noise*, respectively. Refer to Master Response 8 – Aesthetics and Visual Resources Analysis, Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues.

The comment also asserts that the description of the Phase 2 development program is vague and the analysis of aesthetics and visual resources lacks proper photosimulations. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of Analysis for a detailed discussion and a response to comments pertaining to the description of the Phase 2 development program.

Comment GNY2-3

The comment states, without substantial evidence, that the proposed development is incompatible with adjacent communities and violates City of Redondo Beach and City of Torrance General Plan policies. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for additional discussion regarding previous revisions to the proposed Healthy Living Campus Master Plan as well as a discussion of building height and visual character.

Comment GNY2-4

The comment asserts that demolition of the Beach Cities Health Center would expose nearby residents and schools to hazardous materials, irritants, and carcinogens. As described in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-2, construction activities would implement all applicable Federal, State, and local codes and regulations, best management practices, and required mitigation measures related to the treatment, handling, and disposal of hazardous materials to ensure public safety. Adherence to these regulations, best management practices, and mitigation measures would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public,

including nearby residences and schools. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments on this subject.

Comment GNY2-5

The comment asserts that excavation and trenching of contaminated soils would release hazardous materials affecting surrounding neighborhoods. This issue is addressed in detail in Section 3.8, *Hazards and Hazardous Materials*. While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that tetrachloroethylene (PCE) is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). With the implementation of the Mitigation Measure (MM) HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant.

Comment GNY2-6

The comment incorrectly asserts, without substantial evidence, that air quality onsite exceeds South Coast Air Quality Management District (SCAQMD). The EIR includes detailed analysis of construction-related air emissions in Section 3.2, *Air Quality*, supported by exhaustive quantitative air emissions modeling. With the implementation of MM AQ-1, construction-related air emissions would not exceed SCAQMD thresholds and would not create or contribute to air quality violations. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments regarding construction and operational air quality emissions.

Comment GNY2-7

The comment asserts that noise will exceed the Federal Transit Authority (FTA) thresholds adversely affecting hearing, interfere with sleep, result in physiological response, cause annoyance, and affect overall wellbeing of nearby residents. The comment correctly describes that the proposed Project would result in significant and unavoidable noise impacts, which are described in detail within Section 3.11, *Noise* under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding the temporary, but prolonged construction noise impacts on nearby sensitive receptors.

The comment does not provide any substantial evidence or expert opinion regarding the commenter's assertion that the proposed project would affect hearing, interfere with sleep, result in physiological response, etc.. However, it should also be noted that while other commenters have provided articles, studies, and literature reviews (e.g., refer to the responses to Letter TRAO, FL1, and FL2) they generally show no clear connection to the proposed Project or the environmental impact analysis in the EIR.

Comment GNY2-8

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter GDV

June 10, 2021
Grace DuVall

Comment GDV-1

The comment asserts, without substantial evidence or expert opinion, that the proposed Project would generate many health issues that would impact students at Towers Elementary and all surrounding schools and homes. The comment goes on to claim, without providing any specific or further detail, that the Environmental Impact Report (EIR) downplays significant impacts. However, contrary to the commenter's assertion, the EIR includes detailed analysis of potential impacts on nearby sensitive receptors throughout the EIR. This analysis is supported by technical studies and exhaustive modeling efforts prepared by recognized experts in their field. For example, the air quality analysis presented in Section 3.2, *Air Quality* presents the results of the California Emissions Estimator Model (CalEEMod) and construction Health Risk Assessment (HRA) prepared for the proposed Project by the air quality experts at iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. The CalEEMod results and the conclusion of the construction HRA are the results of carefully made assumptions reading schedule, duration, construction equipment, and application of air emissions control measures as well as robust air quality modeling. The air quality analysis compares the results of these studies to the quantitative significance thresholds established by the South Coast Air Quality Management District (SCAQMD) and meets all of the requirements in the California Environmental Quality Act (CEQA) Guidelines. The analysis demonstrates that with the implementation of Mitigation

Measure (MM) AQ-1, there impacts related to criteria air pollutants and toxic air contaminants (TACs) would be less than significant. Beyond simple assertions that construction activities would result in health impacts on sensitive receptors, the comments provided on this issue do not challenge the methodology, assumptions, or quantitative results of the technical studies or extensive quantitative modeling efforts.

Comment GDV-2

The comment states, without substantial evidence, that the proposed development is incompatible with adjacent communities and violates City of Redondo Beach and City of Torrance General Plan policies. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues. As described in Section 3.1, *Aesthetics and Visual Resources Analysis* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings.

Comment GDV-3

The comment requests more details regarding health impacts of air quality, hazardous materials, and noise, stating that the EIR is deficient in providing the full scope of health impacts. However, the commenter fails to provide specifics or further details to clarify how the EIR is deficient. The EIR provides detailed discussion and analysis of Project air quality, hazard, and noise impacts on the environment, as well as on nearby sensitive receptors, in Sections 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, and Section 3.11, *Noise*, respectively. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, and Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to these issues.

Letter GP2

April 13, 2021
Greg Podegracz

Comment GP2-1

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced

to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment GP2-2

The comment states, without substantial evidence that the proposed Project is too big and too intrusive on the surrounding neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Comment GP2-3

The comment asserts, without identifying specific locations, that there are plenty of locations around the South Bay that could support development of the proposed Project. The comment also states that the Beach Cities Health District (BCHD) could redevelopment the AES Redondo Beach Power Plant. However, as described in the response to TRAO-96, which also addressed this issue, the discussion in the EIR provides clear discussion of the barriers of completing the Project on alternative sites and meets the requirements of California Environmental Quality Act (CEQA) Guidelines Section 15126.6(f), which states that “[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” Specifically, CEQA Guidelines Section 15126.6(f)(2)(B) requires that “[i]f the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.” As an example, the discussion explains that the AES Redondo Beach Power Plant site is large enough, but is zoned as P-GP and would not allow for medical office and health-related facilities, or residential care facilities. BCHD could apply for a zoning change, but pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. For example, AES Redondo Beach LLC finalized the sale of the power plant site to a private developer in March 2020. The new owner of the site is currently considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. As described in CEQA Guidelines Section 15126.6(f)(3), “[a]n EIR need not consider an alternative...whose implementation is remote and speculative.”

Comment GP2-4

The comment again expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter HRP

May 17, 2021
Hamant and Robin Patel

Comment HRP-1

The comment asserts that information regarding economic, social, and housing factors must be added to the Environmental Impact Report (EIR) to allow the Beach Cities Health District (BCHD) to consider the factors in reaching a decision on the proposed Project. The comment goes on to state information regarding economic fairness of the Project, and asserts that the EIR does not provide sufficient analysis to support whether new residents would be from the supporting beach cities and whether these residents would be able to afford the monthly rent. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis “*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15131 specifically states “[*e*]conomic or social effects of a project shall not be treated as significant effects on the environment.”

Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units as well as Master Response 6 – Financial Feasibility for a detailed discussion and response to comments regarding the market feasibility analyses prepared for the proposed Project.

Comment HRP-2

The comment asserts that clarification is needed to define “*existing regional force*” from which construction of the Project would draw workers from. The comment further asks whether this regional workforce would benefit the supporting cities. For the purposes of this EIR, the existing regional workforce is defined as those residing within the Beach City and the Greater Los Angeles County Area that are able to work, and would be able to fulfill employment opportunities created by the proposed Project. Considering the Project would create new employment opportunities within the Beach Cities, the proposed Project has the potential to benefit local cities by helping to

reduce unemployment rates. These issues are discussed in detail in Section 3.12, *Population and Housing* and Section 4.4, *Growth Inducing Impacts*.

Comment HRP-3

The comment asserts that the EIR establishes that there would not be an economic labor benefit to the supporting cities. However, the EIR does not determine whether or not the proposed Project would result in an economic labor benefit. Rather, pursuant to CEQA Guidelines Section 15126.2(e), the EIR discusses “...*the ways in which the proposed Project could foster economic or population growth, the construction of additional housing, either directly or indirectly, in the surrounding environment.*” The discussion presented in Section 4.4, *Growth Inducing Impacts*, discloses that while the proposed Project is expected to draw most workers from the existing regional workforce, the proposed Project would not be considered growth inducing because it would not substantially affect long-term employment opportunities or require the construction of additional housing stock. Further, consistent with CEQA Guidelines Section 15126.2(e), this analysis does not assume that growth in the area is necessarily beneficial, detrimental, or of little significance to the environment.

Comment HRP-4

The comment asserts that additional information and analysis of the economic feasibility of the proposed Project is required, specifying that additional analysis supporting the need for the Project and the financial analysis for when the beach cities will recover their investment is needed. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to these issues.

Letter JE1

June 2, 2021
Jackie Ecklund
Torrance Resident

Comment JE1-1

The comment expresses general frustrations regarding the length of the Environmental Impact Report (EIR) and time available to read the complete document. The comment recognizes that the Draft EIR public review period was extended in light of the going COVID-19 pandemic, but the commenter describes that recent transitions in school schedules have made it more difficult for parents who work from home to review the document. As described in Section 1.4, *Public Review*

and Comments, the California Environmental Quality Act (CEQA) requires a 45-day comment period for the Draft EIR. However, the Beach Cities Health District (BCHD) has extended the comment period to 90 days in order to ensure the public has ample time to review and comment.

Comment JE1-2

The comment describes that Phase 1 of the proposed Project would take place near Flagler Lane and Beryl Street and asserts, without substantiating evidence or expert opinion, that the proposed Project would affect residents and students in the vicinity. Detailed discussion and analysis of Project impacts on air quality, hazards/hazardous conditions, and noise, as well as a detailed list of nearby sensitive receptors located in the vicinity of the Project, is provided in Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise*, respectively. In addition, detailed analysis of aesthetics and visual resources (e.g., building height, visual character, light and glare, and shade and shadows) and transportation, is provided in Section 3.1, *Aesthetics and Visual Resources*, and Section 3.14, *Transportation*. Within each of these sections of the EIR, the analysis compares reasonably foreseeable impacts of the Project to Federal, State, and locally adopted thresholds of significance. Where a potentially significant impact is identified, the EIR presents detailed mitigation measures to be implemented for the purpose of reducing impacts below the level of significance. However, where mitigation cannot feasibly reduce the impacts to a less than significant level, the EIR discloses the effects of the proposed Project for the purpose of providing such information to Project decision makers so that they may make an informed decision regarding adoption of the Project. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

Comment JE1-3

The comment states that construction noise is unavoidable and asks that a timeframe for construction be provided if construction is delayed. However, it is not the responsibility of the EIR to speculate delays in construction scheduling that may result from unpredictable circumstances, such as weather. The estimated construction schedule described in Section 2.5, *Proposed BCHD Healthy Living Campus Master Plan* is based upon the reasonable duration of time necessary to complete implementation of proposed improvements based upon the scope and scale of proposed improvements, typical construction hours, number of construction personnel, and other typical restrictions on construction schedule. These estimates were developed with significant input from construction managers/schedulers at CBRE and were supported by a robust Construction

Management Plan describing construction activities, sequencing, and heavy equipment requirements. Pursuant to CEQA Guidelines 15003, the description of construction activities clearly makes a “...a good-faith effort at full disclosure” and is based on detailed construction scheduling information provided by a well-renowned construction management firm with decades of experience managing projects far more complex than the proposed redevelopment of the BCHD campus.

The comment further asserts that construction noise would interfere with Tower’s Elementary School and people who work remotely from home. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to the analysis of noise and vibration impacts. It is important to note that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Therefore, the construction-related impacts of noise on the indoor learning environment would be less than significant. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the BCHD campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Nevertheless, in keeping with MM NOI-1, BCHD would be required to prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels experienced at Towers Elementary School. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. Torrance Unified School District (TUSD) has been notified of the proposed Project and has commented on the EIR (refer to Letter KB).

Comment JE1-4

The comment requests the measurements of the substation and generator and states that it would be dangerous to locate the substation across the street from residential homes on Diamond Street and North Prospect Avenue due to potential impacts from noise generated by the substation. As described in Section 2.5.1.4, *Utilities and Services*, the proposed Project design for the electrical distribution system includes a Southern California Edison (SCE) Substation Yard, medium voltage distribution system, and generator yard, which would be located along the south end of the Project

site. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments regarding to noise of the proposed SCE Substation Yard. As described therein, According to the National Electrical Manufacturers Association (2014) and Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50 feet, which is well below the L_{dn} noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed substation and electrical yard would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment.

For other issues related to the proposed substation yard and electrical generator, refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

Comment JE1-5

The comment states, without substantial evidence or expert opinion, that siting of a service entrance and loading dock and service entry/exit along Flagler Lane may create unsafe traffic conditions on Flagler Lane and Street, particularly for parents who pick-up and drop off students at Towers Elementary School. The comment further requests a traffic study be prepared for Towers Elementary School and Beryl Elementary School and analyze how the project would impact the intersection of Flagler Lane and Beryl Street. However, Section 3.14, *Transportation* already provides a detailed discussion and analysis of potential impacts, including effects on intersection operations, roadway congestion, traffic hazards, and vehicle conflicts along nearby roads and near schools in the proximity of the Project site. This analysis is supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues.

It should be noted that the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by taking a right off of Flagler Lane and exit taking a left turn onto northbound Flagler Lane. Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to long-term parking on the BCHD campus and as such, would not be a primary entrance. The transportation studies prepared by Fehr & Peers did not identify any geometric design or other safety hazards associated with the proposed circulation scheme.

Comment JE1-6

The comment requests a revision to Figure 2-10 to include the name of Beryl Street. The comment also requests that Towers Elementary School and parents be notified of Project construction and hauling. Beryl Street is currently labeled on Figure 2-10 and no edits to this figure are required. With regard to notification of construction and hauling activities, as part of MM NOI-1 described in Section 3.11, *Noise*, BCHD shall be required to distribute notices to residents and property owners prior within a 0.25-mile radius prior to initiation of construction activities. It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the construction haul routes.

Comment JE1-7

The comment asserts, without substantial evidence or expert opinion, that concrete dust, asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyl (PCBs), and mold could have adverse on nearby sensitive receptors . Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue. As described in Section 3.8, *Hazards and Hazardous Materials*, hazardous building materials were identified in the Phase I Environmental Site Assessment (ESA) as having the potential to occur based on the age of the buildings. However, Mitigation Measure (MM) HAZ-1 requires BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center during Phase 1 as well as the existing parking structure and potentially the Beach Cities Advanced Imaging Building during Phase 2. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable BMPs, related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. The implementation of these measures described in MM HAZ-1 would ensure that impacts to the sensitive receptors identified in the comment would be less than significant.

Comment JE1-8

The comment asserts that the EIR fails to identify the high school track teams which use Del Amo to run westward to practice, as well as many other surface streets, as a potential receptors to air pollution. However, as stated in Section 3.2, *Air Quality*, a total of 11 schools were identified within 0.5 miles (2,640 feet) of the Project site. These include: Beach Cities Child Development Center (preschool), Towers Elementary School, Beryl Heights Elementary School, Redondo Shores High School, Redondo Beach Learning Academy, Redondo Union High School, Jefferson Elementary School, Parras Middle School, Our Lady of Guadalupe School, Valor Christian Academy, and West High School. There are also many public parks in the vicinity, including Dominguez Park, Sunnyglen Park, Entradero Park that are presented in Table 3.2-4. All of these uses, as well as the activities they support (e.g., sports teams and practices), are considered to be sensitive to construction emissions during construction activities associated with the Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to the analysis of air quality impacts on these nearby sensitive receptors.

Comment JE1-9

The comment requests clarification on whether the anticipated 170 new jobs created by the Project would be part-time or full time. As discussed in Section 3.12, *Population and Housing* as well as Section 4.4, *Growth Inducing Impacts*, the proposed Project is expected to employ 170 full-time equivalent employees.

Comment JE1-10

The comment notes that the EIR incorrectly states that the Providence Little Company of Mary Medical Institute Building is described as being 4 stories in height in Section 3.1, *Aesthetics and Visual Resources*. This single refer to the 4-story Providence Little Company of Mary Medical Institute Building has been revised for consistence with the Section 2.0, *Project Description* as well as the remainder of Section 3.1, *Aesthetics and Visual Resources*. It should be noted that this administrative correction does not affect the impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*. The comment further states that it should be clarified that the Beach Cities Health Center is 4 stories above ground and 1 story below ground. However, the Beach Cities Health Center building is in fact 5 stories above ground, and includes 2 below ground levels. The EIR correctly characterizes the Beach Cities Health Center building as being 5 stories in height.

Comment JE1-11

The comment requests that the EIR include analysis of how the Project would affect afterschool practices held at the Towers Elementary School, as well as nearby homeowners that have invested money to install solar. Section 3.1.1, *Environmental Setting* describes the existing solar collectors atop single-family residences located in the neighborhood to the east of the Project site. These residences are included in the list of shade-sensitive receptors considered in Impact VIS-4. As described in Impact VIS-4 shadow-sensitive land uses adjacent to the Project site consist of residential buildings, including windows and private yards at most houses, Towers Elementary School to the east, and Dominguez Park to the northeast. The vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the BCHD campus and the Torrance residences below. Shadow-sensitive uses, including the existing residences and associated rooftop solar collectors, to the east of the Project site would not be shaded by the proposed structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be less than significant. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to the shade and shadow analysis.

Comment JE1-12

The comment expresses concern regarding the compatibility of the proposed Project with surrounding development with regard to aesthetics. The comment expresses disagreement, without substantial evidence, with findings of the EIR. The comment does not challenge any specific aspects of the thresholds, methodologies, or impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*, which is supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Consistent with CEQA Guidelines Section 15204(b), “...if persons...believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant.” Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment JE1-13

The comment requests that the EIR provide heights and growth rates of any foliage/trees to be planted under the Project, and states that many of the trees listed are slow growth trees that would not mitigate the aesthetic impacts of the proposed Project. As described in Section 2.5.1.1, *Proposed Uses*, the perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees consistent with the Torrance Street Tree Master Plan that are adapted to the climate of Southern California. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening. As further described in Section 2.5.1.1, *Proposed Uses*, perimeter green space and landscaping would be intended to soften the campus interface and provide connections with the surrounding uses. Therefore, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts. However, while the landscaping would obscure the proposed building, the finding of less than significant impacts does not rely on landscaping alone. Refer to Mater Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding the analysis of impacts on aesthetics and visual resources.

Comment JE1-14

The comment states that the 8.5 story parking structure would create shade for the Torrance neighborhood, and the EIR should describe how shade would impact surrounding neighborhoods. Refer to Mater Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding the analysis of shade impacts on surrounding neighborhoods. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-4, “[a] shade and shadow study was also prepared for the Phase 2 development assuming a maximum height of the parking structure of 81 feet (see Appendix M). As with the Phase 1 development, shadow-sensitive uses would not be affected by shadows from structures developed under Phase 2 for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October) shade and shadow impacts would be less than significant.”

Comment JE1-15

The comment asserts that the EIR filed to consider or address impacts associated with drivers who speed through nearby intersections and along local streets. However, contrary to the commenter’s assertion, Section 3.14, *Transportation* also provides a detailed analysis of potential operational

design hazards and accident potential. As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation impacts.

Comment JE1-16

The comment requests that the EIR present an additional alternative involving the passage of a bond or slight membership increase for classes offered by the Healthy Living Campus that would address the financial shortfall of BCHD. However, it should also be noted that the EIR does consider Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space), which contemplates placing a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. However, the success of a local bond measure is speculative, particularly given the history of recent bond measure initiatives in the South Bay.

Comment JE1-17

The comment restates concerns that the proposed Project is too tall, providing contrasting examples of the Oakmont and Kensington Assisted Living facilities, which are 2 stories and 3 stories respectively. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building heights and visual character.

Letter JE2

June 9, 2021
James Ecklund

Comment JE2-1

The comment expresses general concerns regarding the projected energy demand for the proposed Project. As discussed in Section 3.5, *Energy*, the estimated energy demand is conservative in that it does not account for the sustainability features described for the proposed Project including photovoltaic solar panels, solar hot water systems, high efficiency heating, ventilation, and air conditioning (HVAC) systems, etc. (refer to Section 2.5.1.5, *Sustainability Features*). The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental

Design (LEED) Gold Certification. LEED is a national certification system developed by the USGBC to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. Therefore, consistent with the conclusions in Impact EN-1, the proposed Project would not result in wasteful or inefficient use of energy.

Comment JE2-2

The comment requests the EIR include an analysis of impacts of the proposed electrical yard, particularly an analysis of noise impacts and operation of the substation. Refer to Master Response 12 – Noise Analysis. As described therein, according to the National Electrical Manufacturers Association (2014) and Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50 feet, which is well below the ambient L_{dn} noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed electrical yard would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment.

As described in Section 2.5.1.4, Utilities and Services, the proposed Project design for the electrical distribution system includes a SCE Substation Yard, medium voltage distribution system, and generator yard, which would be located along the south end of the Project site. Additionally, views of this utility area would be screened from residences to the south by large shade trees.

Comment JE2-3

The comment suggests updating Table 3.5-1 to include 2018 electricity consumption for the City of Redondo Beach, given that 2018 data is presented for the County of Los Angeles. As noted below Table 3.5-1 and described in Section 3.5.1, *Environmental Setting*, the most recent publicly available data for the Redondo Beach and Torrance is provided in the Redondo Beach and Torrance Energy Efficiency Climate Action Plans (EECAPs), which include data from 2012.

The comment again expresses concern regarding the projected energy demand for the proposed Project. Refer to the individual response to Comment Response JE2-1.

Comment JE2-4

The comment characterizes the EIR as misleading, citing the fact that the projected energy demand presented in Section 3.5, *Energy* does not include sustainability features and the labels for the electrical yard in different figures. The EIR considers a worst-case scenario of the potential energy

demand of the proposed Project to provide a conservative analysis. Regarding the labels for the electrical yard in different figures, this is not meant to be misleading. Rather, the numbering of features on the figures is based on the number of features included in the figure. The Electrical Yard is clearly labeled on all figures included in the EIR.

The comment also claims the EIR contains non-pertinent information regarding California's electricity generation data. This information is pertinent to the analysis of energy impacts as it provides a description of the energy consumption per capita in California.

Letter JH

May 25, 2021
Jack Holman

Comment JH-1

The comment provides a slight grammatical correction to a previously made comment on the Environmental Impact Report (EIR) and expresses continued opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JB1

June 9, 2021
Jay Bichanich
Torrance Homeowner and Resident

Comment JB1-1

The comment expresses concern over noise created by construction-related vehicle trips – particularly truck trips – during construction activities associated with the proposed Project. The EIR includes thoroughly quantifies and discloses these temporary, but prolonged construction-related impacts in Section 3.11, *Noise*. As described under Impact NOI-1 haul trucks typically generate traffic noise levels of 85 dBA L_{max} at 50 feet. Temporary construction-related trips would increase daytime noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). Noise contributions from these haul truck trips would be imperceptible (i.e., less than 3 dBA). In addition, the Construction Traffic and Access Management Plan under MM T-2, would require that construction haul trucks avoid residential neighborhoods to the maximum extent feasible, which would reduce roadway noise levels during construction. It should also be noted

that haul trucks would be used during site clearing and demolition phases as well as during excavation of the subterranean levels of the proposed Residential Care for the Elderly (RCFE) Building during Phase 1 as well as the parking structure during Phase 2. The proposed Project would result in up to 78 heavy truck trips per day over a 30-week period in Phase 1 and up to 30 heavy truck trips per day over a 35-week period in Phase 2. These impacts would not persist for a continuous period of 5 years as stated in the comment. Refer to Master Response 12 – Noise Analysis for additional discussion related to the quantification and assessment of noise impacts provided in Section 3.11, *Noise*.

Comment JB1-2

The comment expresses concern over increases in ambulance trips associated with the proposed Assisted Living units and Memory Care units. This issue is discussed at length in Section 3.11, *Noise* and Section 3.13, *Public Services*. Phase 1 of the proposed Project would incrementally increase the total number of individuals requiring ambulance services through the overall addition of 177 new Assisted Living bed spaces to the existing 120 Memory Care bed spaces, bringing the total permanent residents supported at the site to 297. Based on an assumed average of 0.82 annual calls per bed space per year to the existing campus (refer to Section 3.13, *Public Services*), following the completion of the proposed development under the Phase 1 preliminary site development plan, it is anticipated that the BCHD campus would generate an estimated 244 ambulance calls per year. While estimated emergency calls would increase by 149 percent, all responses would be sporadic and not all would require use of sirens, as a majority of these calls are related to medical situations that do not always require an emergency response. Because emergency vehicle response is rapid by nature, the duration of exposure to these peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic. Thus, given the infrequent and short duration of siren utilization responding to emergency situations, noise impacts from emergency vehicles would be both negligible and less than significant. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions that increased ambulance visits would result in persistent sirens blaring.

The comment also asserts that the proposed Project would result increased tenant visitor traffic and congestion on neighboring streets. Refer to Master Response 13 – Transportation Analysis for further discussion on potential transportation impacts related to operational vehicle trips and cut through traffic. Both of these issues are addressed as a part of a comprehensive trip generation analysis associated with the proposed Project. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions that proposed Project would result increased tenant visitor traffic and congestion on neighboring streets.

Comment JB1-3

The comment expresses concern over impacts to property values of nearby residences. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, the California Environmental Quality Act (CEQA) requires that the environmental impact analysis “...*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “*significant effect on the environment*” as “*a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.*” Accordingly, the EIR analyzes the potential physical adverse effects of the proposed Project (CEQA Guidelines Section 15358[b]). Potential property value loss in and of itself is a not physical impact required to be evaluated in a CEQA-compliant analysis. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*).

Comment JB1-4

The comment states that the proposed Project would not fit the character of the surrounding neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further discussion on the height and sized of the proposed RCFE Building as well as the compatibility with the surrounding neighborhood.

Letter JS1

June 4, 2021
Jaysen Surber

Comment JS1-1

The comment provides a general statement of opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JW

March 21, 2021
Jeff Widmann
414 Sierra Vista drive
Redondo Beach, 90277

Comment JW-1

The comment offers empathy regarding the challenge of drafting the Environmental Impact Report (EIR). This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment JW-2

The comment requests development of a 25-yard long multi-lane swimming pool as part of the proposed Aquatics Center in Phase 2 of the proposed Project. Again, this comment does not address the adequacy of the EIR; however, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. As described in Section 2.5.2.1, *Proposed Uses*, the outdoor portion of the Aquatics Center could include an outdoor pool that would be designed for fitness activities such as lap swimming, aquatic fitness classes.

Comment JW-3

The comment expresses support for the proposed Project and the EIR. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JS2

April 13, 2021
Jennifer Sams

Comment JS2-1

The comment provides a general statement of opposition to the proposed Project, due to the size and scope of the Project and its compatibility with the surrounding residential neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining to building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment also expresses general concern, without substantial evidence, regarding air emissions noise, and traffic associated with the proposed Project. These issues are addressed in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment JS2-2

This comment expresses concern for the loss of privacy for the residents in the West Torrance neighborhood to the east of the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining privacy concerns. As discussed therein, the existing campus, which was originally developed in 1958, currently provides views across the single-family residential neighborhood to the east as a result of the existing topography (i.e., the campus ground level is approximately 30 feet higher than the ground level in the adjacent neighborhood). Many of the backyards in the first row of residences adjacent to the Beach Cities Health District (BCHD) campus are visible from the fourth and uppermost floor of the Beach Cities Health Center under existing conditions. As described in Section 1.0, *Introduction*, the proposed RCFE Building would be sited along the northern perimeter of the BCHD campus behind the Redondo Village Shopping Center. This proposed siting located reduces the proposed building massing along the eastern boarder of the campus adjacent to the single-

family residential neighborhood within the City of Torrance. While residential areas would still be visible from some areas of the BCHD campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

Comment JS2-3

The comment claims, without substantial evidence, that adjacent residents would be forever in shadow. The comment does not acknowledge the extensive aesthetics impact analysis of this issue provided in Section 3.1, *Aesthetics and Visual Resources*, supported by the preparation of a detailed shade and shadow study by a licensed architect. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining to shade and shadow impacts.

Comment JS2-5

The comment expresses general concerns, without substantial evidence or expert opinion, about traffic and air pollution during the construction period. The comment also claims, again without substantial evidence or expert opinion, that student learning would be affected. These issues are addressed in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. However, while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17).

It should also be noted that the comment incorrectly states that demolition and construction would occur for a period of 5 to 10 years. For clarification while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years.

Comment JS2-5

The comment questions the benefits of the Project for residents of Torrance and suggests development of the Project in an alternative location. Refer to Master Response 3 – Project Need and Benefits for a detailed discussion and response to comments pertaining to the benefits of the proposed Project. Regarding potential alternative locations for the proposed Project, Section 5.4, *Alternatives Considered but Rejected from Further Analysis* explores the requirements for potential alternate sites. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development.

Comment JS2-6

The comment again expresses opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JM

March 30, 2021
Jim Mooney
1022 Fourth Street
Hermosa Beach, CA 90254

Comment JM-1

The comment asserts that N. Prospect Boulevard “*is already overwhelmed with PCH-diverted traffic, especially during rush hours*” and that other intersections in the Project vicinity are overcrowded, especially during commute times. The comment continues with anecdotal evidence of traffic accidents and pedestrian-vehicle safety conflicts.

First, it should be noted that pursuant to Senate Bill (SB) 743 and California Environmental Quality Act (CEQA) Guidelines Section 15064.3, vehicle miles travel (VMT) has replaced roadway capacity-based or automobile delay-based level of service (LOS), as the metric for transportation impact analysis (refer to Section 3.14, *Transportation*). Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation to help the cities and interested residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. The scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and VMT analysis. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the BCHD campus (when most cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods, with no measurable increase in cut-through traffic forecasted by the study.

Section 3.14, *Transportation* also provides a detailed analysis of potential operational design hazards and accident potential. As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation impacts.

Comment JM-2

The comment expresses opposition to the density of the proposed Project considering the already crowded beach community. It should be noted that the comment fails to acknowledge the detailed analysis of potential impacts to population, housing, and employment provided in Section 3.12, *Population and Housing*. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment JM-3

The comment expresses opposition to the size of the Project and claims the Project would result in 15 years of construction. First, it should be noted that the comment incorrectly states that demolition and construction would occur for a period of 15 years. For clarification while the total duration of construction would last for a period of 5 years, Phase 1 of construction would last for a period of 29 months and Phase 2 would last for a period of 24 months. These two phases of construction would be separated by a minimum of 5 years.

The only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. All other potential impacts identified in the EIR – including impacts to transportation – were determined to be less than significant or less than significant with the implementation of required mitigation measures. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.) Each of the conclusions provided in the EIR – including the disclosure of the significant and unavoidable construction-related noise impacts – is supported by substantial evidence, technical studies, and/or exhaustive quantitative modeling efforts prepared by experts in their field.

Comment JM-4

The comment suggests development of the Project in an alternative location and expresses opposition to the Project. Regarding potential alternative locations for the proposed Project, Section 5.4, *Alternatives Considered but Rejected from Further Analysis* explores the requirements for potential alternate sites. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JL

June 9, 2021
Jingyi Li

Comment JL-1

The comment provides a general statement of opposition to the Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment JL-2

The comment expresses general concerns, without substantial evidence, regarding construction-related air quality impacts on schools and residents. However, as described in Master Response 10

– Air Quality Analysis, impacts related to dust and other criteria pollutant emissions would be less than significant with mitigation. The construction emissions associated with Phase 1 and Phase 2 of the proposed Project were estimated using the South Coast Air Quality Management District’s (SCAQMD’s) California Emissions Estimator Model (CalEEMod), as prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

Comment JL-3

The comment asserts that the buildings included as part of the proposed Project would block sunlight and views for each and every house from all directions. The comment does not acknowledge the extensive aesthetics impact analysis of this issue provided in Section 3.1, *Aesthetics and Visual Resources*, supported by the preparation of a detailed shade and shadow study by a licensed architect. Refer to Master Response 9 – Aesthetics and Visual Resources for detailed discussion and response to comments pertaining to shade and shadow impacts.

Comment JL-4

The comment claims that the Project would result in an increase in traffic that would make everyone’s commute substantially longer and more difficult. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to operational vehicle trips. As described therein, implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). After completion of Phase 2, the proposed Project would generate a net increase of 376 new daily trips as compared with existing conditions. While operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing trip generation at the Beach Cities Health District (BCHD) campus. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the BCHD campus (when most cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times.

Comment JL-5

The comment expresses appreciation for the commercial uses in the Redondo Village Shopping Center and requests that these uses not be taken away. The proposed Project would not result in the demolition or removal of any of the uses located in the Redondo Village Shopping Center,

which is located adjacent to the north of the Project site. Refer to Figure 2-2 for a depiction of the Project site boundaries.

Comment JL-6

The comment again expresses opposition to the Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JD1

Joan Davidson
1525 Via Arco
Palos Verdes Estates, CA 90274

Comment JD1-1

The comment claims that the Environmental Impact Report (EIR) should have used the AERMAP for terrain processing in AERMOD. However, the construction Health Risk Assessment (HRA) was conducted in accordance with the South Coast Air Quality Management District (SCAQMD) and California Office of Environmental Health Hazard Assessment (OEHHA) guidance. The AERMOD dispersion model conservatively modeled all sources and receptors at zero elevation pursuant to SCAQMD's guidance, which recommends that if all receptor elevations are lower than the base elevation of the source, dispersion modeling should assume the non-default flat terrain option. Modeling the sensitive receptors at elevations below the Project site, as suggested by the comment, would result in a less conservative analysis showing a reduction in exposure.

Comment JD1-2

The comment claims the meteorological data used for the dispersion modeling conducted for the proposed Project is not valid given that this data was collected from the Hawthorne Airport Meteorological Station (Station ID 3167) between 2012 and 2016. It should be noted that there are 24 meteorological stations throughout the South Coast Air Basin. The SCAQMD published AERMOD-ready meteorological data from these stations here: <https://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod>. As clearly described in the HRA, the data used in the AERMOD analysis is the most recently available meteorological data from the meteorological station nearest the Project site. Therefore, the use of this data is consistent with SCAQMD and

OEHHA guidance. The comment fails to describe why this data is invalid or suggest another SCAQMD-approved data source.

Letter JD2

June 10, 2021
Joan Davidson
1525 Via Arco
Palos Verdes, CA 90274

Comment JD2-1

The comment requests confirmation of receipt of both emails. Both of these emails have been received and comments included therein as well as responses to these comments have been incorporated into the Final Environmental Impact Report (EIR) as a part of the response to comments.

Comment JD2-2

The comment describes the historical use of a pond in Dominguez Park as a sewage evaporation area. The comment asserts that the EIR does not determine whether the former pond located on-site between 1924 and 1947 was used for similar purposes and whether the pond resulted in hazardous chemicals and potentially sewage wastes on-site. The EIR thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). As described in Table 3.8-1, the pond was located on the Project site during a period of time when it was developed for agricultural uses. While neither the Phase I nor the Phase II ESA could determine the exact purpose of the pond, the Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants. Three of the screened contaminants were detected in excess of their residential screening levels: tetrachloroethylene (PCE), benzene, and chloroform. All three of these contaminants are classed as volatile organic compounds (VOCs). No indicators of sewage wastes were identified in the sampling effort.

The comment requests additional information regarding the source of the former pond on-site given that groundwater was not encountered to a maximum of 30 feet below ground surface (bgs) during soil borings, as well as its potential effects on environmental and geologic hazards, including ground stability. The comment goes on to claim that the EIR does not analyze the land subsidence at Dominguez Park and whether this is a similar possibility of instability or subsidence at the Project site. It should be noted that the former pond, whatever its purpose, was removed and graded over 70 years ago and the Project site has been graded and developed to support the existing

BCHD campus buildings. Existing geologic and soils hazards at the Project site, including but not limited to liquefaction, landslides, slope instability, subsidence, and differential settlement, were thoroughly assessed based on the Geotechnical Report prepared by Converse Consultants (2016) and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation, and California Emergency Management Agency (Cal EMA). The issue of geologic hazards is discussed in detail in Section 3.6, *Geology and Soils* under Impact GEO-1, which describes that the Project site is not located within a designated liquefiable area mapped by the State or the Redondo Beach Local Hazard Mitigation Plan Liquefaction Zones Map. Additionally, the Geotechnical Report prepared for the proposed Project categorizes the underlying soils as silty and clayey sands with low risk of liquefaction. Therefore, required compliance with the California Building Code (CBC) would ensure that potential impacts associated with liquefaction would be less than significant. Further, the proposed Project would not be located on an unstable geologic unit or soil that is made unstable as a result of the proposed Project or an expansive soil creating a substantial risk to life or property. Compliance with all applicable State and local regulations as well as the recommendations of the Geotechnical Report as required by Mitigation Measure (MM) GEO-1 would ensure that potential impacts associated with geologic and soil hazards would be less than significant.

Comment JD2-3

The comment incorrectly asserts that the EIR does not describe the former landfill at 200 Flagler Lane and the resulting potentially hazardous contamination. The former landfill is described in detail in the Phase I ESA and Section 3.8.1, *Environmental Setting*. As described therein, “[t]his landfill operated from 1904 to 1967, during which time it accepted ‘inert, residential’ waste. The landfill was closed and underwent cleanup beginning in January 1989, after which it was issued a ‘completed-case closed’ designation by the Los Angeles RWQCB on October 1, 2012. The property is currently developed as Dominguez Park...” As previously described, the EIR thoroughly discloses and discusses the existing conditions on the Project site, including the potential for hazardous soil and soil vapor contamination beneath the site, which was informed by the completion of Phase I and Phase II ESAs, a firm with decades of experience preparing environmental due diligence studies for development projects across California.

Comment JD2-4

The comment contends that the known contamination on-site could result in health impacts that have not been addressed by the EIR. However, contrary to the commenter’s assertion, the EIR

thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II ESAs. The Phase II ESA included 15 soil borings drilled across the Project site for the purpose of screening for the presence of contaminants. Three of the screened contaminants were detected in excess of their residential screening levels: PCE, benzene, and chloroform.

While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, *Hazards and Hazardous Materials*). The implementation of MM HAZ-2a through HAZ-2d would ensure that PCE and the other identified VOCs – including benzene and chloroform, which were detected in limited areas – are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through HAZ-2d impacts would be less than significant.

The comment goes on to assert, without substantial evidence or expert opinion, that it is unlikely the PCE contamination beneath the Project site traveled approximately 600 feet from the former dry cleaners and requests that the EIR prove the source of this contamination is from the dry cleaners rather than the existing BCHD campus. It should be noted that the former dry cleaner at 1232 Beryl Street is located approximately 70 feet away from the northern perimeter of the Project site and approximately 290 feet away from the vacant Flagler Lot. As described in Section 3.8.1, *Environmental Setting*, the Phase II ESA determined that the former dry cleaner that operated at the Redondo Village Shopping Center is suspected to be a source of PCE soil contamination at the Project site and the neighboring properties. Beginning in the mid-1930s, the dry cleaning industry began to use PCE as a primary solvent due to its cleaning power and compatibility with most clothing.

With regard to long-term remediation activities, as described in Section 3.8.1, *Environmental Setting*, BCHD has previously notified the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and the Los Angeles Regional Water Quality Control Board (RWQCB) of the recently discovered PCE contamination and is working with these the agencies

and other public entities (i.e., City of Redondo Beach and City of Torrance) to address the sampling results and identify the responsible party. As the Certified Unified Program Agency (CUPA) for Redondo Beach, LaCoFD will be responsible for overseeing the required remediation activities by the responsible landowner. The responsible landowner will be required to determine the extent of the PCE contamination, develop a treatment plan, notify surrounding landowners, and implement the cleanup.

Comment JD2-5

The comment claims that although the Los Angeles RWQCB issued a completed-case close designation for the Leaking Underground Storage Tank (LUST) case, there is no determination that the Project site is appropriate for residential development. As described in Section 3.8.1, *Environmental Setting*, it should be noted that the LUST case was associated with the Shell gas station located at 1200 Beryl Street, which was originally listed as a cleanup site due to gasoline contamination. Soil sampling conducted as a part of the Phase II ESA did not identify any indicators of contamination on the Project-site as a result of this previously closed LUST case.

The comment goes on to assert that the EIR does not provide information regarding the human health concerns associated with the previously plugged and abandoned oil and well. However, contrary to the commenter's assertion, the EIR clearly describes potential hazards associated with the previously plugged and abandoned oil and gas well. As described in Section 3.8.1, *Environmental Setting*, Total Petroleum Hydrocarbons (TPH) in the heavy oil range was detected in two samples at boring locations within the vacant Flagler Lot at concentrations of 20.9 and 123 milligrams per kilogram (mg/kg), respectively, which are well below the Department of Toxic Substances Control (DTSC) and U.S. Environmental Protection Agency (USEPA) residential screening level of 180,000 mg/kg. In September of 2020, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities.

The comment expresses general concerns, without substantial evidence or expert opinion, regarding airborne PCE contamination – particularly with respect to the schools and residents in the vicinity of the Project site as well as workers and visitors on-site – and incorrectly states that these issues are not addressed in the EIR. As previously described in response to Comment JD2-4, PCE is generally only hazardous when encountered in a confined space where it can exceed the

CAA limits and OSHA exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form) (refer to Section 3.8, *Hazards and Hazardous Materials*). The implementation of MM HAZ-2a through -2d would ensure that PCE and the other identified VOCs are properly detected and managed during ground disturbing activities consistent with existing State regulations and guidelines provided by relevant regulatory agencies. Therefore, with the implementation of the MM HAZ-2a through HAZ-2d impacts would be less than significant.

Previous indoor air quality sampling conducted during the Phase II ESA determined that the existing buildings on the BCHD campus have not experienced vapor intrusion from subsurface contamination. Further development under the proposed Project would include preventive measures to ensure vapor intrusion does not occur in new structures. For example, the foundations of all newly proposed structures – including the RCFE Building as well as the buildings constructed as a part of the Phase 2 development program – would be constructed over a gravel layer which would be topped by a thick (40 to 100 millimeter) vapor-intrusion barrier system to prevent subsurface contaminated vapors from entering an overlying structure. Additionally, the foundations would be designed with subgrade piping to capture and convey volatilized PCE through carbon filters before outgassing the vapor at a controlled rate. Again, because PCE is generally only hazardous when encountered in a confined space where it can exceed the CAA limits and OSHA exposure limits, outgassing vapor to the ambient air after passing it through a carbon filter would not create a hazardous impact to the surrounding environment. Such measures would be subject to strict inspection and monitoring requirements carried out by LACoFD. Therefore, with the implementation of this standard construction technique for addressing vapor intrusion, outgassing of filtered emissions, and closing monitoring and enforcement by regulatory agencies, operational impacts associated with PCE would not release hazardous materials into the environment or create a hazard to the public, including the nearby residences and school.

Finally, the comment briefly asserts that the EIR fails to quantify the diel and other airborne contamination at the four schools within a 0.25-mile radius of the BCHD campus. However, contrary to this assertion, exhaustive air quality modeling, including the preparation of a construction HRA was prepared by iLanco to evaluate this issue. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to this issue.

Comment JD2-6

The comment notes that the vacant Flagler Lot is unpaved, allowing stormwater to infiltrate into the ground and states the EIR fails to determine how the infiltration would reach 600 feet away at BC 1 and BC 2 borings. It is not clear what is meant by this comment. It should also be noted that

soil boring B-1 is located approximately 210 feet from the vacant Flagler Lot and B-2 is located approximately 765 feet from Flagler Lot.

The comment goes on to assert that the EIR fails to conduct a comprehensive study of the water table that is the top level of groundwater and that the EIR fails to analyze the effects of construction, runoff, and future use of BCHD on the contamination of groundwater . Publicly available references for Well ID #725J, State #4S14W08E03, and the Lofty Engineering (1997) report could not be located and were not provided as a part of the comment. However, soil borings were collected as a part of the Phase II soil sampling as well as the Geotechnical Report prepared for the proposed Project. Neither sampling effort identified groundwater. Additionally, as described further in the Geotechnical Report, which was prepared by a registered professional geologist, groundwater is not anticipated to be encountered during construction.

Other issues related to groundwater hydrology and groundwater quality are discussed in detail in Section 3.9, *Hydrology and Water Quality*. The effects of construction and operation of the proposed Project related to stormwater runoff and surface water and groundwater quality are thoroughly disclosed and discussed under Impact HYD-1 and Impact HYD-3 in Section 3.9, *Hydrology and Water Quality*. As described therein, construction activities have the potential to contribute to polluted stormwater runoff due to the major earthwork, which would disturb the underlying soils and expose them to potential erosion and mobilization, as well as from delivery, handling, and storage of construction materials and wastes, as well as potential leakage and spills of construction materials (e.g., oil, grease, paints, solvents, or cleaning agents). During storm events, these contaminants on the Project site have the potential to be washed away by stormwater runoff and carried into the existing storm drain system. Potential adverse effects on water quality associated with construction activities would be reduced through compliance with the requirements of the Construction General Permit (State Water Resources Control Board [SWRCB] Order No. 2009-0006-Data Quality Assessment). Prior to beginning any demolition, grading, or construction activities, BCHD must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent (NOI) and a Stormwater Pollution Prevention Plan (SWPPP) for review and approval by the Los Angeles RWQCB. In accordance with the Stormwater Management and Discharge Control Ordinance, the best management practices (BMPs) developed for the proposed Project would also be incorporated into a Standard Urban Storm Water Mitigation Plan (SUSMP) to be approved by the Redondo Beach Department of Public Works (DPW) Engineering Services Division and Torrance Public Works for the construction activities occurring within the City of Torrance right-of-way. The SUSMP would require that BMPs minimize pollutants and reduce stormwater runoff to levels that comply with applicable water quality standards. Implementation of BMPs developed in accordance with the

requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of the proposed Project. Therefore, construction-related impacts to water quality would be less than significant.

With regard to operational impacts to water quality, the overall net reduction in impervious surface areas associated with the proposed Project compared to existing conditions would reduce the potential for pollutants (e.g., leaking oil, gas, grease, metals, organics, pesticides, and non-chemical pollutants such as trash, debris, and bacteria) to be discharged during storm events. Additionally, Phase 1 of the proposed Project would involve the construction of an infiltration 85th system designed to retain, treat, and infiltrate the 85th percentile storm. Any flows larger than the 85th percentile design storm would be conveyed to North Prospect Avenue. The proposed Project would be subject to Federal, State, and local regulations pertaining to operational water quality, including the Redondo Beach Stormwater Management and Discharge Control Ordinance. Therefore, BCHD would be required to prepare and implement a SUSMP through the operational life of the proposed Project. Prior to issuing approval for final occupancy, BCHD would be required to provide an operation and maintenance plan, monitoring plan, where required by the Los Angeles Basin Plan, and verification of ongoing maintenance provisions for LID practices, Treatment Control BMPs, and Hydromodification Control BMPs including but not limited to: final map conditions, legal agreements, covenants, conditions or restrictions, and/or other legally binding maintenance agreements. Verification at a minimum shall include a BCHD-signed statement accepting responsibility for maintenance until the responsibility is legally transferred.

Therefore, following completion of the proposed Project, stormwater runoff from the Project site would not directly affect water quality in the Santa Monica Bay or local groundwater. Compliance with all applicable State and local regulations would ensure that operational impacts to water quality would be less than significant.

Comment JD2-7

The comment again questions why trace amounts of PCE was detected in soil boring B-2. Refer to Comment Response JD2-4.

Comment JD2-8

The comment claims that the EIR does not “investigate the effect on the ocean and water ways in the region.” Refer to the response to Comment Response JD2-6.

Comment JD2-9

The comment misrepresents the exhaustive quantitative analysis in the construction HRA by stating that the EIR fails to consider the human health risks of students at Towers Elementary School. As described in Section 3.2.3, *Impact Assessment and Methodology*, the dispersion modeling was conducted to estimate ground-level diesel particulate matter (DPM) concentrations for the point of maximum impact (PMI) and for the maximum exposed individual resident (MEIR). The PMI is the location where the cancer risk or non-cancer chronic health effect is maximum, regardless of the presence of a human receptor at that location. No concentration higher than the PMI would occur from the proposed construction activities. As described in detail within the EIR and the construction HRA, with the implementation of all required mitigation measures – including the use of USEPA Tier 4 engines on all construction equipment – impacts at the PMI and MEIR would be less than significant when compared to the SCAQMD thresholds. Because the four schools are located at a much greater distance than the PMI and MEIR, they would experience less exposure and impacts would be similarly less than significant when compared to the SCAQMD thresholds. Refer to Master Response 10 – Air Quality Analysis.

Comment JD2-10

The comment again misconstrues the EIR, by stating that the EIR does not adequately assess human health impacts from Project construction given that the HRA and incorrectly states that PM₁₀ is used to replace PM_{2.5} exposures. As described in Section 3.2.3, *Impact Assessment and Methodology*, the HRA was conducted in accordance with SCAQMD and OEHHA guidance. As described in the EIR and the construction HRA, OEHHA guidance specifically indicates that PM₁₀ to be used as a surrogate for the DPM when evaluating health risks.

It is important to note that PM_{2.5} is a subset of PM₁₀. Therefore, the analysis of PM₁₀ emissions provided in the EIR and the associated construction HRA, which was prepared in accordance with OEHHA methodology, inherently does include an analysis of all particulate matter smaller than 10 microns.

Comment JD2-11

The comment expresses general concerns regarding diesel truck emissions associated with the proposed Project, particularly the effects on students at the schools in the Project vicinity. Refer to Comment Response JD-9. Again, the construction HRA very strictly follows SCAQMD and OEHHA guidance and conservatively analyzes the dominate pollutant (i.e., DPM) that would be emitted in closest proximity to the receptors.

Comment JD2-12

The comment provides an overview of potential health impacts associated with DPM, with references to various articles on the subject. However, as described in the individual responses to Comment JD2-8 through JD2-11, the construction-related DPM emissions were quantified in accordance with SCAQMD and OEHHA guidance, appropriately compared against SCAQMD thresholds, and found to be less than significant. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to this issue.

Comment JD2-13

The comment asserts that a three-dimensional airborne noise analysis should be conducted to completely assess the impact of Project generated noise on the residents surrounding the Project site. The comment implies that the noise analysis conducted for the proposed Project as presented in Section 3.11, *Noise* included hand calculations and rough estimates with spreadsheets containing endless tables of data. However, construction noise levels at on- and off-site locations were estimated using the FHWA Roadway Construction Noise Model where inputs included distance from construction equipment to receptor, equipment types, and usage factor, which is presented as a percentage of the equipment operating at full power within a given time frame. This is a standard practice for noise modeling within the City of Redondo Beach. Neither of the City of Redondo Beach nor the City of Torrance have prepared recent CEQA documentation that use SoundPLAN to analyze construction noise. CEQA Guidelines Section 15204 clearly states: “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.*” Refer to Master Response 12 – Noise Analysis for detailed discussion and a response to comments pertaining to the quantitative noise modeling, assumptions, and results.

Comment JD2-14

The comment states that the EIR should thoroughly investigate the propagation and impact of airborne and ground-transmitted noise from the proposed Project during excavation and construction on the surrounding community and investigate the impact of airborne noise generated by the completed Project on the surrounding community. The EIR thoroughly discloses and discusses the potential airborne and groundborne noise impacts associated with construction and operation of the proposed Project. The exhaustive noise modeling effort – which resulted in the identification of a significant and unavoidable temporary, but prolonged construction-related noise impact – clearly meets the standard of adequacy set out in CEQA Guidelines Section 15151, which states “*...an EIR should be prepared with a sufficient degree of analysis to provide decision*

makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure” (San Francisco Ecology Center v. City and County of San Francisco, (1975) 48 Cal. App. 3d 584).

Letter JHRC

March 24, 2021
Josephine Hrzina & Richard Crisa

Comment JHRC-1

The comment expresses opposition to the Project due to the duration of construction, air emissions, construction-related noise, and construction traffic. These construction-related impacts are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JV

June 9, 2021
Josey Vanderpas

Comment JV-1

The comment provides a general statement of opposition to the proposed Project. The comment claims, without substantial evidence, that the noise associated with the proposed Project would result in an increase in tinnitus for residents, creating unbearable discomfort resulting in anxiety.

Again, the comment fails to provide substantial evidence or expert opinion that provides a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR.

Comment JV-2

The comment expresses general concerns, without substantial evidence or expert opinion, regarding health impacts associated with dust emissions and release of hazardous materials resulting during Project construction. The comment fails to acknowledge the exhausting modeling effort of criteria air pollutant and toxic air contaminant (TAC) emissions associated with the proposed Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to particulate matter emissions as well as other criteria air pollutant emissions and TACs. As described therein impacts associated with temporary, but prolonged construction-related impacts are addressed in Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of Mitigation Measure (MM) AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD’s mass daily significance thresholds for operation.

Similarly, the comment does not acknowledge the robust sampling effort and analysis of hazardous materials on-site provided in Section 3.8, *Hazards and Hazardous Materials*. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and responses to comments on this issue.

It should also be clarified that the construction associated with Phase 1 would occur over approximately 29 months and construction associated with Phase 2, which would occur over approximately 28 months, would not begin until 2029, approximately 5 years after the completion of Phase 1.

Letter JS3

May 27, 2021
Joyce and John Stauffer
19411 Linda Drive
Torrance, CA 90503

Comment JS3-1

This comment asserts that the development associated with the proposed implementation of the Healthy Living Campus Master Plan would be wholly incompatible with the surrounding neighborhood and disruptive for the location. The comment asserts that completed construction is 300 percent larger than what currently exists, but provides no methodology for how that conclusion has been reached. As described in Table 1-2 the existing campus has a total occupied building area of 260,400 square feet (sf). Under the proposed Project, the total occupied building area would be 484,900, representing an increase of approximately 86 percent. Additionally, the existing Beach Cities Health Center reaches a maximum height of 5 stories. Under the proposed Project the proposed Residential Care for the Elderly (RCFE) Building would reach a maximum height of 7 stories. Importantly, as described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, it should also be noted that the height of the proposed RCFE Building was adjusted from a maximum of 4 stories to a maximum of 7 stories in order to avoid locating portions of the building along the eastern boundary of the campus. This revision represents an effort to: 1) concentrate the majority of the building mass along Beryl Street, with a setback and step-down in building height provided by the Redondo Village Shopping Center; and 2) address construction-related concerns associated with the adjacency of the proposed RCFE Building to the residential neighborhood within the City of Torrance.

The comment states that the RCFE Building would be the tallest building in all three of the beach cities and would be highly visible given that the campus is located approximately 30 feet above street level. This issue is identified (refer to Table 3.1-1) and fully addressed under Impact VIS-1, which identifies a potentially significant impact to scenic views of the Palos Verdes ridgeline from Flagler Lane & 190th Street. For issues related to building height and visual character refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

The comment also asserts that the proposed RCFE Building constructed during Phase 1 and the proposed parking structure construction during Phase 2 would reduce sunlight, cast long shadows, and impact the privacy of homes in all directions. However, the comment does not challenge any specific aspect of the analysis provided in Section 3.1, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support its assertions. These issues are thoroughly discussed in Master Response 9 – Aesthetics and Visual Resources Analysis.

Comment JS3-2

The comment correctly summarizes the analysis of potential noise impacts provided in Section 3.11, *Noise* of the EIR. This comment has been received and incorporated into the Final EIR as a

part of the responses to comments, and this information – as with all of the information presented in the EIR – will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

Comment JS3-3

The comment asserts that increased traffic, congestion, and safety issues would overwhelm neighborhood streets and impact nearby schools, including West High School and Towers Elementary. Additionally, the comment asserts, without substantiating evidence or expert opinion, that all major surrounding thoroughfares and intersections in the City of Redondo Beach and the City Torrance will be impacted. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to issues related to the duration and timing of construction-related traffic, impacts to safety, and coordination with Torrance Unified School District (TUSD) regarding the construction schedule.

Comment JS3-4

The comment incorrectly claims that the proposed Project would expose thousands to hazardous volatile organic compounds (VOCs) and other carcinogens. The comment notes the Project site's location relative to public schools and the detection of tetrachloroethylene (PCE) on-site. The EIR thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). While the comment correctly states that the proposed Project would disturb soils contaminated with PCE, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Therefore, with the implementation of the mitigation measures identified in the EIR (i.e., MM HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant. Additionally, the air quality analysis provided in the EIR is supported by a Health Risk Assessment (HRA), which determined that with the implementation of the mitigation measures identified in the EIR (i.e., MM AQ-1, which includes a requirement for U.S. Environmental Protection Agency [USEPA] Tier 4 engines), cancer risk and non-cancer health effects would remain below the thresholds established by the South Coast Air Quality Management District (SCAQMD) (refer to Section 3.2, *Air Quality* and Appendix B). Refer to

Master Response 10 – Air Quality Analysis and Master Response 11 – Hazards and Hazardous Materials for further discussion and response to these issues.

The comment also notes noise and vibration during construction, but does not challenge any specific aspects of the quantitative noise and vibration modeling provided in Section 3.11, *Noise*, which shows that these schools would not experience noise levels exceeding the established thresholds. Further, the comment does not provide any substantiating evidence supporting its assertions. Refer to Master Response 13 – Noise Analysis for further discussion and response to these issues.

Comment JS3-5

The comment incorrectly states the proposed development would be incompatible with the zoning designation of P-CF (Community Facility). The P designation is comprised of lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. The specific purposes of the P Public and Institutional zone regulations are to provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to Beach Cities residents. Implementation of the proposed Project would not substantially alter these land uses. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to this issue.

Comment JS3-6

The comment incorrectly states that under the proposed Project, BCHD would gift public land to private developers and criticizes BCHD’s use of taxpayer funds and financial operations. It should be noted that the proposed Project would not gift public land to private developers, rather the BCHD would use revenues generated from the proposed Project to re-invest in and continue community health and wellness programming and services in alignment with the mission of BCHD. As described in Section 2.3, *Existing Tenants* BCHD currently uses a similar revenue generation model providing leased space for a variety of mission-oriented tenants. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to this issue.

Comment JS3-7

The comment incorrectly states that 80 percent of the target renters are from outside the Beach Cities and only 9 percent of target renters live in Redondo Beach. The market feasibility study prepared by MDS Research Company, Inc. found that approximately 70 percent of residents of the proposed senior housing units would come from the Primary Market Area within a 5-mile radius of the Project site. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to this issue.

Comment JS3-8

The comment asserts that implementation of the proposed Project would adversely affect local fire departments capability of responding to calls for service. The EIR includes a thorough assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local fire protection services. As described in Section 3.13, *Public Services* under Impact PS-1, implementation of the proposed Project would incrementally increase the demand for the Redondo Beach Fire Department fire protection and Emergency Medical Services (EMS) services as well as other non-emergency services. Assuming an average of 0.82 annual calls per bed space per year based on the average number of service calls to the existing Beach Cities Health Center, the BCHD campus would generate an estimated total of 244 emergency calls per year following the completion of the proposed development under Phase 1. This would represent an increase in total calls by a factor of approximately 2.5 when compared to the average of 98 calls per year under existing conditions. As described under Impact PS-1 this increase would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, this impact would be less than significant.

Comment JS3-9

The comment criticizes BCHD's financial operations. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to this issue as it relates to the proposed Project.

Comment JS3-10

The comment states that the South Bay Hospital was exclusively created for use by the Beach Cities. This comment does not deal with any of the technical sufficiency of the EIR or any of the physical environmental impacts identified therein. Nevertheless, this comment has been received

and incorporated into the Final EIR as a part of the responses to comments, and will be considered by the decision makers during deliberation on the proposed Healthy Living Campus Master Plan.

Comment JS3-11

The comment express disapproval of BCHD's role as the lead agency and implies that BCHD should seek a public vote for a bond to finance a seismic retrofit of the building. For issues related to BCHD's role as lead agency, refer to Master Response 2 – BCHD as Lead Agency. It should also be noted that the EIR does consider Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space), which contemplates placing a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. If successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. However, the success of a local bond measure is speculative, particularly given the history of recent bond measure initiatives in the South Bay.

Comment JS3-12

The comment states that Phase 2 development program is currently funded. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to financial issues associated with the proposed Project.

Comment JS3-13

The comment asserts that BCHD is not under legal obligation to retrofit the Beach Cities Health Center. BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from community health and wellness services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to this issue.

Letter JC

June 6, 2021
Joyce Choi

Comment JC-1

The comment expresses general opposition to the proposed Project, the Environmental Impact Report (EIR), and the timing of the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment goes on to express general concerns regarding air and dust emissions, construction-related noise, and construction traffic. These issues are discussed in detail within Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project. Refer to Master Response 12 – Noise Analysis for a detailed discussion of the potential impacts associated with construction-related noise. Refer to Master Response 13 – Transportation Analysis for a detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project. It should also be noted that the analysis of construction-related air quality emissions, noise levels, and traffic included consideration of construction worker vehicles.

Letter JB2

June 10, 2021
Judith Bunch

Comment JB2-1

The comment asserts that cost of the proposed assisted living facility would not be affordable to local residents. Refer to Master Response 5- Affordability of RCFE Assisted Living and Memory Care Units. Additionally, the comment asserts that BCHD has not listened to public input. As described Section 1.6, *Project Background*, since the inception of the proposed Project in 2017, BCHD has been dedicated to engaging in public outreach, including forming a 20-person Community Working Group (CWG) to represent the various populations and organizations in the Beach Cities and engage local participants in the planning of Project redevelopment. The proposed Project was developed as a result of more than 60 meetings hosted over a 3-year period and attended by more than 550 community members.

Comment JB2-2

The comment claims various environmental topic areas – including aesthetics, air emissions, noise, recreation, and traffic – would experience significant impacts under the proposed Project. It should be noted that, as analyzed in the EIR, impacts to aesthetics, air quality, and transportation were either determined to be less than significant, or less than significant with mitigation. A detailed discussion and responses to comments pertaining to aesthetics and visual resources impacts resulting from construction and operation of the proposed Project are provided in Master Response 9 – Aesthetics and Visual Resources Analysis. Impacts associated with air pollutant emissions from construction and operation of the proposed Project are detailed in Master Response 10 – Air Quality Analysis. Noise impacts of both construction and operation of the proposed Project are detailed further in Master Response 12 – Noise Analysis. The impacts associated with vehicle trips, mobility, and transportation safety from construction and operation of the proposed Project are detailed in Master Response 13 – Transportation Analysis. As described in Section 4.5, *Effects Found Not to Be Significant*, because the proposed Project would expand open space and recreational facilities, the proposed Project may substitute the demand for the City’s already substantial recreational facilities (e.g., parks, beaches, open space, etc.). Because the proposed Project would not substantially increase demand on recreational facilities, potential impacts to recreational resources would be considered less than significant. The comment does not challenge this analysis or provide any substantiating evidence to further support its assertions.

Further, the comment also claims that the EIR is defective but does not identify specific grievances with the EIR or impact analysis, mitigation measures, and alternatives that may not have been sufficiently assessed.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter JS4

June 9, 2021
Judith Scott
19510 Linda Drive
Torrance, CA 90503

Comment JS4-1

The comment asserts that the Draft EIR is “deficient in numerous ways” but fails to identify any specific shortcomings of the EIR. The comment goes on to assert that the proposed Project is based on outdated (pre-COVID-19) assumptions about the profitability of an Assisted Living facility and claims that the implementation of the proposed Project would risk the financial assurance for existing community health and wellness programs and services. For a detailed discussion and response to comments pertaining to these issues refer to Master Response 3 – Project Need and Benefit, Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, and Master Response 6 – Financial Feasibility/Assurance.

Comment JS4-2

The comment asserts, without substantial evidence, that the proposed Project would affect surrounding neighborhood communities with purported impacts on aesthetics as well as construction-related air emissions, noise, and traffic. However, the comment does not challenge any specific aspects of the analysis of aesthetics and visual resources in Section 3.1, *Aesthetics and Visual Resources*, which is supported by supported by more than a dozen photographs as well as detailed computer-generated photosimulations and a shade and shadow study prepared by licensed architects. Similarly, the comment does not challenge any specific aspects of the analysis of construction-related impacts provided in Section 3.2, *Air Quality*, Section 3.11, *Noise*, or Section 3.14, *Transportation*, each of which were supported by exhaustive quantitative modeling by recognized experts in their field. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis, Master Response 10 – Air Quality Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion of the potential Project for a detailed discussion and response to comments pertaining to these issues.

The comment goes on to claim that the EIR requires redrafting to take adequate account of the extensive community concerns. Section 1.6, *Project Background* provides a brief summary of the competing community concerns that were considered during the development of the proposed Healthy Living Campus Master Plan and summarizes the 17 Community Working Group (CWG) meetings to discuss various components of the proposed Healthy Living Campus Master Plan before it was eventually dissolved in December 2020 following the conclusion of the preliminary planning and design phases. BCHD staff also conducted public outreach for the Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan. The claim that the EIR does not consider the extensive community concerns is

unfounded. No substantial evidence has been provided to suggest that any of the triggers for recirculation described under CEQA Guidelines 15088.5 have been met.

Letter JK

June 2, 2021
Judy Kamp

Comment JK-1

The comment expresses general opposition to the proposed Project and claims that the proposed Project is unnecessary and a waste of taxpayer money. Refer to Master Response 1 – General Opposition as well as Master Response 3 – Project Needs and Benefits for a detailed discussion and response to comments pertaining to these issues.

The comment also asserts, without substantial evidence or expert opinion, that the proposed Project would cause physical harm to people living in the surrounding area as well as traffic congestion. However, the comment does not provide any specifics or details to further clarify these issues. Potential impacts to transportation are described in detail in Section 3.14, *Transportation*, with analysis supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation.

Letter JD3

April 13, 202
Julie Dominguez

Comment JD3-1

The comment expresses general opposition to the proposed Project and claims, without substantial evidence, that the proposed Project is too big for the surrounding neighborhood. Refer to Master Response 1 – General Opposition. Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to commenters pertaining to compatibility with the surrounding area.

Comment JD3-2

The comment general expresses general concern regarding traffic and air emissions associated with the proposed Project, but does not challenge any specific aspects of the analysis of transportation impacts presented in Section 3.14, *Transportation* or the analysis of air quality

impacts to sensitive receptors in Section 3.2, *Air Quality*. Refer to Master Response 13 – Transportation Analysis for detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project. Refer to Master Response 10 – Air Quality Analysis for detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project.

Comment JD3-3

The comment asserts that the proposed Project would not provide any benefits to the residents of the neighborhoods surrounding the Project site. Refer to Master Response 3 – Project Needs and Benefits.

Letter KY1

June 10, 2021
Kenneth Yano

Comment KY1-1

The comment claims the BCHD has failed to demonstrate that the proposed Project would meet the first project objective: “Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support current levels of programs and services.” The comment then asserts that BCHD should release a detailed financial assessment verifying the proposed Project would meet revenue objectives before the EIR is approved. The comment goes on to provide its own assessment as to why the proposed Project would not meet revenue goals and therefore, must be dismissed. As further detailed in Master Response 6 – Financial Feasibility/Assurance, BCHD has very clearly and consistently demonstrated that the funding necessary to implement the proposed Phase 1 preliminary site development plan, which is anticipated to cost \$235 million, is secured. These funds consist of revenue generated by property assessments, BCHD’s health and fitness facilities, and tenant space within the Beach Cities Health Center, as well as leases, partnerships, grants. While funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the RCFE Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory Care community as well as the PACE within the RCFE Building. In addition, BCHD would continue to be able to seek and secure

appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

Further, while the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a “*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to do so if the information “*...does not supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). CEQA Guidelines Section 15131, also specifically states “*[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*” As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR.

Comment KY1-2

The comment questions if PM2.5 emissions at the Project-site and surrounding community would be monitored during construction and asserts Sunnyglenn Park, Dominguez Park, and Towers Elementary School must be monitored due to safety concerns. The comment then questions responsive action and remediation that would be taken if excess levels of PM2.5 are generated during construction. The comment also questions if the public would be able to monitor emissions real-time through the internet.

It should be noted that the analysis of localized construction emissions under Impact AQ-2 describes that nearby resident as well as people using the recreational facilities located near the Project site, particularly the elderly and children, could experience adverse health effects if concentrations of criteria pollutants exceed applicable localized significance thresholds. However, as shown in Table 3.2-7 in Section 3.2, *Air Quality*, implementation of MM AQ-1 would reduce on-site construction emissions for PM10 and PM2.5 below the SCAQMD LSTs, with associated avoidance of potential impacts to human health.

CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “*...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].*” An MMRP

has been provided in Section 9.0, Mitigation Monitoring and Reporting Program and implementation responsibilities, monitoring, and reporting actions are identified in Table 9-1. Noncompliance with an adopted MMRP could result in stop work order. Other civil and administrative remedies such as fees, financial assurances such as instrument of credit or performance bonds, injunctive relief, revocation of permit or abatement of a nuisance could also be implemented if a stop work order is not observed, or not sufficient by itself.

Comment KYI-3

The comment states the description of shade impacts provided in the EIR is vague and qualitative and questions conclusions and questions if contour shade maps are provided for February 4th, March 21st, May 6th, June 21st, and December 21st. Summer solstice takes place between June 20 and 22 each year and is represented in Figure 3.1-5. December 21st coincides with the 2021 winter solstice and is represented in Figure 3.1-7. The shade and shadow effects consider shade and shadow effects between late October and early April and between early April and late October. Thresholds of significance may be defined either as quantitative or qualitative standards, or sets of criteria, whichever is most applicable to each specific type of environmental impact. For example, quantitative criteria are often applied to air quality and noise impacts, while aesthetics impacts are typically evaluated using qualitative thresholds. The comment also inquires if a frame outlining the proposed building would be provided. The EIR analysis of impacts to aesthetics and visual resources is informed by detailed photosimulations and models prepared by VIZf/x, an expert consultant specializing in the creation and visualization of design simulations and the analysis of visual resource impacts, for the Phase 1 preliminary site development plan. Photosimulations are often employed in the analysis of visual impacts in place of silhouettes, poles, or flag banners as they can provide an equally or more informative analysis than when utilizing silhouettes, poles, or flag banners.

Comment KYI-4

The comment inquires how on-site noise monitoring would be conducted and if real-time, off-site noise monitoring would be conducted as well. The comment inquires how noise complaints would be received and responded to in a timely manner. The comment also inquires about noise levels specific to machinery, noise impacts to on-site sensitive receptors (i.e., Silverado Memory Care residents), and mitigation

Construction equipment that may be used at the Project site and maximum noise levels at 50 feet is provided in Table 3.11-15. The EIR includes detailed discussion of the potential impacts and mitigation of construction-related noise and vibration both on- and off-site under *Impact*

Description (NOI-1) and *Impact Description (NOI-2)* in Section 3.11.5, *Project Impacts and Mitigation Measures*. This analysis includes detailed estimates of Project construction noise levels and their impact on various sensitive receptors. The full list of noise-sensitive land uses considered in the analysis of noise impacts is presented in Table 3.11-16 and includes residences near the Project site, Towers Elementary School, and health center, memory care, and childcare facilities located onsite at Building 514. As presented therein, the proposed construction activities during both Phase 1 and Phase 2 would have significant impacts to noise-sensitive receptors for the duration of the construction phases, because the projected L_{eq} would exceed the *Residential* criteria. To reduce the impacts of excessive construction noise on surrounding land uses, MM NOI-1 is identified. This measure would require the implementation of a Construction Noise Management Plan that requires:

- Limitations on the hours of construction activities;
- Installation of noise barriers;
- Implementation of noise best management practices and active noise suppression features, such as muffling of equipment, use of electric power tools, and staging of equipment away from on-site and off-site sensitive uses;
- Use of designated haul routes;
- Distribution of notices prior to initiation of construction activities; and
- Frequent monitoring of noise and vibration resulting from construction to ensure implementation of all noise attenuation measures.

As discussed under Impact NOI-1 implementation of this mitigation measures, as well as required compliance with the Redondo Beach and Torrance Noise Regulations (Redondo Beach Municipal Code [RBMC] Sections 4-24.5-3 and 9-1.12 and Torrance Municipal Code [TMC] Section 6-46.31) would reduce construction noise impacts; however, feasible noise barrier heights and locations would not reduce noise levels below the FTA's residential criterion and impacts are considered significant and unavoidable. However, expected noise levels would not exceed the eight-hour 90 dBA limit identified by OSHA and the California Division of Safety and Health for defining when impacts on human health would occur. Impacts from generation of vibration on noise-sensitive receptors located along Beryl Street, Del Amo Boulevard, North Prospect Avenue, and 190th Street would be less than significant according to FTA and based on approved methodologies for analysis of noise vibration and ground-borne vibration. Nevertheless, MM NOI-2 is proposed to further reduce noise levels from heavy haul trucks during construction.

As described in Section 9.0, *Mitigation Monitoring and Reporting Program*, during construction, BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues.

Comment KYI-5

The comment raises concerns regarding construction-traffic at Towers Elementary during drop-off and pick-up hours and safety concerns related to vehicle pedestrian conflicts. BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes. TUSD also requested during the public comment period MM NOI-1 (Construction Noise Management Plan) to be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School, in order to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts. This request will require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1st grade and 5th grade), and are not the same at the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

Further, construction and operational traffic under the proposed Project is described in Section 3.12, *Transportation* and summarized in Master Response 13 – Transportation Analysis. Implementation of the Construction Traffic and Access Management Plan under MM T-2 would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction

management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible.

Comment KYI-6

The comment incorrectly states perchloroethane was found on the Project site. The comment may be referring to tetrachloroethylene (PCE), which was detected on site and is sometimes referred to as Perchloroethene. The comment questions what monitoring and pollutant prevention strategies would be enforced for perchloroethane (assumed to be referring to PCE) and hydrocarbon pollutants. The comment raises specific concern related to PCE emissions, truck trips, use of tarps, and transportation of hazardous materials. As described in the EIR, Total Petroleum Hydrocarbons (TPH) in the heavy oil range was detected in two samples at boring location on-site however, they were well below the DTSC and USEPA residential screening level and do not represent a potential hazard to the environment or public health.

As summarized in Master Response 11 – Hazards and hazardous Materials, the implementation of MM HAZ-2a through HAZ-2d would ensure VOC compounds (including PCE) and contaminated soils are properly detected, removed, and handled during ground disturbing activities associated with the proposed Project. Specifically, regarding trucks, tarps, and transportation, under the Soils Management Plan required under MM HAZ-2a:

Decontamination Methods and Procedures

Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the on- and off-site distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas.

Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out.

Truck Loading

Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed, and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following:

- Materials shall be transported to an approved treatment/disposal facility.
- No excavated material shall extend above the sides or rear of the truck/trailer.
- Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.

The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material off-site

Transportation Plan

All affected soils shall be transported off-site for lawful management and disposal. Prior to load-out, the construction contractor shall prepare waste profiles for the receiving facility using analytical data from the previous environmental site assessment.

Comment KYI-7

The comment reiterates concerns regarding a lack of financial assessment of Project cost and anticipated revenue. The comment states financial assessment must be considered in relation to project objectives, and if the Project cannot meet objectives, it must be discarded. See Comment KY-1 above.

Comment KYI-8

The comment criticizes the financial analysis prepared by Cain Brothers for the proposed Project for not including depreciation and provides a reproduced calculation of profits with depreciation effects included and expresses concern that the proposed Project would not generate the income predicted under the Bain Brothers analysis. These comments are not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Concerns regarding the economic and financial success of the proposed Project are not directly associated with the “*physical impacts on the environment.*” As such, these comments, while relevant to BCHD Board of Directors decision-making, do not fall within the scope of CEQA and do not require detailed discussion or analysis within this EIR. Refer to Comment Response – Financial Feasibility/Assurance for further discussion.

Comment KY1-9

The comment states the financial analysis prepared by Cain Brothers is flawed because it assumes full income at the third year of operation and states full income cannot reasonably be achieved until after five years of operation. The comment provides a figure demonstrating 10-year projected incomes with this recalculation. Refer to the response to Comment KY1-8.

Comment KY1-11

The comment criticizes the financial analysis prepared by Cain Brothers for not considering loan payments and provides a figure demonstrating a 10-year projection of loan payoff during construction and a 10-year projection if loan payments are deferred until the fourth year of operation. Refer to the response to Comment KY1-8.

Comment KY1-12

The comment criticizes the financial analysis prepared by Cain Brothers for a lack of contingency for cost overruns and schedule slippages. Refer to the response to Comment KY1-8.

Comment KY1-13

The comment reiterates statements that the financial analysis prepared by Cain Brothers is flawed and the proposed Project would not be financially successful. See Comment KY1-8 above. The comment then speculates that Sunrise Hermosa Beach was not profitable prior to BCHD partial ownership. The comment again expresses concern over the lack of a financial plan. The comment is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Comment KY1-14

The comment expresses doubt that because BCHD has not presented a plan projecting the financial success of the Project, it can be reasonably claimed that the proposed Project would meet the project pillar to “Leverage the campus to expand community health services” Refer to Comment KY-1.

Comment KY1-15

The comment questions the affordability of the proposed assisted living units and asserts the majority of Redondo Beach residents would not qualify. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to concerns regarding the cost of proposed services.

Letter KA

June 8, 2021
Kevin Ajamian

Comment KA-1

The comment claims, without substantial evidence or expert proposed Project would exacerbate these traffic issues. However, the comment does not challenge any specific aspects of the analysis of transportation impacts presented in Section 3.14, *Transportation*, which is supported by transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to construction and operational transportation impacts.

Comment KA-2

The comment asserts, without substantial evidence, that the proposed construction activities would make it unsafe for children walking on the surrounding streets, particularly for children walking to Dominguez Park and Towers Elementary School. The Environmental Impact Report (EIR) clearly identifies the potential impacts related to temporary, but prolonged construction-traffic impacts in Section 3.14, *Transportation* under Impact T-2. The EIR acknowledges construction activities and potential conflicts between vehicles, bicycles, and pedestrians in the vicinity of the Project site would be potentially significant. To avoid construction-related safety hazards, implementation of Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for activities occurring with the right-of-way within the City of Torrance right-of-way along Flagler Lane and Flagler Alley. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbook*. The Construction Traffic and Access Management Plan would also specifically require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. With the implementation of MM T-2, construction-related hazards would be reduced to a less than significant level.

Comment KA-3

The comment expresses general concerns regarding air emissions associated with the proposed Project. However, the comment does not challenge any specific aspects of the analysis of air quality impacts to sensitive receptors in Section 3.2, *Air Quality*. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion of the potential air quality impacts to sensitive receptors associated with the proposed Project.

Comment KA-4

The comment calls on Redondo Beach City Council members to oppose the Project. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment KA-5

The comment asserts that residents do not want to trade tax dollars in exchange for safety and a clean environment. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter KY2

June 6, 2021
Kyung Yoon

Comment KY2-1

The comment expresses opposition to the proposed Project, particularly the proposed Assisted Living facility. Refer to Master Response 1 – General Opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment claims, without specifics or further details, that the EIR is geared and biased to approve the proposed Project. This comment is unsubstantiated and unfounded. The comment also incorrectly asserts that it is not possible to mitigate noise, dust, and pollution to acceptable levels at residential sensitive receptors in the vicinity of the project site. As described in Section 3.11, *Noise* under Impact NOI-1, construction noise levels would result in significant and unavoidable noise impacts to sensitive receptors. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. However, as described in Master Response 10 – Air Quality Analysis, impacts related to dust and other criteria pollutant emissions would be less than significant with mitigation. The construction emissions associated with Phase 1 and Phase 2 of the proposed Project were estimated using the South Coast Air Quality Management District’s (SCAQMD’s) California Emissions Estimator Model (CalEEMod), as prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area.

Comment KY2-2

The comment asserts that the children attending Towers Elementary School throughout the duration of the proposed construction would be exposed to everything disclosed in the EIR as well as other unknowns. The comment provides no specific or further details to clarify these assertions or define these unknowns. It should be noted that the EIR has found, based on the results of various technical studies and exhaustive quantitative modeling efforts prepared by experts in their field, the proposed Project would not result in any significant and unavoidable impacts to Towers Elementary School.

Comment KY2-3

The comment makes speculative and unsubstantiated claims regarding the construction schedule that has been described for the proposed Project. As previously described, construction associated with Phase 1 would occur over approximately 29 months and construction associated with Phase 2 would occur over approximately 28 months. These estimates were developed with significant input from construction managers/schedulers at CBRE and were supported by a robust Construction Management Plan describing construction activities, sequencing, and heavy equipment requirements. Pursuant to California Environmental Quality Act (CEQA) Guidelines 15003, the description of construction activities clearly makes a “...a good-faith effort at full disclosure” and is based on detailed construction scheduling information provided by a well-renowned construction management firm with decades of experience managing projects far more complex than the proposed redevelopment of the BCHD campus.

Comment KY2-4

The comment asserts, without substantial evidence, that the proposed Project would visually degrade the surrounding neighborhood and expresses general concerns regarding the compatibility of the proposed Project with the surrounding area. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue. The comment also recommends demolishing the existing structures on-site and replacing them with a park. As described in Section 5.0, *Alternatives, Alternative 1 – No Project Alternative* (Demolish and Replace with Limited Open Space) describes the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building. Following the completion of demolition activities, the footprint of the existing buildings would be graded and redeveloped with landscaped turf and limited hardscaping. Given the funding limitations associated with the No Project Alternative and the need for BCHD to minimize costs associated with future maintenance activities, no restrooms or other park-like facilities (e.g., slides, recreational fields, etc.) would be constructed under the No Project Alternative and this area of the Project site would be used as a passive open space. Implementation of the No Project Alternative would only achieve one of the Project Objectives (Project Objective 1).

Letter LM

April 9, 202
L Mooney

Comment LM-1

The comment expresses, without substantial evidence, general concerns regarding the size and height of the Project as well as the compatibility with the surrounding residential neighborhood. However, the comment does not challenge any specific aspects of the analysis of aesthetics and visual resources in Section 3.1, *Aesthetics and Visual Resources*, which is supported by supported by more than a dozen photographs as well as detailed computer-generated photosimulations and a shade and shadow study prepared by licensed architects. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding building height and visual character.

Comment LM-2

The comment asserts that the proposed Project does not align with the mission of the Beach Cities Health District (BCHD) and recommends alternative locations for the proposed Project, such as the Galleria Mall, a business park, or another busy area. Refer to Master Response 3 – Project

Need and Benefit as well as Master Response 4 – Project Objectives for detailed discussion of the relationship between BCHD’s mission and the proposed Project. As described in Section 2.4.1, *BCHD Mission*, BCHD is a California Healthcare District focused on serving the Beach Cities, including more than 123,000 people within Redondo Beach, Hermosa Beach, and Manhattan Beach as well as tens of thousands within other South Bay communities. As described in Section 2.2.6, *Existing BCHD Programs*, BCHD offers a range of evidence-based health and wellness programs to promote health and well-being across the entire lifespan of its service population. Its mission is to enhance community health through partnerships, programs, and services. The proposed Project was conceived to resolve the economic hardship and potential safety hazards posed by the aging facilities on-campus, while also allowing BCHD to continue with its mission to provide health and wellness services to its service population within the Beach Cities and the nearby South Bay communities. In addition to addressing ongoing maintenance issues and basic public safety issues associated with potentially seismically unsafe aging buildings, these project objectives address key economic drivers that would support BCHD’s programmatic needs for facilities that can accommodate the innovative and constantly evolving programs necessary to serve the future needs of the community. BCHD’s continued role as a leading-edge community health care provider requires flexible, multi-use spaces (e.g., meeting rooms and functional open space for workshops, training sessions, and events) as well as specialized use spaces (e.g., Center for Health and Fitness, Demonstration Kitchen, Blue Zones café) driven by emerging health service practices and technologies.

Regarding potential alternative locations for the proposed Project, Section 5.4, *Alternatives Considered but Rejected from Further Analysis* explores the requirements for alternate sites. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. For example, AES Redondo Beach LLC finalized the sale of the power plant site to a private developer in March 2020. The new owner of the site is currently

considering future redevelopment options in discussions with the City of Redondo Beach and California Coastal Commission. As described in CEQA Guidelines Section 15126.6(f)(3), “[a]n EIR need not consider an alternative...whose implementation is remote and speculative.”

Comment LM-3

The comment restates general concerns regarding the size and height of the Project as well as the compatibility with the surrounding residential neighborhood. Refer to the response to LM-1 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Letter LD1

April 13, 2021
Lara Duke
Redondo Beach

Comment LD1-1

The comment questions the compatibility of the proposed Project with the existing zoning designation. As described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, the existing Beach Cities Health District (BCHD) campus is designated as P (Public or Institutional) by the Redondo Beach General Plan and zoned as P-CF (Community Facility) under the Redondo Beach Zoning Ordinance. The P designation is comprised of lands that are owned by public agencies, special use districts, and public utilities. This designation encompasses a range of different public and quasi-public uses. Specific purposes of the P Public and Institutional zone regulations are to provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to Beach Cities residents. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

Further, under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health-treated facilities, and residential care facilities are permitted on P-CF zones with a Conditional Use Permit (CUP). A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory

Care units at Silverado Memory Care. The proposed Project – like other improvements made on the BCHD campus in the past – would require a CUP under existing code. As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project would not conflict with any P-CF zoning codes.

Comment LD1-2

The comment claims that BCHD has increased the size and scale of the Project since 2019. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion of previous revisions to the proposed Healthy Living Campus Master Plan in response to public comments as well as building height and visual character.

Comment LD1-3

The comment expresses general concern regarding traffic, property values, and neighborhood character. However, the comment provides no substantial evidence supporting these assertions. Further the comment does not challenge any specific aspects of the thresholds, methodologies, or impact analysis provided in the Environmental Impact Report (EIR). It should also be noted that the purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this EIR as required by CEQA. However, the EIR does include a detailed analysis of potential impacts to community services and population and housing (refer to Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*) as well as physical changes that the proposed Project may have the surrounding community (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*). Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a full discussion of previous revisions to the Project in response to public comments as well as building height and visual character.

Comment LD1-4

The comment claims that the EIR describes “*no or only minimal adverse effects*” associated with the proposed Project. However, the EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.) Each of the conclusions provided in the EIR – including the

disclosure of the significant and unavoidable construction-related noise impacts – is supported by substantial evidence, technical studies, and/or exhaustive quantitative modeling efforts prepared by experts in their field.

Comment LD1-5

The comment expresses opposition to the Project and calls on the Redondo Beach Planning Commission and Redondo Beach City Council to do the same. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 1 – General Opposition to the Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter LD3

June 6, 2021
Lara Duke
Redondo Beach

Comment LD3-1

The comment incorrectly asserts that the City of Redondo Beach Measure DD would require a public vote on the proposed Health Living Campus. Measure DD, which was approved in 2008, requires a public votes for any zoning changes. The proposed Project would not require a zoning change. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation. Under Redondo Beach Municipal Code (RBMC) Section 10-2.1110, medical offices, health-treated facilities, and residential care facilities are permitted on P-CF (Community Facilities) zones with a Conditional Use Permit (CUP). A CUP is already in place for the Beach Cities Health Center located at 514 Prospect Avenue, addressing the development and ongoing use of the 60 Memory Care units at the Beach Cities Silverado Memory Care Community. The proposed Project – like other improvements made on the BCHD campus in the past – would require a CUP under existing code. As described in RBMC Section 10-2.1116 the floor area ratios (FAR), building height, number of stories, and setbacks of development in P-CF zones are subject to Planning Commission Design Review. Therefore, the scale, size, and character of the proposed Project would not conflict with any P-CF zoning codes.

Comment LD3-2

The comment claims that due to the size of the facility and the presence of other Assisted Living facilities in the City of Redondo Beach, the proposed Project is not compatible with the area surrounding the Project site. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a full discussion of previous revisions to the proposed Healthy Living Campus Master Plan in response to public comments as well as building height and visual character. Refer also to Master Response 3 – Project Need and Benefit. Regarding affordable housing concerns, it should be noted that 10 percent of the proposed Assisted Living units are being considered at below-market rates, therefore, implementation of the proposed assisted living units may help the City of Redondo Beach meet Regional Housing Needs Allocation (RHNA) for affordable housing.

Comment LD3-3

This comment is duplicative with Comment LD1-1; refer to the response to Comment LD1-1.

Comment LD3-4

This comment is duplicative of Comment LD1-2; refer to the response to Comment LD1-2.

Comment LD3-5

This comment is duplicative of Comment LD1-3; refer to the response to Comment LD1-3.

Comment LD3-6

This comment is duplicative of Comment LD1-4; refer to the response to Comment LD1-4.

Comment LD3-7

This comment is duplicative of Comment LD1-5; refer to the response to Comment LD1-5.

Comment LD3-8

The comment again questions the compatibility of the proposed Project with the existing zoning designation. Refer to response to Comment LD3-1 above and Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for detailed discussion regarding the compatibility of the proposed Project with the Redondo Beach Zoning Ordinance.

Letter LW

May 26, 2021
Laura Woolsey

Comment LW-1

The comment expresses opposition to the Project due to the size and the development adjacent to the City of Torrance. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter LDZ

June 10, 2021
Laura D. Zahn

Comment LDZ-1

The comment provides a list of concerns, without substantial evidence, regarding the height, size, cost, and benefits of the Project, as well as potential impacts related to noise, construction traffic, environmental hazardous, and air quality. Each of these issues is addressed in detail within the Environmental Impact Report (EIR), with analysis supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. Refer also to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to these issues.

Comment LDZ-2

The comment provides a description of the types of Assisted Living facilities the commenter has previously worked at and introduces the commenter’s concerns that are discussed further in the comment letter and addressed in the response to Comment LDZ-3 through LDZ-9 below.

Comment LDZ-3

The comment provides a description of the purposed realities of shared Assisted Living units. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment LDZ-4

The comment expresses concerns regarding the use of elevators in the proposed Residential Care for the Elderly (RCFE) Building, particularly when crowded or in the event of an earthquake. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been noted and will be advanced to decision makers for further consideration during deliberations on the proposed Project. It should also be noted that unlike the existing buildings on the Project site, the proposed development would comply with the latest State and local building standards including Chapter 16 of the California Building Code (CBC) (as adopted by the Redondo Beach Municipal Code [RBMC] and the Torrance Municipal Code [TMC]), which contains specific requirements for seismic safety (refer to Section 3.6.2, *Regulatory Setting*).

Comment LDZ-5

The comment expresses concern for the mealtime conditions at the proposed RCFE Building, based on the commenter's previous experience working in Assisted Living facilities. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment LDZ-6

The comment states that hallways in assisted living facilities get crowded with first responders, cleaning and maintenance workers, and residents moving in/out or using walkers/wheelchairs/power chairs. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment LDZ-7

The comment expresses concern regarding the potential for fire safety impacts associated with the RCFE Building and the response times of the RCFD. As described in Section 3.13, *Public Services*, as part of the development review processes for the proposed Project, the Redondo Beach Fire Department (RBFDD) and Torrance Fire Department (TFD) would review the final designs of Phase

1 and Phase 2 prior to issuance of Certificates of Occupancy to ensure that all development is designed to meet the required fire protection safety standards in the Fire Code, thus reducing overall demand for fire protection services. BCHD coordinated with RBFD regarding the requirements for emergency access as a part of the development of the preliminary site development plan for Phase 1 to ensure that the pedestrian promenade would adequately support fire engines and other RBFD assets used during a fire response or Emergency Medical Service (EMS) response.

Comment LDZ-8

The comment expresses concern regarding the commenter’s previous experience working in assisted living facilities and the conditions of these facilities, separate from the proposed Project. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment LDZ-9

The comment provides a list of recommendations for the RCFE Building, including but not limited to, the proposed height of the building, the ratio of residents to RCFE staff, provision of outdoor spaces, and the conditions for hiring staff. These recommendations do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter LAC

March 24, 2021
Leanne & Andy Clifton

Comment LAC-1

The comment expresses general concern for the size of the proposed Project, asserting, without substantial evidence, that it seems too large. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussions and response to comments pertaining to building height and visual character. As described therein, while development of the proposed RCFE Building would substantially alter existing views of and across the Project site from representative

views surrounding the site, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

Comment LAC-2

The comment claims, without substantial evidence or expert opinion, that the incorporation of a leisure pool in the proposed Aquatics Center in Phase 2 of the Project would not improve the health of the community. Instead, the comment asserts that an Olympic-sized pool should be considered to provide a space for club and high school teams to practice swimming. As described in Section 2.5.2.1, *Proposed Uses*, the proposed leisure pool would be provided indoors in the Aquatics Center. The outdoor portion of the Aquatics Center could include an outdoor pool that would be designed for fitness activities such as lap swimming, aquatic fitness classes. It should also be noted that programming for the Aquatics Center was informed by a market feasibility analysis prepared by Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies. This study also included a robust local survey involving 2,256 responses that focused on the types of aquatic programs in which the respondents were interested. This comment does not address the adequacy to the EIR or the impact analysis and represents the commenter's opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Healthy Living Campus Master Plan.

Letter LHPQ

June 7, 2021
Leanne Hill & Peter Quelch

Comment LHPQ-1

The comment provides a description of the commenters' ties to the community and expresses frustrations with a gas line construction project that is unrelated to the proposed Project. Nevertheless, this comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment LHPQ-2

The comment claims the Assisted Living units included in the proposed Residential Care for the Elderly (RCFE) Building would be affordability only to the affluent. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the cost of proposed senior living accommodations.

Comment LHPQ-3

The comment makes unreferenced and unsubstantiated claims regarding potential impacts on air space, air pollution including dust, noise, and traffic. Impacts related to these resource areas are addressed in Sections 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*; Section 3.11, *Noise*, and Section 3.14, *Transportation*, respectively. The comment does not challenge any specific aspects of the thresholds, methodologies, or environmental impact analysis provided therein. Consistent with CEQA Guidelines Section 15204(b), “...if persons...believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant.” Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment LHPQ-4

The comment claims that the proposed Project is intended to generate revenue for the Beach Cities Health District (BCHD), developers, and the City of Redondo Beach at the expense of adjacent residents. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project. The matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies – as well as numerous well-noticed public hearings. After careful consideration of projected community health needs over the coming decades, the BCHD Board of Directors identified the proposed Project as a key component to addressing future community health needs and drafted a set of project objectives, which helped define those health needs and project benefits which guided project design.

Comment LHPQ-5

The comment restates general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter LJZ

July 12, 2021

Linda and Joe Zelik
19405 Linda Dr., Torrance

The individual comments provided in this letter are identical to and responded to in Letter GPA.

Letter LK

June 9, 2021
Linda Kranz
19312 Hinsdale Ave.
Torrance, CA 90503

Comment LK-1

The comment provides a description of the commenter's ties to the West Torrance community and expresses concern regarding the health and safety of the community, particularly the pedestrian and bicycle safety of students traveling to school. Detailed discussion of the potential impacts on traffic and pedestrian safety is presented in Section 3.14, *Transportation* under Impact T-3. As discussed therein, increased construction traffic on freeways and streets, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. Construction activities could also result in potential conflicts between vehicles, bicycles, and pedestrians in the vicinity of the Project site, and impacts are considered potentially significant. However, to avoid construction-related safety hazards, the Environmental Impact Report (EIR) identifies Mitigation Measure (MM) T-2, which would require the preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers to be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible. Refer to Master Response 13 – Transportation Analysis, which describes that construction haul routes have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to

schools. As described therein, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts.

Comment LK-2

The comment expresses concern regarding potential air quality impacts during construction activities associated with the proposed Project. As described under Impact AQ-2 in Section 3.2, *Air Quality*, peak daily criteria pollutant emission were calculated for each phase on construction. This modeling effort determined that unmitigated localized construction emissions from the proposed Project would exceed South Coast Air Quality Management District's (SCAQMD's) Localized Significance Thresholds (LSTs) for PM₁₀ and PM_{2.5} (fugitive dust). However, implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 miles per hour, which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for PM₁₀ and PM_{2.5} below the SCAQMD's LSTs. A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment LK-3

The comment expresses general concerns, without substantial evidence or expert opinion, regarding construction related noise. As described in Section 3.11, *Noise* the proposed Project would result in significant and unavoidable noise impacts, which are described in detail under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Mitigation Measure (MM) NOI-1 would require the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division and Torrance Building & Safety Division, to the extent that construction activities occur within the City of Torrance right-of-way. The Construction Noise Management Plan would restrict the hours of construction activities and would require noise barriers and the implementation of best management practices (BMPs) that would effectively further reduce the noise levels. Nevertheless, these temporary, but prolonged construction-related noise impacts would remain significant and unavoidable. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to commenters pertaining to noise.

Comment LK-4

The comment expresses general concerns, without substantial evidence, regarding the Project's potential impacts on local wildlife. As thoroughly discussed in Section 3.3, *Biological Resources*, the existing BCHD campus is fully developed with multi-story buildings and paved surfaces and vegetation on the Project site is limited to landscaped trees, shrubs, and grasses. No sensitive natural community including wetlands, streams, creeks, lakes, vernal pools, marshes, other water bodies, or riparian habitats exists on the Project site or in the surrounding vicinity. Due to the developed, urbanized nature of the Project site and the surrounding vicinity, there are no recognized wildlife corridors or habitat linkages. Due to the developed, urbanized character of the Project site and the surrounding vicinity, the analysis of biological resources is focused on potential impacts to the landscaped trees and shrubs at the Project site that could potentially serve as nesting and roosting sites for resident or migratory birds.

While the Project would result in the removal of landscaped trees and shrubs within the interior portions and along the perimeters of the existing BCHD campus, the proposed Project's landscaping plan would replace trees and shrubs with new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal Code (RBMC) Section 10-2.1900, and proposed tree removal and landscaping along Flagler Lane would be conducted consistent with the Torrance Street Tree Master Plan. The proposed landscaping – including large landscaped trees and shade trees that are adapted to the climate of Southern California – would provide enhanced roosting or nesting habitat for resident and migratory birds. In addition, the implementation of MM BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged (i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be less than significant with mitigation.

Comment LK-5

The comment expresses concern for the level of noise associated with Project construction and claims the commenter would be subject to daily construction noise for years. Refer to the response to Comment LK-3 as well as Master Response 12 – Noise Analysis. As described in Section 3.11,

Noise, each stage of construction would involve a different mix of operating equipment, and noise levels would vary based on the amount and types of equipment in operation and the location of the activity.

Comment LK-6

The comment claims, without substantial evidence, that the proposed Project is out-of-scope and too large for the existing neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion related to these issues. As described therein, development of the proposed RCFE Building would substantially alter existing views of and across the Project site from representative views surrounding the site. However, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

The comment goes on to assert that the proposed Project is too costly, with little value-added to the quality of life in the surrounding community. Refer to Master Response 6 – Financial Feasibility/Assurance as well as Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to these issues.

Comment LK-7

The comment expresses opposition to the proposed Project, particularly access to the Project from Flagler Lane, Flagler Alley, and all land within the City of Torrance. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should also be noted that Section 5.0, *Alternatives*, considers four alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane.

Letter LY

June 15, 2021
Lisa Youngworth

Comment LY-1

The comment expresses general opposition to the proposed Project, asserting, without substantial evidence, that the proposed Project would result in traffic, safety, health and environmental

hazards. The comment also goes on to assert, again without substantial evidence, the proposed Project is too tall and too dense for the surrounding single-family residential neighborhood. Traffic and safety issues are discussed at length in Section 3.14, *Transportation*, and are supported by various transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Similarly, Section 3.2, *Air Quality* and Section 3.8, *Hazards and Hazardous Materials* provide a detailed analysis of potential environmental hazards, supported by exhaustive air quality modeling as well as Phase I and Phase II Environmental Site Assessment (ESAs). The comment provides no specifics or further details to clarifying its assertions.

The comment asserts that there is a lack of transparency with the public, but does not provide any supporting information to substantiate this assertion that BCHD has not been fully transparent with the public. Contrary to the assertion in this comment, BCHD has been dedicated to engaging in public outreach, including forming a 20-person Community Working Group (CWG) to represent the various populations and organizations in the Beach Cities and engage local participants in the planning of proposed redevelopment. The proposed Project was developed as a result of more than 60 meetings hosted over a 3-year period and attended by more than 550 community members. The proposed Project has also been discussed at numerous well-noticed public meetings, including five scoping meetings, an unusually high number. The claim that BCHD lacks transparency with the public is unfounded.

The comment claims, again without substantial evidence, that the proposed Project is too tall and too dense for a residential neighborhood. First, it is important to note that each of the environmental issues raised in this comment were addressed in the EIR. Visual impacts – including potential impacts relating to building height, which also considered the topography of the Project site and the surrounding area – were addressed in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 and Impact VIS-2. This analysis is supported by more than a dozen photographs, detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. Refer to Master Response 9 – *Aesthetics and Visual Resources Analysis* for a detailed discussion and response to comments pertaining to building height and visual character.

Finally, the comment claims that the Project is a poor use of taxpayer funds. Refer to Master Response 6 – *Financial Feasibility/Assurance* for a detailed discussion and response to comments pertaining to this issue.

Comment LY-2

The comment provides a link to and agrees with the information provided in the following webpage: <https://www.traonews.org/why-oppose>. These reasons are provided by Torrance Redondo Against Overdevelopment (TRAO), and are also referenced and responded to in Letter GPA.

Letter LH2

June 3, 2021
Lyndon Hardy

Comment LH2-1

This comment incorrectly states that there are no visualizations of Phase 2 structures and asserts that there is no data upon which to judge the visual impact of the proposed Aquatic Center and parking structures. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments on issues pertaining to the programmatic analysis of the Phase 2 development program. Generally, a program Environmental Impact Report (EIR) analyzes a project for which less specific detail is currently known, but would be developed at a later date.

The visual impact analysis relies on the best available information for the development program in Phase 2. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the development program under Phase 2 of the proposed Healthy Living Campus Master Plan is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions based on maximum disturbance footprints and maximum building heights.

The EIR makes no excuses about the programmatic nature of the Phase 2 development program. Rather, the EIR discloses this information and provides a defined scope for the programmatic analysis. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in

the program EIR, later analysis of the environmental effects of the activities may be required (California Environmental Quality Act [CEQA] Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Comment LH2-2

The comment claims that the increase in traffic resulting from the implementation of Phase 2 is inadequate asserting that the contractors were unqualified and used data that did not apply. The EIR includes a robust transportation study provided as Appendix K, which was prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. Fehr & Peers also assisted the City of Redondo Beach with the recently adopted Vehicle Miles Traveled (VMT) threshold. Fehr & Peers is clearly qualified and well suited to prepare the analysis for the proposed Healthy Living Campus.

As thoroughly described in Section 3.14.3, *Impact Assessment and Methodology*, Fehr & Peers began with the standard Institute of Transportation Engineers (ITE) trip generation rates, which represents the industry standard for estimating trip generation and is based on a compilation of empirical (i.e., observed) trip generation surveys at locations throughout the country. While ITE Trip Generation is a defensible approach, ITE always recommends utilizing local data where it is available. Therefore, Fehr & Peers calibrated these rates by incorporating driveway counts, pedestrian surveys, Center for Health and Fitness (CHF) membership scans, BCHD programming information, and market feasibility studies.

The comment does neither challenges any specific aspect of this methodology nor suggests a different methodology that would better meet the suggest level of sufficient rigor.

Comment LH2-3

The comment incorrectly suggests that the air quality analysis did not account for fine particulate matter (PM_{2.5}). In particular the comment suggests that the cumulative effects of PM_{2.5} emissions have been overlooked.

Fine particulate matter is discussed at length in Section 3.2, *Air Quality* and potential health effects associated with fluctuations in PM_{2.5} are disclosed. As described under Impact AQ-2, peak daily criteria pollutant emissions from construction of the proposed Project would not exceed the South Coast Air Quality Management District's (SCAQMD's) mass daily significance thresholds for construction. Unmitigated localized construction emissions from the proposed Project would exceed the SCAQMD's Localized Significance Thresholds (LSTs) for PM₁₀ and PM_{2.5} (fugitive dust). However, implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 miles per hour (mph), which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for PM₁₀ and PM_{2.5} below the SCAQMD's LSTs.

It should also be noted that a Health Risk Assessment (HRA) was prepared for the proposed Project, which demonstrated that the use of Tier 4 Final engines would reduce Diesel Particulate Matter (DPM) emissions from combustion by 94 percent during Phase 1 construction and 79 percent during Phase 2 construction (refer to Table 3.2-11). Therefore, mitigated DPM emissions anticipated during construction activities would not exceed SCAQMD thresholds for cancer risk, and impacts would be less than significant with mitigation.

The comment does not challenge any specific aspect of these quantitative modeling exercises and does not provide any substantiating evidence linking the modeled emissions to a physical environmental impact.

With respect to cumulative impacts, as discussed under Impact AQ-1, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would not conflict with the 2016 Air Quality Management Plan (AQMP), which serves as the Basin's approved AQMP; therefore, the project's contribution to air quality impacts would not be cumulatively considerable under CEQA. As described in Section 3.2.3.2, *Methodology*, SCAQMD's cumulative significance thresholds are the same as project-specific significance thresholds. As such, the SCAQMD considers projects that do not exceed the project-specific thresholds to not contribute considerably to a cumulatively significant impact.

Comment LH2-4

The comment claims that a programmatic procurement approach would be used during the proposed development under Phase 2 and asserts that so long as these details do not violate any data limits they can be anything leaving the public with no opportunity to object. The comment

claims that this is an end-around that defeats the purpose of CEQA for the development under Phase 2.

As described in the response to Comment LH2-1, a programmatic analysis simply assesses a project for which less specific detail is currently known, but would be developed at a later date. As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Additionally, it should also be noted that all development under Phase 1 and Phase 2 of the proposed Healthy Living Campus Master Plan would be subject to Redondo Beach Planning Commission Design Review(s) in compliance with the Community Facility (P-CF) zoning designation for the Project site as established in RBMC Section 10-2.1116 and TMC Section 13.9.7.

Comment LH2-5

The comment incorrectly asserts that under the Design-Bid-Build procurement process the contractor can negotiate changes in the design and sidestep the CEQA process. However, in compliance with CEQA Guidelines Section 15162, any substantial changes to a proposed project would need to be reassessed to determine whether it would result in a new significant environmental effect(s) or a substantial increase in the severity of a previously identified significant effect(s). If so, and depending to what extent, a Subsequent EIR (CEQA Guidelines Section 15162), a Supplemental EIR (CEQA Guidelines Section 15163), or an Addendum (CEQA Guidelines Section 15164) to the previously prepared EIR may be required.

Comment LH2-6

The comment incorrectly asserts that the Healthy Living Campus Master Plan has been constructed to that the entire CEQA process becomes measures a check-the-box exercise. As is common with various large scale capital improvement and infrastructure projects, the Healthy Living Campus Master Plan has been broken into phases for planning and implementation purposes. The process for assessing the environmental impacts in this scenario is clearly described in the CEQA Guidelines Section 15165:

“Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect.”

As described in As described in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency of the responsibility for complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Letter MB1

May 26, 2021
M. Bursschinger

Comment MB1-1

The comment requests that the Beach Cities Health District (BCHD) not move forward with the proposed Project. The comment claims, without substantial evidence, that it would not be beneficial to the community, would be too expensive and detrimental to build, and the proposed Assisted Living units would not be affordable. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to the need for the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for detailed discussion and response to comments pertaining to the financial characteristics and economic impacts of the proposed Project. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to the affordability of the proposed senior residential care.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MCG

June 8, 2021
Marcia & Carl Gehrt
19935 Redbeam Avenue
Torrance, Ca 90503

Comment MCG-1

The comment states that implementation of the proposed Project is not consistent with the mission statement of the Beach Cities Health District (BCHD) and suggests the proposed Project is profit-motivated as evidenced including gym and workout classrooms under Phase 2, if funds are available. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need for the proposed Project. It should also be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

Comment MCG-2

The comment briefly summarizes the significant and unavoidable noise impact identified in Section 3.11, *Noise* under Impact NOI-1. The comment suggests that eliminating the removal of structures from the proposed Project would mitigate noise impacts to nearby residences. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives, which describe the underlying purpose for the removal of the existing Beach Cities Health Center, including escalating maintenance costs as well as potential seismic safety issues.

Comment MCG-3

The comment suggest removing demolition activities from the proposed Project would eliminate risk related to release of hazardous materials in proximity of sensitive receptors including Towers Elementary students. As described in Master Response 11 – Hazards and Hazardous Materials Analysis, with the implementation of the required mitigation measures, potential impacts associated with hazardous building materials during demolition would be less than significant and would not jeopardize the health of the surrounding community or nearby sensitive receptors.

Comment MCG-4

The comment describes that condominium and apartments in the Greater Los Angeles Area are implementing earthquake preventive measures and suggests such strategies be implemented at the Project site. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments regarding escalating maintenance costs and seismic safety. As described in the *Beach Cities Health District Seismic Assessment* prepared by registered professional geologists Nabih Youssef Associates, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible.

Nevertheless, it should be noted that the under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease

building space to fund community health and wellness programs and services, similar to existing conditions.

Comment MCG-5

The comment claims that the new gym included in the proposed Project could be enlarged and other programs that support aging in place could be expanded. It should be noted that Phase 2 of development would support space for a new CHF. Additionally, with regard to aging in place, it should be noted the BCHD Campus currently provides in-home services for adults, volunteer support, care planning and consultation, and limited transportation assistance. Additionally, the proposed Program of All-Inclusive Care for the Elderly (PACE) program would support these existing services. As provided in Section 2.5.1 *Preliminary Site Development Plan*, “*PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation.*” As such, implementation of the proposed PACE program would support residents who wish to age in place. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need and anticipated benefit of the proposed Project.

The comment asserts the proposed Project is motivated by profit and must be stopped. However, as described in the response to Comment MCG-1, it should also be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities.

Comment MCG-6

The comment expresses general opposition to overdevelopment. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MG1

March 24, 2021
Redondo Beach Resident

Comment MG1-1

The comment expresses opposition to the proposed Project and claims that neither the Beach Cities Health District (BCHD) Board of Directors nor BCHD management have not addressed the concerns of residents. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment MG1-2

The comment states the Project site is owned by residents, presumably residents of the Beach Cities and intended for public use by the community. The comment further states the Project site is not intended to benefit the few of BCHD management. However, contrary to this comment, the campus is owned by BCHD, a public agency and is designated P (Public or Institutional) land use within the Redondo Beach General Plan. The P designation includes lands that are owned by public agencies, special use districts, and public utilities. Permitted uses under the P land use designation include governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (i.e., schools), cultural (e.g., libraries, museums, performing and visual arts, etc.), human health, human services, public utility easements, and other public uses. The proposed Project would expand existing human health, human services, and recreational facilities which are consistent with the P land use designation and would continue to serve the public. Please refer to Section 3.10, *Land Use and Planning* for detailed discussion of Project impacts on land use and consistency with applicable land use planning goals, policies, and regulations that govern the use and development of the Project site. Refer also to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need and anticipated benefit of the proposed Project.

Comment MG1-3

The comment asserts, without substantial evidence or expert opinion, that the proposed Project is not compatible with the surrounding neighborhood, noting the height of proposed development and the nearby residences. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis

for a detailed discussion and response to comments pertaining to building height and visual character. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings

Comment MG1-4

The comment expresses opposition to BCHD's role as the lead agency. The comment also questions choices between funding for Phase 1 and Phase 2. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to BCHD's role as lead agency. Refer also to Master Response 6 – Financial Feasibility/Assurance for detailed discussion and response to concerns regarding the financial characteristics and economic impacts of the proposed Project.

Comment MG1-5

The comment states the number of units included under the proposed Assisted Living program and Memory Care community were not included when the city's Regional Housing Needs Allocation (RHNA) was calculated. As described Section 3.12.1, *Environmental Setting*, the RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The Southern California Association of Governments (SCAG) determines the housing growth needs for municipalities within its jurisdiction, which includes the City of Redondo Beach and the City of Torrance. As required by State Housing Law, both cities are in the process of updating their General Plan Housing Elements to accommodate the allocated units and plan for future population growth. As a special district dedicated to public healthcare, BCHD is not subject to the RHNA and is not required by State Housing Element Law to plan for residential units on its campus. However, 10 percent of the proposed units are being considered at below-market rates, therefore, implementation of the proposed assisted living units may help the City of Redondo Beach meet RHNA for affordable housing.

Comment MG1-6

The comment requests the Draft EIR be opposed. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MG2

June 10, 2021
Marcie Guillermo, Pharm.D.
Redondo Beach Resident

Comment MG2-1

The comment states, without substantial evidence, that the Environmental Impact Report (EIR) fails to provide a decent analysis of the six alternatives and requests analysis be prepared keeping in mind community concerns. However, the comment fails to provide specifics or clarifying details describing how alternatives analysis is insufficient.

Comment MG2-2

The comment questions why Alternative 1 – No Project Alternative (Demolish and Replace with Open Space) does not consider leaving the Project site in its current condition. As described under Section 5.5.5, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)*, under the No Project Alternative, the Beach Cities Health District (BCHD) would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is “*reasonably expected to occur in the foreseeable future*” clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

Comment MG2-3

The comment suggests regarding Alternative 6 – Reduced Height Alternative that heights of proposed structures be kept consistent with the surrounding neighborhood. The comment questions why the height of structures in the City of Redondo Beach would be different from an adult living

structure in City of Manhattan Beach. The comment further asserts that the proposed Project does not belong in a neighborhood characterized by residential homes and schools. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments on building height and visual character.

It should also be noted that the proposed development has been sized to provide adequate square footage to support the proposed uses and to meet the project objectives related to revenue generation. With regard to revenue generation specifically, it should be noted that the project objectives make plain that the development under the proposed Healthy Living Campus Master Plan must be financially viable, a prudent course of action for any public agency. Nevertheless, as described in Redondo Beach Municipal Code (RBMC) Section 10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district are subject to Planning Commission Design Review. The comment cites RBMC Section 10-2.2502, which guides the Planning Commission Design Review. As described in Section 3.1, *Aesthetics and Visual Resources* and Section 3.10, *Land Use and Planning*, the Planning Commission Design Review could further revise the proposed Project (e.g., limit FAR, building height, setbacks, etc.); however, the EIR appropriately defines and analyzes the maximum disturbance envelope pursuant to the requirements of California Environmental Quality Act (CEQA).

Comment MG2-4

The comment states a healthy campus is needed for the *entire* community. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MB2

June 9, 2021
Maren Blyth

Comment MB2-1

The comment expresses general opposition to the proposed Project. The comment incorrectly states that the proposed Project would convert the Project site from a public to private enterprise. The existing campus is owned by the Beach Cities Health District (BCHD); this ownership would not be changed under implementation of the proposed Project. The existing campus is also

designated P (Public or Institutional) land use within the Redondo Beach General Plan. Permitted uses under the P land use designation include governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (i.e., schools), cultural (e.g., libraries, museums, performing and visual arts, etc.), human health, human services, public utility easements, and other public uses. The proposed Project would expand existing human health, human services, and recreational facilities which are consistent with the P land use designation and would continue to serve the public. Finally, it should also be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

Comment MB2-2

The comment expresses concern related to the funding of demolition and redevelopment of the health center building proposed under Phase 2 of the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to these issues. Contrary to the commenter’s assertion, the Center for Health and Fitness (CHF) as well as the existing health and wellness programs and services would still be available during Phase 1 and Phase 2 of the proposed Project. In fact, the implementation of the proposed Project would address the existing maintenance costs that are beginning to outpace revenues, and would ensure that these health and wellness programs and services could continue on into the future.

Comment MB2-3

The comment states that the proposed Project should be dropped. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MS

June 6, 2021
Maria Schneider

Comment MS-1

The comment expresses opposition to the proposed Project and concern for adverse health impacts on nearby residences and school students. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should also be noted that impacts to sensitive receptors are clearly described throughout the EIR, including a quantitative analysis of construction-related air quality, hazards and hazardous materials, and noise. Refer to Master Response 10 – Air Quality Analysis, Master Response 11 – Hazards and hazardous Materials, and Master Response 12 – Noise Analysis.

Comment MS-2

The comment expresses general concerns, without substantial evidence or expert opinion, regarding health impacts related to air quality, water quality, pollutants, soil erosion, and traffic congestion. Each of these issues is addressed in detail within the EIR. For example, the air quality analysis presented in Section 3.2, *Air Quality* presents the results of the California Emissions Estimator Model (CalEEMod) and construction Health Risk Assessment (HRA) prepared for the proposed Project by the air quality experts at iLanco. The CalEEMod results and the conclusion of the construction HRA are the results of carefully made assumptions regarding schedule, duration, construction equipment, and application of air emissions control measures as well as robust air quality modeling. The air quality analysis compares the results of these studies to the quantitative significance thresholds established by the South Coast Air Quality Management District (SCAQMD) and meets all of the requirements in the California Environmental Quality Act (CEQA) Guidelines. Beyond simple assertions that construction activities would result in health impacts on , the comments provided on this issue do not challenge the methodology, assumptions, or quantitative results of this extensive quantitative modeling effort.

Comment MS-3

The comment asserts, without substantial evidence or expert opinion, that there would be inconveniences of traffic and noise as well as impacts on air, water, and soil quality. These issues are thoroughly addressed in Section 3.2, *Air Quality*, Section 3.6, *Geology and Soils*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.9, *Hydrology and Water Quality*, Section 3.11,

Noise, and 3.14, *Transportation*. Potential impacts on sensitive receptors are also described therein, where appropriate.

Letter MN1

March 10, 2021
Mark Nelson

Comment MN1-1

The comment notes that Table ES-2 of the Draft Environmental Impact Report (EIR) does not include the impact comparison of Alternative 6. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

Letter MN2

March 22, 2021
Mark Nelson

Comment MN2-1

The comment objects to a previous response provided by the Beach Cities Health District's (BCHD's) public records request system. The comment further states that due to BCHD's indication that the proposed Project would not involve land acquisition, either this statement is true, no acquisition would occur under the proposed Project, or the EIR made a misrepresentation. As described in Section 2.2.1, *Project Location*, the Project sites contain two legal parcels: Assessor's Identification Number [AIN] 7502-017-903 and AIN 7502-017-902. The proposed Project would not expand beyond these properties or outside existing boundaries.

Letter MN3

March 22, 2021
Mark Nelson

Comment MN3-1

The comment states the revised 2020 Master Plan is taller and occupies a greater square footage than project designs proposed under the 2019 Master Plan. The comment notes previous petition regarding the size of the development proposed under the 2019 Master Plan. The comment incorrectly states the current version of the proposed Healthy Living Campus Master Plan removed 160,000 square feet of underground parking and relocated it to an 800-car parking structure. Refer

to Master Resources 9 – Aesthetics and Visual Resources for a summary of previous revisions to the proposed Healthy Living Campus Master Plan. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment MN3-2

The comment expresses doubt regarding the number of comments received by BCHD, noting submitted petitions, comments on the Notice of Preparation (NOP), and comments provided on June 17, 2020 and suggests public comments have been discarded. All comments received during the review periods for the NOP and the Draft EIR are published on the BCHD website here: <https://www.bchdcampus.org/eir>. Since their publication, BCHD has not received communication that a comment has been omitted or discarded.

Comment MN3-3

The comment states BCHD increased the height and square footage of proposed development. Refer to Master Resources 9 – Aesthetics and Visual Resources for a summary of previous revisions to the proposed Healthy Living Campus Master Plan. The comment goes on to assert, without substantial evidence or expert opinion, that the community has suffered environmental and economic injustice impacts as well as siren, traffic, noise, air quality, nighttime lighting, and reduced property value impacts related to the former South Bay Hospital. Physical environmental impacts of the proposed Project are addressed in detail in the EIR and are supported by technical studies and exhaustive modeling efforts. The comment does not challenge as specific aspects of the thresholds, methodologies, or findings of this analysis. Property value loss and environmental justice impacts in and of themselves are not physical impacts on the environment that are required to be included in a CEQA analysis. Specifically, CEQA states that “...an economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Section 15131 and 15382).

Letter MN4

March 24, 2021
Mark Nelson

Comment MN4-1

The comment states that BCHD falsely claims that the most recent iteration of the proposed Project would decrease building square footage, compared to earlier project designs. The comment

provides an unsubstantiated claim that the proposed Project would move 160,000 square feet of subterranean parking to the surface buildings, thereby increasing overall surface buildings. The comment concludes BCHD must retract false information. As described in Section 2.5.2, Phase 2 Development Program, due to the programmatic nature of Phase 2, the ultimate location and size of the proposed parking structure has not yet been finalized. However, the proposed parking structure would not exceed 292,500 square feet of parking or 736 parking structures

The comment does not address information provided in the EIR, but points to the BCHD website as the subject of dissent. As provided in Table 1-2 of the EIR, the 2019 Master Plan included a total occupied building area of 592,700 square feet. However, as described in Section 1.0, Introduction, community response to the 2019 Master Plan expressed concern regarding the 2019 project's proposed density. In response, the 2020 and current proposed Project reduced total occupied building area to 484,900 square feet. This reduction in total building area was achieved through site redesign and reducing the size of the proposed RCFE Building by more than 219,000 square feet. Overall, the proposed Project would reduce total occupied building area would be than that proposed under the 2019 Master Plan.

Letter MN5

March 24, 2021
Mark Nelson

Comment MN5-1

The comment asserts that the Beach Cities Health District (BCHD) elected to be the lead agency so that it could self-certify the Final Environmental Impact Report. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response comments pertaining to this issue.

Letter MN6

March 24, 2021
Mark Nelson

Comment MN6-1

The comment provides a link to an article titled *John Wood Group reserves \$46M to resolve bribery investigations*. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN7

March 24, 2021

Mark Nelson

Comment MN7-1

The comment provides a link to an article prepared by Corporate Watch titled *Wreckers of the Earth: London Company Directory*. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN8

March 25, 2021

Mark Nelson

Comment MN8-1

The comment states that tetrachloroethylene (PCE) contamination must be remediated by excavation, citing it as the most effective decontamination method. As described in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-2, PCE-contaminated soils would be encountered during ground-disturbing activities, which include excavation of the subterranean levels of the Residential Care for the Elderly (RCFE) Building, proposed parking structure, and service levels. However, implementation of MM HAZ-2a through HAZ-2d would ensure contaminated soils are properly detected, removed, and handled during ground disturbing. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to this issue.

Letter MN9

March 25, 2021

Mark Nelson

Comment MN9-1

The comment claims BCHD failed to fulfil a public records request in a timely fashion, impeding public evaluation. The public records request in question requests information on the cost-effectiveness of seismic retrofit and demolition and reconstruction. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project.

It should be noted that CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (*Sierra Club v. County of Napa* [2004] 121 Cal. App. 4th 1490, 1503).

It should also be noted that Section 5.5.1, *Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space* explores a seismic retrofit – funded by a local bond measure.

Letter MN10

March 25, 2021
Mark Nelson

Comment MN10-1

The comment claims BCHD failed to fulfil a public records request. The public records request in question requests documentation of reduced open space between the 2019 Master Plan and the proposed Project. As demonstrated in Table 1-2, active opens space in the 2019 Master Plan was reduced from 3.6 acres to 2.45 acres under the proposed Project. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

Letter MN11

March 25, 2021
Mark Nelson

Comment MN11-1

The comment expresses general concerns regarding the Beach Cities Healthy Living Campus Master Plan. The comment asserts that the document fails to provide an accurate, stable, and finite Project Description, causing the public to spend excess time and money evaluating the draft. The comment claims that without a final product, the public is unable to engage in intelligent participation.

Regardless of the commenter’s opinion of the Beach Cities Healthy Living Campus Master Plan, Section 2.0, *Project Description* meets the requirements of CEQA Guidelines Section 15124.

Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic description and programmatic analysis of the Phase 2 development program.

Letter MN12

March 26, 2021
Mark Nelson

Comment MN12-1

The comment requests information and documentation regarding seismic risk and other seismic-related effects of the Beach Cities Health Center. This public records request is not pertinent to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project.

As described in Section 2.1, *Introduction* and Section 2.4.2, *Project Background*, a seismic evaluation was conducted by registered professional geologists Nabih Youssef Associates in March 2018. This study has been discussed at numerous Community Working Group (CWG) meetings and well-noticed BCHD Board of Directors public hearings. As described in the *Beach Cities Health District Seismic Assessment* and Section 2.4.2, *Project Background*, the evaluation found seismic-related structural deficiencies in the north tower and south tower of the Beach Cities Health Center and the attached maintenance building (514 North Prospect Avenue), and to a lesser extent the Beach Cities Advanced Imaging Building (510 North Prospect Avenue). As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible.

It should be noted that BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Letter MN13

March 29, 2021
Mark Nelson

Comment MN13-1

The comment inquires if comments will be accepted for the Master Plan during the public comment period for the Draft Environmental Impact Report (EIR). The public review period, described in Section 1.4, *Public Review and Comments*, provides opportunity for interested parties to comment on the technical sufficiency of the Draft EIR. California Environmental Quality Act (CEQA) Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Letter MN14

April 2, 2021
Mark Nelson

Comment MN14-1

The comment requests information on analyses regarding the downsizing of BCHD, expenses associated with 514 North Prospect Avenue (Beach Cities Health Center and attached Maintenance Building) and reason why such costs cannot be deferred. The comment claims BCHD has not responded to previous public records act requests and suggests the need for the proposed Project, including seismic retrofit or demolition is not valid. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project.

It should be noted that CEQA states that an EIR should provide a description of the project, including a “...general description of the project’s technical, economic, and environmental characteristics,” the lead agency is not required to “...supply extensive detail beyond that needed for evaluation and review of the environmental impact” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (Sierra Club v. County of Napa [2004] 121 Cal. App. 4th 1490, 1503).

Letter MN15

April 4, 2021
Mark Nelson

Comment MN15-1

The comment provides the following excerpt from Section 3.1, *Aesthetics and Visual Resources* of the Environmental Impact Report (EIR): *“Impact VIS-1 The proposed Residential Care for the Elderly Building included in Phase 1 preliminary development plan would interrupt public views of the Palos Verdes hills from the highpoint at 190th Street and Flagler Lane. However, a reduction in the height of the building would reduce this impact to less than significant with mitigation.”*

The comment claims that this is an inaccurate statement, because the elevation at 190th Street & Prospect Avenue is 6 feet higher than the elevation at 190th Street & Flagler Lane. With regard to maximum elevation views along 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along 190th Street that provide slightly elevated views – including the intersection of 190th Street & Prospect Avenue, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource.

The comment provides supporting visual images of a homemade Google Earth Pro model of the proposed Project from two vantage points and notes where the model allegedly interrupts skyline views of the Palos Verdes ridgeline. First the homemade Google Earth Pro model does not follow the same rigorous methodology for developing photorealistic and technically accurate images as the computer-generated photosimulation that was prepared for Representative View 6 by VIZf/x, a licensed architect specializing in the creation and visualization of design simulations and the analysis of visual resource impacts. As described in Section 3.1.1, *Methodology*, *“[e]ach representative view was photographed to establish the existing visual condition from the selected public location. Photosimulations of the Phase 1 preliminary site development plan 3D model were prepared from each representative view to provide a ‘before and after’ representation for analysis. The representative analysis focuses on changes from existing conditions as they would be experienced by motorists, bicyclists, and pedestrians from the public realm. The base photography and photosimulations at each representative viewing location were independently prepared by VIZf/x. VIZf/x used a Nikon d7100 camera with a 35-millimeter lens giving the closest approximation to the human eye. The source image is comprised of between 8 and 10 vertical renderings captured from a tripod and stitched together to create the source base image. Each*

rendering is 25 percent of what the actual 35-millimeter lens captures, which minimizes any curvature to the architecture and reduces distortion.

More importantly, the homemade Google Earth Pro model does not accurately depict topography, vegetation, and intervening structures. A simple Google Street view at the intersection of 190th Street & Prospect clearly show that the Beach Cities Health Center already interrupts the Palos Verdes ridgeline and is further obscured by power lines and street trees that line Prospect Avenue. While the development under the proposed Project would be visible and would still interrupt the Palos Verdes ridgeline, when viewed from this location this would not represent a new interruption like it would 190th Street & Flagler Lane.

It should further, it should be noted that CEQA Guidelines Section 15151 states that “[a]n evaluation of environmental effects of a proposed project need not be exhaustive...”. This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources must consider all views, but need only identify those that are the most representative and would provide “...a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations” (CEQA Guidelines Section 15151).

Refer to BCHD Master Response 9 – Aesthetics and Visual Resources Analysis for further discussion pertaining to impacts to scenic resources.

Letter MN16

April 4, 2021
Mark Nelson

Comment MN16-1

The comment identifies financing rates and bond rates and suggests use of A-rated bonds, and non-profit management could create a more affordable Assisted Living Program. See Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments pertaining to this issue. However, again, it should be noted that the California Environmental Quality Act (CEQA) states that an Environmental Impact Report (EIR) should provide a description of the project, including a “...general description of the project’s technical, economic, and environmental characteristics,” the lead agency is not required to “...supply extensive detail beyond that needed for evaluation and review of the environmental

impact” (CEQA Guidelines Section 15124). Further, CEQA Guidelines Section 15204 states that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Letter MN17

April 4, 2021
Mark Nelson

Comment MN17-1

The comment states 80 percent of residents of the proposed assisted living units will come from outside of the Beach Cities. The comment states that Redondo Beach will accrue economic and environmental justice impacts while receiving few benefits. As described in Market Response 5- Affordability of RCFE Assisted Living and Memory Care Units, the market study prepared for the proposed Project identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD’s broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. The comment incorrectly claims Redondo Beach has born environmental justice impacts for 60 years related to the operation of the Project site. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

Letter MN18

April 5, 2021
Mark Nelson

Comment MN18-1

The comment asserts that the Beach Cities Health District (BCHD) is attempting to block intelligent public participation due to lack of response to California Public Records Act. California Environmental Quality Act (CEQA) Guidelines Section 15204 states that “[i]n reviewing draft

EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

As described in response to this comment via email, BCHD has determined that the commenter’s numerous requests for public documents imposes an excessive burden on BCHD’s limited staff and resources, thereby disrupting its ability to provide due attention to its primary government functions as well as further delaying BCHD’s responses. BCHD’s public purpose is not well served by diverting its personnel from their normal duties of serving the public to the time-consuming task of searching for and reviewing potentially thousands of ill-defined documents on a disparate array of topics. BCHD is a small public agency with a relatively small staff and is operating under emergency protocols due to the COVID-19 crisis. Pursuant to Government Code Sections 6254(a), (c), and (k) (and possibly other subsections), Government Code Section 6255 and the case law in California that establishes that a public agency “*is only obliged to disclose public records that can be located with reasonable effort and cannot be subjected to a ‘limitless’ disclosure obligation.*” *Bertoli v. City of Sebastopol* (2015) 233 Cal.App.4th 353, 372, quoting *American Civil Liberties Union Foundation v. Deukmejian* (1982) 32 Cal.3d 440, 447. Nevertheless, BCHD has, in its discretion and not as a legal obligation, endeavored to produce responsive non-exempt documents as they can be reasonably identified from these requests within the reasonable capabilities of BCHD staff. BCHD has been willing to work cooperatively to narrow the scope of the overly broad California Public Records Act requests so that the search can be focused on documents that are identifiable and can be produced with reasonable effort. The timing of BCHD to produce any more documents notwithstanding the undue burden imposed on BCHD inevitably took an extended period of time.

The comment also incorrectly states only three days of public review were allowed prior to approval. Contrary to the assertions in this comment, BCHD has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

Comment MN18-2

The comment claims that BCHD has demonstrated lack of planning and risk management and that, like the South Bay Hospital District, BCHD is a poor fiduciary to the taxpayer-owners. This comment does not address the adequacy of the EIR with regard to the environmental impact

analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN19

April 5, 2021
Mark Nelson

Comment MN19-1

The comment asserts, without substantial evidence or expert opinion, that the Environmental Impact Report (EIR) has not considered the effects of chronic stress impacts. The comment claims that the definition and quantification of negative impacts, including those relating to economic and environmental justice, must be reviewed, utilizing “government sources.” It should be noted that CEQA Guidelines 15131 specifically states “[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

The comment goes on to make unsupported claims that the proposed Project like the operation of the existing campus, would have negative environmental justice impacts to the surrounding neighborhoods: related to:

- excess traffic-induced safety hazards,
- excess traffic-induced ground level tailpipe pollution,
- excess delivery vehicle diesel fuel emissions,
- excess emergency vehicle noise, excess window glare,
- excess shading caused by tall buildings on a 30 foot hill,
- excess heat islanding impacts,
- excess night lighting from parking lot lighting,
- excess night lighting from signage,
- excess noise from night time maintenance vehicles and operations,
- excess crime (construction periods are well understood to increase crime rates),
- excess crime (BCHD periodically has un-housed living on the Flagler side),

- excess crime (BCHD Flagler alley is frequented by the un-housed and transients),
- excess fugitive dust and emissions from construction,
- excess noise from construction,
- excess asbestos risk from construction,
- excess water runoff,
- reduced visual privacy,
- increased cardiovascular risk from noise,
- increased chronic stress (Bluezone's "silent killer"), and
- impaired cognitive function.”

The EIR addresses the physical environmental impacts of the proposed Project as required by the CEQA Guidelines. Additionally, EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.) Each of the conclusions provided in the EIR – including the disclosure of the significant and unavoidable construction-related noise impacts – is supported by substantial evidence, technical studies, and/or exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge the thresholds, methodologies, or findings of this analysis. Additionally, the claim that the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

The comment then provides various citations to articles and studies relating to stress, noise, and nighttime lighting but none of the referenced citations conflict with or challenge any specific aspects of the EIR analysis. For example, none of the articles: *Maximize Health and Longevity Using These Stress Management Strategies*, *How Stress Makes Us Sick and Affects Immunity*, *Inflammation, Digestion*, nor *The Effects of Chronic Stress on Health: New Insights Into the Molecular Mechanisms of Brain-body Communication*, address or provide a clear relationship to construction or operation of the proposed Project.

Letter MN20

April 6, 2021
Mark Nelson

Comment MN20-1

The comment describes that the comments contained in the letter serve as a rebuttal to statements by the Beach Cities Health District (BCHD). These comments are addressed in the responses to Comment MN20-2 through MN20-6 below.

Comment MN20-2

The comment claims the proposed Project is larger and taller than previous design iterations. Refer to the response to Comment MN4-1 as well as Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

Comment MN20-3

The comment asserts that the Environmental Impact Report (EIR) lacks a stable, accurate, and finite project description and claims that the BCHD campus and the proposed Project would result in environmental impacts. As described in the response to Comment MN11-1, Section 2.0, *Project Description* meets the requirements of California Environmental Quality Act (CEQA) Guidelines Section 15124. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic description and programmatic analysis of the Phase 2 development program.

Additionally, the claim that the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

Comment MN20-4

The comment critiques BCHD's budgetary evaluation system. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Comment MN20-5

The comment expresses grievance with BCHD's fulfillment of California Public Records Act requests and incorrectly states only 3 days of public review were allowed before Project approval. Refer to the response to Comment MN18-1. As described therein, contrary to the assertions in this comment, BCHD has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be

considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

Comment MN20-6

The comment claims, without substantial evidence or expert opinion, that the proposed Project ignores negative impacts to the surrounding community including chronic stress, noise, traffic, pollution, and sirens. The comment asserts that the surrounding communities have suffered environmental and economic justice impacts since the operation of the South Bay Hospital District and the existing Beach Cities Health District. Refer to the response to Comment MN19-1. Again, it should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

Letter MN21

April 6, 2021
Mark Nelson

Comment MN21-1

The comment expresses concern that the proposed Project would cause premature Alzheimer's disease in children and emit harmful emissions, specifically fine particulate matter (PM_{2.5}). The comment provides several citations to studies and news articles related to air pollution and adverse health effects on children. However, the references provided in this comment do not support a conclusion that construction or operational emissions of the proposed Project would result in health impacts. For example, as described in the response to Comment FL1-61, which cited the same study the study *The associated of early-life exposure to ambient PM_{2.5} and later-childhood height-for-age in India: an observational study* describes that children in the sample were exposed to an average of 55 micrograms per cubic meter (µg/m³) of PM_{2.5} in their birth month. For reference, the construction health risk assessment (HRA) prepared for the proposed Project demonstrates that the maximum unmitigated concentration of PM_{2.5} would be 0.41021 µg/m³, whereas the maximum mitigated concentration would be 0.02373 µg/m³. These emissions, which would occur temporarily during the Phase 1 construction activities, would represent the maximum PM_{2.5} emissions that could be experienced during construction or operation of the proposed Project. Similarly, the study *Severe Urban Outdoor Air Pollution and Children's Structural and Functional Brain Development, From Evidence to Precautionary Strategic Action*, which was also reference in Comment FL1-61, cites a World Health Organization (WHO) safety cut off of <10 µg/m³. Neither construction-related nor operational emissions of PM_{2.5} would approach these values.

None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction HRA prepared for the proposed Project.

Letter MN22

Comment MN22-1

The comment provides links to the State of California Department of Justice website which provides brief descriptions of the California Environmental Quality Act (CEQA) and Environmental Justice. A link to a search bar on the State of California Department of Justice website for the term economic justice is also provided. A link to Environmental Justice at the Local and Regional Level Legal Background Factsheet and a link to a page on CalRecycle’s website titled *Contents of an Environmental Impact Report* is also provided. The comment claims neighborhoods to the north of the Project site are younger, lower income and are being exploited by the Beach Cities Health District (BCHD) because as renters, they are less likely to be able to mount an effective opposition. The comment goes on to claim, without substantial evidence or expert opinion, that BCHD has weaponized environmental justice.

First, CEQA Guidelines 15131 specifically states “[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

However, it should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice. Refer to Master Response 16 – Environmental Justice.

Letter MN23

April 6, 2021
Mark Nelson

Comment MN23-1

The comment expresses the commenter’s opinion there is a lack of net positive benefits to override significant impacts from aesthetics, noise, and loss of recreation. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining the

benefits of the proposed Project. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. All other impacts identified in the Environmental Impact Report (EIR) were determined to be either less than significant or less than significant with mitigation.

Comment MN23-2

The comment presents written communication from Beach Cities Health District (BCHD) legal counsel and asserts, without substantial evidence, that BCHD misrepresents the benefits of the proposed Project given that the Draft EIR was ongoing and had not yet been published. It should be noted that the purpose of the EIR is to disclose the potential physical environmental impacts associated with the proposed Project to foster public participation and informed decision making. The identification of project benefits does not subvert the California Environmental Quality Act (CEQA) process. In fact, it is called for in CEQA Guidelines Section 15124, which states that “[t]he statement of objectives should include the underlying purpose of the project and may discuss the project benefits.”

The comment continues by asserting that the City of Redondo Beach would experience 100 percent of the environmental justice impacts. As described in the response to MN17-1, the market study prepared for the proposed Project identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD’s broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. It should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

Comment MN23-3

The comment claims that the MDS Market Study estimates are flawed and unsubstantiated. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

The comment goes on to assert that BCHD has displayed diffidence and defiance to providing responses to California Public Records Act requests. Refer to the response to Comment MN18-1 as well as Master Response 15 – Purpose of Public Review.

Comment MN23-4

The comment offers a description of the history of the formation of BCHD, which was originally formed as the South Bay Hospital District, a voter-approved public hospital district. The comment goes on to claim that neither BCHD’s mission nor operations have been voter-approved by the three Beach Cities. Again, this comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment MN23-5

The comment asserts that the Primary Market Area identified in the MDS Market Study “far exceeds” BCHD’s service area. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. However, the analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the PACE and Youth Wellness Center in Phase 1 or the CHF, Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD’s broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

The comment then goes on to provide a series of fragmented quotes from the MDS Market Study and claims these represent an “overview of missing information related to key claims by MDS.” However, the comment fails to specify how these quotes represent flaws in the study.

Comment MN23-6

The comment asserts that the MDS Market Study “implied” environmental and economic justice impacts in the 90277 zip code. The comment first states that the MDS Research Company, Inc. study assumes less than 5 percent of the Assisted Living residents would be from south Redondo Beach area, which would experience 100 percent of the environmental justice impacts. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. As described in Comment Response MN23-5, the analysis identifies that a large majority (i.e., 70 percent) of the

proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD’s broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

The comment then describes that the south Redondo Beach area has experienced cumulative environmental justice impacts associated with the AES Redondo Beach Power Plant as well as the BCHD campus. The comment does not present a clear relationship or describe the nexus of the of impacts associated with the AES Redondo Beach Power Plant and the proposed Project. As previously described it should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. Additionally, it should be noted that the claim the Project site is located within an environmental justice community is unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

With regard to the claim that BCHD’s actions have resulted in economic justice impacts, it is important to note that CEQA requires that the environmental impact analysis “identify and focus on the significant environmental effects of a proposed project” (CEQA Guidelines Section 15126.2[a]). CEQA Guidelines Section 15382 defines “significant effect on the environment” as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.” CEQA Guidelines Section 15131, also specifically states “[e]conomic or social effects of a project shall not be treated as significant effects on the environment.”

Comment MN23-7

This comment summarizes statements made previously regarding the scope of the Primary Market Area used in the MDS Market Study and the accuracy of the report. The comment again asserts that BCHD has not provided responses to previous California Public Records Act requests. Refer to the response to Comment MN18-1 as well as Master Response 15 – Purpose of Public Review.

Comment MN23-8

The comment again asserts that the 90277 zip code would be forced to endure 100 percent of the environmental and economic justice impacts of the Project, while receiving less than 5 percent of

the benefits. Refer to the individual responses to Comment MN23-2, Comment MN23-5, and Comment MN23-6.

Letter MN24*Comment MN24-1*

The comment questions when receipts for received comments will be received and if they will be posted as they are received. It should be noted that Beach Cities Health District (BCHD) established an automated reply to notify commenters that their comment has been received. Many commenters note having received such an automated reply in their comments. Additionally, all comments received during the review periods for the Notice of Preparation NOP and the Draft Environmental Impact Report (EIR) are published on the BCHD website here: <https://www.bchdcampus.org/eir>. Since their publication, BCHD has not received communication that a comment has been omitted or discarded.

Letter MN25

April 6, 2021
Mark Nelson

Comment MN25-1

The comment states the issues within the letter reflect areas of known controversy and environmental justice impacts, negative health impacts, and Beach Cities Health District's (BCHD's) communication with the public. The individual issues are addressed in Comment MN25-2 through MN25-36.

Comment MN25-2

The comment states that the issues contained within the letter have been submitted to the BCHD Board of Directors, Torrance and Redondo Beach City Councils as public comment for their next meetings, and Torrance and Redondo Beach Planning Commissions. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration.

Comment MN25-3

The comment states the submitted comments have been made before during Community Working Group (CWG) meetings. This comment has been received, incorporated into the Final EIR as a

part of the responses to comments, and will be advanced to decision makers for further consideration.

Comment MN25-4

The comment states the proposed Project must be described in detail, including project phases, timing, and linkage with other parts of the BCHD campus. The comment also incorrectly states that impacts cannot be determined without understanding of pricing and subsidy policies.

The EIR was prepared pursuant to the California Environmental Quality Act (CEQA) Guidelines and includes thorough, detailed analysis of the proposed Project and physical environmental impacts on various resources, including impacts on air quality, noise, land use compatibility, and hazards and hazardous materials. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion and response to comments regarding the level of detail and adequacy of the described Phase 2 development program.

For issues related to pricing Refer to Master Response 4 – Affordability of the RCFE Assisted Living and Memory Care Units as well as Master Response 6 – Financial feasibility/Assurance. However, it should be noted that while CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to do so if the information “...*does not supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about environmental information, is reaffirmed by the courts (Sierra Club v. County of Napa (2004) 121 Cal.App.4th 1490, 1503).

Comment MN25-5

The comment states that alternatives to the proposed Project have been only briefly discussed during CWG meetings. The comment claims that the alternatives discussed during the CWG meetings involved land leases, but provides no clarifying details. The description and analysis of alternatives provided in Section 5.0, *Alternatives* meets all requirements set forth in CEQA Guidelines Section 15126.6, which describes:

“An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project

alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

Comment MN25-6

The comment states CWG meetings have had limited discussion of the No Project Alternative and requires significant explanation. Refer to the individual response to Comment MN25-6. The discussion and the analysis of the No Project Alternative meets all requirements set forth in CEQA Guidelines Section 15126.6(e).

Comment MN25-7

The comment notes that the proposed Project would involve some different uses and operations than currently provided and requests a discussion of purpose and need of the proposed Project be provided, including a discussion regarding revenue generation and affordability associated with the Assisted Living facility. Refer to BCHD Master Response 3 – Project Need and Benefit for analysis of the need and anticipated benefit of development of the proposed Project. As discussed in Master Response 4 – Project Objectives, the Project objectives directly reflect BCHD’s primary mission to support community health and wellness by providing needed housing and long-term care to seniors as well as generating revenue to support BCHD’s broader range of community health programs and services. Refer to BCHD Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to concerns pertaining to the affordability of Assisted Living and Memory Care units.

Comment MN25-8

The comment expresses concern regarding impacts to aesthetics and visual resources related to mass, height, setbacks, artificial lighting, sun reflection, and invasion of the visual privacy of the surrounding homeowners. The comment states simulations, elevations, illustrations, and models would be needed. The EIR provides photosimulations and six representative views in Section 3.1, *Aesthetics and Visual Resources*. The EIR also provides visual renderings of example site plans used to illustrate the Phase 2 development program. Both the photosimulations for Phase 1 as well as the visual renderings for Phase 2 were prepared by licensed architects. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Comment MN25-9

The comment expresses general concerns, without substantial evidence or expert opinion, regarding operational emissions effects on nearby receptors and requests analysis of operational emissions. The comment also expresses general concerns, again without substantial evidence or expert opinion, for hazardous emissions associated with construction-related traffic and demolition (e.g., particulate matter and asbestos containing material, fugitive dust, etc.) and requests management strategies be implemented during construction. These issues are addressed in detail in Sections 3.2, *Air Quality* and Section 3.8, *Hazards and Hazardous Materials*. This analysis is supported by technical studies and exhaustive quantitative modeling, including the preparation of a construction Health Risk Assessment (HRA) as well as Phase I and Phase II Environmental Site Assessments (ESAs) and follow-up investigations. Refer to Master Response 9 – Air Quality Analysis and Master Response 11 - Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

Mitigation Measure (MM) AQ-1 would require that BCHD prepare and implement an Air Quality Management Plan during all construction-related activities MM HAZ-1 would require BCHD to retain a licensed contractor(s) to conduct a comprehensive survey of asbestos-containing material (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mold, including invasive physical testing within the buildings proposed for demolition activities. Additionally, the implementation of MM HAZ-2a through HAZ-2d would ensure that tetrachloroethylene (PCE) and the other identified volatile organic compounds (VOCs) are properly detected and managed during ground disturbing activities consistent with all applicable Federal and State regulations and guidelines provided by relevant regulatory agencies.

Comment MN25-10

The comment asserts the EIR must consider potential attack and disease from urban wildlife such as coyotes, raccoons, opossums, rats, mice, raptors, feral cats, nuisance animals and insects. Issues related to rodents are discussed in the EIR, which notes that “...*due to the presence of the Silverado Memory Care Community and associated dining services on the BCHD campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus.*” However, the comment provides no substantial evidence to suggest that the implementation of the proposed Project would credibly result in attack or disease by urban wildlife. Nevertheless, all on-site landscaping with the perceived potential to attract urban wildlife would be subject to review, input, and approval by the Redondo Beach Building & Safety Division as well as the Torrance Community Development Department for landscaping elements within the City of Torrance right-of-way.

Comment MN25-11

The comment expresses general concern regarding long-term energy generation and potential emission hazards or voltage fluctuations. The comment also expresses concern regarding diesel fuel used during construction. As assessed in Section 3.5, *Energy*, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Further, as described in Section 2.5.1.5, *Sustainability Features*, it should be noted that all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). The design of the proposed Residential Care for the Elderly (RCFE) Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed new buildings would meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification. LEED is a national certification system developed by the U.S. Green Building Council (USGBC) to encourage the construction of energy and resource-efficient buildings that are healthy to live in. LEED certification is the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. The program promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

Detailed discussion and analysis of potential impacts on air quality is presented in Section 3.2, *Air Quality*. As presented therein, based on exhaustive modeling of construction and operational emissions following approved methodologies adopted by local air quality management agencies, the proposed Project, with implementation of identified mitigation measures, would not generate air quality emissions that would create or contribute to the violation of air quality standards, which are established by Federal and State agencies for protecting the quality of the air and the health of residents of the air basin. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to potential air quality impacts.

Comment MN25-12

The comment states that a standard analysis of geotechnical issues should suffice for the proposed Project. Existing geologic and soils hazards at the Project site, including but not limited to liquefaction, landslides, slope instability, subsidence, and differential settlement, were thoroughly assessed based on the Geotechnical Report prepared by Converse Consultants (2016) and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation, and

California Emergency Management Agency (Cal EMA). The issue of geologic hazards is discussed in detail in Section 3.6, *Geology and Soils* under Impact GEO-1.

Comment MN25-13

The comment claims, without substantial evidence or expert opinion, that there may be impacts created by alternative energy generation such as noise or impacts to wildlife from wind turbines or glare and heat islanding from solar panels. The comment requests that plans are disclosed for greenhouse gas (GHG) mitigations. The EIR includes adequate discussion of the construction and operational GHG emissions in Section 3.7, *Greenhouse Gas Emissions and Climate Change* under Impact GHG-1. As shown in Table 3.7-6 and 3.7-7 of the EIR, the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. As such, the proposed Project would not generate GHG emissions that may have a significant impact on the environment.

As described in Section 2.5.1.5, *Sustainability Features*, the proposed Project would incorporate the following sustainable design features:

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

Regarding effects from solar panels, the solar panels would be located atop of multi-story buildings and would largely be removed from view of the surrounding area. Additionally, any issues related

to glare would be considered during Planning Commission Design Review pursuant to Redondo Beach Municipal Code (RBMC) Section 10-2.1806. With regard to potential heat island effects, the comment provides no substantial evidence or expert opinion to suggest that could result in a significant impact associated with the proposed Project. Nevertheless, it should be noted that the proposed Project would include a substantial increase in open space that would provide an overall increase in trees and landscaping onsite and would reduce any potential exiting heat island effects associated with the existing concrete and asphalt surfaces on the Project site.

Comment MN25-14

The comment requests disclosure of impacts related to hazards and hazardous materials. These issues are fully assessed in Section 3.8, *Hazards and Hazardous Materials*. Refer also to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment MN25-15

The comment expresses concern regarding hydrology (e.g., water capture, runoff, and irrigation) impacts, particularly during construction and requests disclosure. These issues are sufficiently analyzed and discussed in Section 3.9, *Hydrology and Water Quality* with analysis supported by hydrology and drainage studies prepared by licensed civil engineers. The comment does not challenge any specific thresholds, methodologies, or findings of this analysis.

Comment MN25-16

The comment states a clear understanding of land use is need for the proposed Project as well as the alternatives to the proposed Project. The comment suggests a local vote for any changes in land use from previous use. Refer to the response to Comment MN25-5 and MN25-6 for issues regarding the description and analysis of alternatives provided in Section 5.0, *Alternatives*. Additionally, as described in Section 3.10, *Land Use and Planning*, the campus is designated P (Public or Institutional) land use within the Redondo Beach General Plan. The P designation includes lands that are owned by public agencies, special use districts, and public utilities. Permitted uses under the P land use designation include governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (i.e., schools), cultural (e.g., libraries, museums, performing and visual arts, etc.), human health, human services, public utility easements, and other public uses. The proposed Project would expand existing human health, human services, and recreational facilities which are consistent with the P land use designation and would continue to serve the public. Section 3.10, *Land Use and Planning* provides a detailed analysis of issues related to land use and an assessment of consistency with

applicable land use planning goals, policies, and regulations that govern the use and development of the Project site. Refer also to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

Comment MN25-17

The comment claims, without substantial evidence, that operational noise of the existing BCHD campus is substantial and expresses concern regarding construction and operation-related noises of the proposed Project. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to noise.

Comment MN25-18

The comment references an outdated number for beds under proposed Assisted Living units and requests an assessment of impact to traffic and ancillary services under the proposed Project. The EIR includes analysis under CEQA for community services and population and housing, including Section 3.12, *Population and Housing*, Section 3.13, *Public Services*, Section 3.15, *Utilities and Service Systems*, and Section 4.0, *Other CEQA Considerations*. Refer also to Section 3.14, *Transportation*.

Comment MN25-19

The comment requests a private security description be provided and analyzed by local police departments and the Redondo Beach Police Department (RBPD). The comment also requests analysis of impacts to public utility services.

With regard to security, the EIR includes a thorough assessment of potential for the proposed Project to affect law enforcement public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local police protection services. As described Section 3.13, *Public Services* under Impact PS-2, the increase in activity level at the Project site could generate the need for law enforcement services. However, the development under Phase 1 and Phase 2 of proposed Project would include the incorporation of security features such as access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas, and minimum dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of RBMC Section 10-5.1706(c)(10). These measures would be effective in deterring criminal activity at the Project site so any increase in crime would not be substantial. Analysis of public utilities is provided in Section 3.15, *Utilities and Service Systems*.

Comment MN25-20

The comment claims the former South Bay Hospital resulted in overflow parking conditions and claims, without substantial evidence, that the existing BCHD campus results in unsafe traffic conditions. The comment suggests the modification of the existing transportation system. Section 3.14, *Transportation* provides a thorough discussion of transportation hazards, supported by transportation studies prepared by Fehr & Peers. As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project. The analysis did not identify any discernable pattern in collisions to suggest that operations at the BCHD cause unsafe traffic conditions. Additionally, Fehr & Peers did not identify any hazardous conditions associated with the circulation scheme included in the proposed Project.

Comment MN25-21

The comment expresses appreciation for the opportunity to participate in public review of the proposed Project. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers

Comment MN25-22

The comment expresses general opposition to the proposed Project, noting the height of the proposed development would be taller than structures of the surrounding neighborhood. The comment expresses concern that the height of the proposed development would block views and create privacy issues. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height, visual character, and privacy.

Comment MN25-23

The comment makes unsubstantiated claims that the former South Bay Hospital district imposed environmental and economic damages over a 60-year period. The comment notes the former South Bay Hospital District was approved and funded by public vote and did not include assisted living or similar uses. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment MN25-24

The comment makes unsubstantiated claims that the former South Bay Hospital district imposed environmental and economic damages over a 60 year period. The comment claims that in favor of economic and environmental justice, the proposed Project must not be operated. The comment further asserts BCHD must stop environmental and economic justice damages, including reduced property values, imposed on the surrounding neighborhoods. As described in Section 3.0, Environmental Impact Analysis and Mitigation Measures, CEQA requires an EIR analysis “identify and focus on the significant environmental effects of a proposed project” (CEQA Guidelines 15126.2[a] and Public Resources Code Section 21000[a]). CEQA Guidelines Section 15382 defines “significant effect on the environment” as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment. Accordingly, the EIR analyzes the potential “physical” adverse effects of a project. (14 CCR 15358[b]). Property value loss in and of itself is not a physical impact required to be included in a CEQA analysis. Further, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. See Master Response 16- Environmental Justice for further detail.

Comment MN25-25

The comment asserts there is no need for BCHD to provide the proposed Assisted Living program as other private entities will meet this demand. The comment asserts BCHD’s motivation for providing assisted living facilities is to fund future BCHD programs with unknowns and speculative benefits. The comment states the proposed Project must comply with the Declaration of Helsinki principles of ethics and morality. Refer to Master Response 3 – Project Need and Benefit for analysis of the need and anticipated benefit of development of the proposed Project. Refer also to Master Response 4 – Project Objectives for a detailed discussion on the relationship of the project objectives with BCHD’s primary mission to support community health and wellness by providing a broad range of community health programs and services. The Declaration of Helsinki is a statement of ethical principles for medical research involving human subjects, addressed primarily to physicians but encouraged by use for others involved in such research. The proposed Project would provide housing and care to seniors and would not involve medical research or experimentation with human subjects; therefore, the Declaration of Helsinki is not applicable, neither to the proposed Project, nor the CEQA-compliant analysis.

Comment MN25-26

The comments states, without substantial evidence, that the implementation of the proposed Project would inflict chronic stress, noise, traffic, particulate matter pollution environmental and economic justice damages on the surrounding neighborhoods. The comment asserts the proposed Project would be immoral according to the Declaration of Helsinki principles. The comment further asserts that the proposed Project must gain public consent before implementation.

Again, the comment fails to provide substantial evidence that would support the assertion that the proposed Project would inflict chronic stress impacts. The comment fails to acknowledge that each of these remaining issues raised in this are addressed in detail within the EIR, with analysis supported by technical studies and exhaustive quantitative modeling prepared by experts in their field. which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. it should be clarified that the EIR identifies one significant and unavoidable noise impact (refer to Impact NOI-1) that would occur for the duration of construction of both phases of the proposed Project, all other resource areas assessed in the EIR determined that impacts would either be less than significant or less than significant with mitigation measures.

As previously described, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue. Regarding Declaration of Helsinki principles, refer to the response to Comment MN25-25.

Comment MN25-27

The comment claims there is no need for BCHD to provide Assisted Living facilities as, other private entities will meet this demand. The comment further asserts the proposed Project would not create benefits and would have a negative environmental justice impact. These issues are addressed in the response to Comment MN25-25. As previously described, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to Master Response 16 –Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN25-28

The comment asserts the existing BCHD campus creates imposes environmental and economic justice impacts on surrounding neighborhoods. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to

Master Response 16 –Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN25-29

The comment states a facility of similar size to the Kensington Redondo Beach would be adequate to serve the Beach Cities. This comment reflects the commenter’s opinion and is not supported by substantial evidence or expert opinion. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

Comment MN25-30

The comment states historic operation of the former South Bay Hospital District has created chronic stress impacts to surrounding residents for over 60 years, potentially leading to numerous adverse health effects. However, the comment fails to provide substantial evidence that clearly and directly demonstrates the operation of the former South Bay Hospital District has caused such adverse effects to surrounding neighborhoods. The comment further asserts demolition, construction, and operational activities under the proposed Project would create chronic stress from traffic, noise, pollutants, and psychological stress impacts. The comment’s implication that BCHD and the proposed Project would result in chronic stress on the surrounding community during Project construction and operation is unreferenced and unfounded. The comment fails to provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR.

Comment MN25-31

The comment states the proposed Project would have severe traffic-related impacts. Refer to Master Response 13 – Transportation Analysis for additional discussion regarding the EIR’s analysis of transportation impacts and mitigation measures proposed to reduce such impacts.

Comment MN25-32

The comment states vehicle emissions and fugitive dust associated with construction and operation of the proposed Project would create adverse health effects to children and residents, especially the chronically ill. See BCHD Master Response 10 – Air Quality Analysis for discussion on air quality impacts, including on sensitive receptors and mitigation measures that would reduce impacts to a level below significance.

Comment MN25-33

The comment states the proposed Project would have severe impacts related to construction and operational noise and vibration. Construction and operational noise is thoroughly discussed in Section 3.11, *Noise* under Impact NOI-1 and Impact NOI-3. This analysis is supported by an extensive quantitative modeling effort. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to this issue.

Comment MN25-34

The comment states the proposed Project would have severe impacts related to privacy invasion from the proposed RCFE Building. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to concerns regarding the aesthetic and visual impacts of the Project, including privacy concerns. As described therein, while residential areas would still be visible from some areas of the BCHD campus after development of the proposed Project, the vertical and horizontal distance from the campus and its proposed buildings would be greater than 114 feet from the uppermost floor of the RCFE Building to the nearest off-site residences to the east and across Beryl Street to the north. The RCFE Building would provide wide-ranging views of the South Bay including Palos Verdes Peninsula and the Santa Monica Mountains Ocean, but it would not create clear, direct sight lines into private interior living spaces of nearby residences due to the distance and high angle of the views.

Comment MN25-35

The comment states the proposed Project would have severe aesthetic impacts related to blocked views and outdoor lighting. These issues are analyzed in detail in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding the aesthetic and visual impacts of the Project, including compatibility of the Project design and height with the visual character of the surrounding neighborhood, views of the Palos Verdes Hills, skyline views, and glare and lighting.

Comment MN25-36

The comment claims, again without substantial evidence, that the surrounding neighborhoods have endured environmental and economic justice impacts from operation of the former South Bay Hospital and existing BCHD campus. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue. The comment states implementation of the proposed

Project would substantially reduce the quality of life for surrounding residents. The comment further asserts because local neighborhoods were not provided the quid pro quo for informed consent the proposed Project is unethical according to the Declaration of Helsinki and expresses opposition towards the proposed Project. Refer to Comment MN25-25 for a discussion on non-applicability of the Declaration of Helsinki to the proposed Project and the CEQA process.

For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MN26

April 11, 2021
Mark Nelson

Comment MN26-1

The comment requests written evidence regarding seismic hazards of the Beach Cities Health Center. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue.

Letter MN27

April 13, 2021
Mark Nelson

Comment MN27-1

The comment references a sign in the Beach Cities Health Center that describes the number of votes for and against funding the South Bay Hospital District in 1956 and asserts that the Beach Cities Health District (BCHD) misinterprets the data in order to mislead the public. This comment does not address to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment MN27-2

The comment asserts that there were 120 height-related comments and 73-construction duration-related comments on the Project (assuming during the public scoping period, although this is not specified in the comment). As described in detail in Master Response 9 – Aesthetics and Visual Resources, several community concerns were weighed when designing the Project site plan analyzed in the EIR, including building height, density of development, the proximity of the

proposed development to adjacent single- and multi-family residential land uses, views of the proposed buildings from the surrounding residential neighborhoods, and the duration of construction as well as potential impacts related to air quality, hazards and hazardous materials, noise, and construction vehicle traffic given the adjacency of the Residential Care for the Elderly (RCFE) Building to the single-family neighborhood to the east within the City of Torrance. The comment fails to acknowledge that while many public scoping comments did not directly specify the construction duration, BCHD's decision to shorten the construction duration substantially reduced associated construction-related impacts, including impacts related to air quality, hazards and hazardous materials, noise, and construction vehicle traffic.

Comment MN27-3

The comment claims that the EIR does not assess a maximum elevation on West 190th Street. With regard to maximum elevation views along West 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190th Street that provide slightly elevated views – including the intersection of Prospect & West 190th Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource.

Comment MN27-4

The comment asserts that BCHD must develop noise barriers that are at least as tall as those for the Legado Redondo development although the comment does not specify the height of the referenced noise barriers. As described in detail under Impact NOI-1 in Section 3.11, *Noise*, the feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership. Noise barriers are most commonly developed to a height of between 10 and 30 feet. Mitigation Measure (MM) NOI-1 requires the preparation of a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division and the Torrance Building & Safety Division for activities occurring within the City of Torrance right-of-way. The specific height of the noise barriers would be finalized in coordination with these entities.

Comment MN27-5

The comment asserts that no codes or ordinances require demolition of the Beach Cities Health Center. As described in Master Response 3 – Project Need and Benefit, BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill

(SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate) does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential public safety hazard for future building tenants, patients, and residents, the BCHD Board of Directors prioritized elimination of seismic-related hazard in concert with the proposed redevelopment of the Healthy Living Campus.

Comment MN27-6

The comment claims that only 0.3 percent of the Beach Cities Health Center is 75 feet tall, while the majority of the building is between 32 and 35 feet. The EIR accurately describes the varying heights of different portions of the building in Section 2.2.3, *Existing Project Site*. As discussed therein, “[t]he north low rise portion of the building is 1 story tall, the north tower is 4 stories tall (plus the equivalent of a 2-story rooftop projection), and the south tower is 5 stories tall (plus the equivalent of a 1-story rooftop projection), with a parapet structure (i.e., elevator shaft) reaching up to a height of 76 feet above the campus ground level and 112.5 feet above the vacant Flagler Lot below.”

Comment MN27-7

The comment describes the height and square footage of various iterations of the Project site plans. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

Comment MN27-8

The comment claims that “it is safe to conclude that comments during the business 3 days between June 12 and 17th did not include increasing the height and above ground sqft of the proposed campus - and - BCHDs outcome therefore ignores public input.” The BCHD Board of Directors has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

Comment MN27-9

The comment states that the MDS Research Company, Inc. study assumes less than 5 percent of the Assisted Living residents would be from the south Redondo Beach area, which the comment claims has suffered 60 years of negative impacts from the former South Bay Hospital District and BCHD operations. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed

Project. As described in Comment Response MN23-5, the analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

Comment MN27-10

The comment asserts that residents of the City of Redondo Beach are expected to comprise 8 percent of the tenants of the proposed Assisted Living units and Memory Care units and that the net benefits are negative. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project.

Comment MN27-11

The comment suggests that there is no evidence that the benefits of the Project to the three Beach Cities outweighs the construction and operational impacts and that any benefits to residents of Manhattan Beach and Hermosa Beach are irrelevant to the issuance of a Conditional Use Permit by either the City of Redondo Beach or the City of Torrance. Refer to Master Response 3 – Project Need and Benefits, which provides a detailed discussion and response to comments pertaining to the proposed benefits of the Project.

Comment MN27-12

The comment claims that BCHD proposes a commercially developed and financed project with high-profit, market-based rents in order to avoid a public vote. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, Master Response 6 – Financial Feasibility/Assurance, and Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

Comment MN27-13

The comment asserts that the proposed Project is misrepresented and likely to fail given a lack of benefits compared to impacts. The comment again claims that the 90277 zip code area has experienced disproportionate impacts as compared to the benefits for both 90277 and all of Redondo Beach together. The comment continues by demanding a plan of restitution and an increase in local benefits to the neighborhoods surrounding the Project site as well as the entirety

of Redondo Beach. Refer to Master Response 3 – Project Need and Benefits, which provides a detailed discussion and response to comments pertaining to the proposed benefits of the Project.

Letter MN28

April 14, 2021
Mark Nelson

Comment MN28-1

This comment letter contains a link to a video that offers a series of alternative locations to be considered as representative view locations than the six representative view locations included in the EIR. Refer to Master Response 9 – Aesthetics and Visual Resources for a description of how and why the representative views were selected. As provided in California Environmental Quality Act (CEQA) Guidelines Section 15204, “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*”

Letter MN29

April 16, 2021
Mark Nelson

Comment MN29-1

This comment provides a link to a video of Beach Cities Health District (BCHD) Chief Executive Officer (CEO) Tom Bakaly explaining that BCHD has a moral obligation to eliminate seismic safety and other hazards of the former South Bay Hospital Building. The comment then goes on to list a series of hypothetical questions regarding BCHD’s moral obligation to protect the people. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

As a matter of approach throughout the EIR and consistent with California Environmental Quality Act (CEQA) Guidelines 15064.7, the thresholds of significance discussion for each of the environmental issue areas first considered the questions presented in Appendix G of the CEQA Guidelines. Then any adopted or commonly used thresholds from the City of Redondo Beach and the City of Torrance were considered, given the role of these cities as responsible agencies. Finally, any relevant quantitative thresholds were considered including those published by relevant regulatory agencies, or those used by other local jurisdictions within the Greater Los Angeles Area.

Letter MN30

April 17, 2021
Mark Nelson

Comment MN30-1

The comment references a civil settlement between Wood Environment & Infrastructure Solutions, Inc. and Scottish prosecutors. The comment does not address adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Comment MN30-2

The comment claims the six project objectives lack a foundational basis. Refer to Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to this issue.

Comment MN30-3

The comment claims that because there is no legal requirement for the demolition of the Beach Cities Health Center, the purpose and need of the proposed Project and No Project Alternative lack foundational basis. Contrary to the assertion in the comment, the discussion and the analysis of the No Project Alternative meets all requirements set forth in CEQA Guidelines Section 15126.6(e).

Comment MN30-4

The comment states that the proposed Project is taller and occupies a greater square footage than project designs of the 2019 Master Plan. The comment states the height of the proposed Residential Care for the Elderly (RCFE) Building would create significant aesthetic impacts and notes a previous Legando Redondo development was assessed using average height. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height. As described in the response to Oral Comment MN1-6, the comment claims that the City of Redondo Beach uses average height to determine aesthetics and visual impacts; however, the EIR for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 2013121065) as well as the EIR for The Waterfront (SCH No. 2014061071) review the maximum building height in the context of consistency with the Redondo Beach Municipal Code (RBMC). The analysis of visual character provided in Impact VIS-2 is consistent with this approach.

Comment MN30-5

The comment states the proposed increase in building height would create shading effects to surrounding neighborhoods, recreation areas, and roadways. Refer to Master Comment 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows.

Comment MN30-6

The comment states 85 dBA intermittent noise would have a significant negative impact to receptors at Towers Elementary School. The comment asserts average sound level is not the appropriate metric for analysis. Refer to Master Response 12 – Noise Analysis. It should be noted that as provided in Table 3.11-16 and Table 3.11-17, construction-related noise-levels experienced at Towers Elementary School would not exceed the Federal Transit Authority (FTA) thresholds..

Letter MN31

April 17, 2021
Mark Nelson

Comment MN31-1

The comment states “*Ms. Egan is correct that BCHD should not be electively demolishing the 514 building.*” Refer to the individual response to Oral Comment BE-3.

Letter MN32

April 16, 2021
Mark Nelson

Comment MN32-1

The comment provides an excerpt from a Wall Street Journal Article titled *John Wood to Pay 9-million to Settle with Scottish Prosecutors*. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN33

April 26, 2021
Mark Nelson

Comment MN33-1

The comment claims that the market study prepared by MDS Research Company, Inc. and peer reviewed by Cain Brothers is biased due to financial incentives from Beach Cities Health District (BCHD). The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN34

April 26, 2021

Mark Nelson

Comment MN34-1

The comment claims that the Beach Cities Health District (BCHD) held secret negotiations with the City of Redondo Beach. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review. The comment also claims that BCHD approved their own Project. The BCHD Board of Directors has not approved the proposed Project. It should also be noted that certification of a Final EIR by the lead agency as having been prepared in compliance with CEQA does not grant any approvals or entitlements for a project. Accordingly, the proposed Project will be considered by the BCHD Board of Directors as a separate action(s) following certification of the Final EIR.

Comment MN34-2

The comment claims that the BCHD allowed only three business days of public review and comment prior to approval by the BCHD Board of Directors. Refer to the response to Comment MN34-1, the BCHD Board of Directors has not approved the proposed Project.

Comment MN34-3

The comment claims that the proposed Project has increased in size since the 2019 site plan was released to the public. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of previous revisions to the proposed Healthy Living Campus Master Plan.

Comment MN34-4

The comment again claims that BCHD negotiated in secret with the City of Redondo Beach, in order to change the land use designations and avoid a public hearing for a Conditional Use Permit

(CUP). It should be noted that the proposed Project does not involve any land use changes. The requirement for a CUP is clearly described in Redondo Beach Municipal Code (RBMC) Section 10- 2.1110. Additionally, the need for a CUP is listed under Section 1.5, *Required Approvals*.

Comment MN34-5

The comment expresses concern regarding the affordability of the assisted living units and claims that Redondo Beach residents would bear the brunt of environmental justice impacts. Refer to Master Response 3 – Project Need and Benefit, Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units, and Section 16 – Environmental Justice.

Comment MN34-6

The comment claims that BCHD has acted unethically and requests that no zoning change be permitted for the proposed Project. Refer to the response to MN34-4 as well as Master Response 7 – Project Compatibility with P-CF Zoning Land Use Designation.

Letter MN35

April 28, 2018
Mark Nelson

Comment MN35-1

The comment raises concerns about exposure to noise and cites a study prepared by Willy Passchier-Vermeer and Wim F. Passchier regarding long-term noise exposure and associated health effects. Specifically, this study considered long-term exposure (i.e., for a period of over one or more years) to occupational and operational sources of noise. The term “construction” does not appear throughout the entire study, which is titled Noise Exposure and Public Health and is available here: <https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123>. As described in Section 3.11, *Noise*, while the proposed Project would result in significant and unavoidable impacts associated with construction noise levels at nearby residential receptors, operational noise associated with the Project would be less than significant with the implementation of Mitigation Measure (MM) NOI-2 and MM NOI-3a through -3b. The comment fails to identify the relationship between the proposed Project and the cited article.

Letter MN36

April 28, 2021
Mark Nelson

Comment MN36-1

The comment raises concerns about exposure to noise, particularly in children, and cites a study prepared by Maria Klatte, Kirstin Bergström, and Thomas Lachmann regarding long-term noise exposure and associated effects on cognitive performance in children. As described for the study cited in Letter MN35, this study considered long-term exposure (i.e., for a period of over one or more years) to occupational and operational sources of noise, such as aircraft noise. The term construction does not appear throughout the entire study, which is titled *Does noise affect learning? A short review on noise effects on cognitive performance in children* and is available here: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/>. As described in Section 3.11, *Noise*, operational noise associated with the proposed Project would be less than significant with the implementation of Mitigation Measure (MM) NOI-2 and MM NOI-3a through -3b. Further, while the proposed Project would result in significant and unavoidable impacts associated with construction noise levels at nearby residential receptors, construction noise levels would not exceed applicable FTA thresholds at Towers Elementary School (refer to Table 3.11-16 and Table 3.11-17). (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the BCHD campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) The comment fails to identify the relationship between the proposed Project and the cited article.

Letter MN37

April 29, 2021
Mark Nelson

Comment MN37-1

The comment states a previous public information request to Beach Cities Health District (BCHD) regarding providing a specific citation for a statement on BCHD's website inhibits intelligent public participation. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN38

April 29, 2021
Mark Nelson

Comment MN38-1

The comment states a previous public information request to BCHD regarding Blue Zone programming's relationship to community wellbeing failed to mention causality and therefore, inhibits intelligent public participation. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN39

April 30, 2021
Mark Nelson

Comment MN39-1

The comment makes an inquiry regarding the most appropriate method of sending a large comment letter. These are note comments on the adequacy or technical sufficiency of the environmental impact analysis, mitigation measures, and/or alternatives presented in the Environmental Impact Report (EIR).

Letter MN40

Comment MN40-1

The comment incorrectly states that the Environmental Impact Report (EIR) is delinquent in its written standards in general for the evaluation of impacts. Consistent with the requirements of CEQA, this EIR is an informational document that assesses the potentially significant physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. The EIR rigorously adheres to the standards for adequacy set out in CEQA Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation study, human health risk assessment, etc.). Comments regarding the environmental issues presented in the Draft EIR have been responded to in detail within these responses to comments. Text revisions to the Draft EIR have also been included in the Final EIR in response to comments.

Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to seismic safety.

Letter MN41

April 30, 2021
Mark Nelson

Comment MN41-1

The comment expresses concern regarding the safety impacts associated with the proposed substation. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electric Yard for a detailed discussion and response to comments pertaining to this issue. The comment also cites a news article about a man whose car toppled a light pole and a fire hydrant resulting in electrocutions. However, it is not the responsibility of the Environmental Impact Report (EIR) to speculate on such unique and unpredictable accidents.

Letter MN42

May 3, 2021
Mark Nelson

Comment MN42-1

The comment makes a California Public Records Act Request to Beach Cities Health District (BCHD) concerning documents associated with a list and cost of renovation activities required to accommodate future tenants of the Beach Cities Health Center as well as documents describing the impacts resulting from the reduction of BCHD health and wellness programs. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN43

May 4, 2021
Mark Nelson

Comment MN43-1

The comment makes a California Public Records Act Request to Beach Cities Health District (BCHD) regarding the passage in the California Health and Safety Code Section 32121 that authorizes BCHD to operate a Residential Care for the Elderly (RCFE) facility.

These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, for decades, BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care

Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. As provided in Health and Safety Code §32121(j), under State law, healthcare districts are empowered “[t]o establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services, including, but not limited to, outpatient programs, services, and facilities; retirement programs, services, and facilities; chemical dependency programs, services, and facilities; or other health care programs, services, and facilities and activities at any location within or without the district for the benefit of the district and the people served by the district.” It should also be noted that at least one other California Health District – the Salinas Valley Memorial Hospital District – also operates 72 assisted living beds (see the Salina Valley Memorial Hospital District website here: <https://www.svmh.com/about-us/affiliates-partnerships/>).

Additionally, all elements of the proposed Healthy Living Campus Master Plan would comply with local zoning regulations. Consistency with the City of Redondo Beach and City of Torrance General Plans is discussed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5.

Letter MN44

May 4, 2021
Mark Nelson

Comment MN44-1

The comment includes a photosimulation excerpted from Section 3.1, *Aesthetics and Visual Resources*. The comment states that because foliage that either does not currently exist or will not be removed during construction is represented in the photosimulation, the photosimulation is deliberately misleading. The comment then requests that photosimulations containing the non-existent foliage be removed from the EIR and the EIR be recirculated.

The foliage represented in the photosimulations, like the buildings also represented in these photosimulations, do not currently exist because they are intended to represent what future development would look like after construction is complete. As described in Section 3.3, *Biological Resources* and Section 3.10 *Land Use and Planning*, future development at the Project site would include landscaping plans that would replace vegetation removed during construction with new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal

Code (RBMC) Section 10-5.1900. Additionally, the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent with the Torrance Street Tree Master Plan. As such, because new trees and landscaping would be included in the final development, it is more accurate for visual aids to include landscaping than to omit foliage entirely.

Letter MN45

May 6, 2021
Mark Nelson

Comment MN45-1

The comment states that Beach Cities Health District (BCHD) increased the height of the Project since the 2019 site plan and moved the below ground parking from the 2019 site plan to an above ground parking structure. Refer to Master Response 9 – Aesthetics and Visual Resources for a summary of previous revisions to the proposed Healthy Living Campus Master Plan.

Letter MN46

May 6, 2021
Mark Nelson

Comment MN46-1

The comment incorrectly claims that the petition of resident signatures has been ignored by Beach Cities Health District (BCHD) and that BCHD misstated the Areas of Known Controversy in the EIR. Under California Environmental Quality Act (CEQA) Section 15123(b)(2) an EIR shall identify “[a]reas of controversy known to the Lead Agency, including issues raised by agencies and the public.” Section 1.8, *Areas of Known Controversy* provides a thorough discussion of the community concerns raised during extensive public scoping meetings for the proposed Project. This summary inclusion of areas of public controversy is intended to identify specific issues, including environmental physical environmental effects, that should be addressed in the EIR. It should be noted that the petition is incorporated as part of the public comments in the Final EIR (refer to Letter BW2).

Letter MN47

May 6, 2021
Mark Nelson

Comment MN47-1

The comment claims that only 0.3 percent of the Beach Cities Health Center is 75 feet tall, while the majority of the building is between 32 and 35 feet. Refer to the response to Comment MN-27 and Comment MN30-4.

Letter MN48

May 6, 2021
Mark Nelson

Comment MN48-1

The comment claims that the proposed Project would violate City of Redondo Beach Residential Design Guidelines for the Beryl Heights Neighborhood and would therefore, have an adverse impact to neighborhood character. The comment concludes the EIR must be revised and recirculated. The comment also includes an attachment of the excerpted Neighborhood Specific Guidelines for the Avenues and Beryl Heights Neighborhood from the Residential Design Guidelines. However, the neighborhood maps contained in the excerpt clearly show that the Project site is not located in either the Avenues or Beryl Heights Neighborhood. The Residential Design Guidelines, identify the Beryl Heights Neighborhood as the single-family neighborhood west of Prospect Avenue. The Project site contains two parcels zoned as P-CF and C-2 and is located east of Prospect Avenue.

Letter MN49

May 6, 2021
Mark Nelson

Comment MN49-1

The comment asserts that Beach Cities Health District (BCHD) misidentifies itself as a leading preventive health agency and its year of founding. The comment also critiques BHCD's apparent lack of financial analysis. The comment provides an excerpt from Section 1.2, *Lead Agency*, that describes BCHD services and the district's mission. The comment states the excerpt is deceptive and contains typos and grammatical errors but fails to identify specific typos, grammatical errors, or provide any clarifying detail on how or why the excerpt is deceptive. As provided at BCHD's website: "*Beach Cities Health District (BCHD) is a healthcare district focused on preventive health and serves the communities of Hermosa Beach, Manhattan Beach and Redondo Beach. Established in 1955 as a public agency, it offers an extensive range of dynamic health and wellness programs, with innovative services and facilities to promote health and prevent diseases across*

the lifespan.” These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in State CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Letter MN50

May 6, 2021
Mark Nelson

Comment MN50-1

The comment correctly identifies the City of Redondo Beach as a permitting authority for the required Conditional Use Permit (CUP), but states this fact discredits Table 3.1-1 which summarizes the heights of the tallest buildings in the Beach Cities and Torrance. The comment claims the only relevant heights that should be represented in this table are seven other P-CF (Community Facilities) zoned structures located in Redondo Beach and all other listed structures should be removed. The comment makes an unsubstantiated claim that buildings over 70 feet have been banned in Redondo Beach since 1980. Identifying buildings of comparative height in the area is relevant to the visual character of the region. The Redondo Beach Municipal Code (RBMC) does not specify building heights or floor area ratios (FARs) for development standards of P-CF zoned parcels. However, any proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). Refer also to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

Letter MN51

May 6, 2021
Mark Nelson

Comment MN51-1

The comment claims that the proposed Project would have a significant impact on aesthetics resources including impacts on skyline views, glare, and neighborhood character. The comment disagrees with the finding that the implementation of the proposed Project would not substantially degrade the surrounding visual character from Representative View 1. However, contrary to the

commenter’s assertion that this finding is not supported, the analysis of potential impacts to visual character from this location is substantiated by the photosimulation provided for Representative View 1, which shows that existing ornamental vegetation and rooflines of residences would largely obscure the proposed development and the vast majority of open sky views above the single-family residences would remain. Refer to Master Response 9 - Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to visual character. The comment also references neighborhood characteristics as defined by the Beryl Heights published design guidelines. However, as described in the response to Comments MN48-1, the Project site is not located within the Beryl Heights Neighborhood.

The comment also briefly claims, without substantial evidence or expert opinion, that the proposed Project would result in glare and noise reflection. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis and Master Response 12 – Noise Analysis for discussion on impacts of both construction and operation of the proposed Project.

Letter MN52

May 6, 2021
Mark Nelson

Comment MN52-1

The comment states the Environmental Impact Report (EIR) has not identified mitigation or management plan for second hand smoke and fails to identify it as a toxic air contaminant (TAC). As described in the response to Comment FL1-3, while second hand smoke may be locally regulated, it is not emitted in substantial quantities or for such a duration that that it would result in long-term health impacts to adjacent sensitive receptors. Nevertheless, the Beach Cities Health District (BCHD) is and would continue to be responsible for complying with Ordinance No. 0-3193-19. Noncompliance with this ordinance or any other local ordinance or regulations could be subject to enforcement action from the relevant regulatory agencies.

Letter MN53

May 6, 2021
Mark Nelson

Comment MN53-1

The comment provides an excerpt from an unknown origin regarding what is presumed to be community members agreeing that the proposed Project should focus on “Safety First.” The comment states the excerpt is inaccurate and there is no need to retrofit. This comment makes no

reference to the EIR and does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Letter MN54

May 6, 2021
Mark Nelson

Comment MN54-1

The comment suggests demolition of buildings that do not meet current seismic requirements is unnecessary and attempts to discredit the Environmental Impact Report’s (EIR’s) finding that the South Bay Hospital presents a public safety hazard. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to this issue. Again, it should be noted that Beach Cities Health District (BCHD) has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Letter MN55

May 6, 2021
Mark Nelson

Comment MN55-1

The comment claims that the project objectives are overly restrictive by requiring Beach Cities Health District (BCHD) operations to continue on a common campus, which precludes detailed analysis of the Development on an Alternative Site in Section 5.0, *Alternatives*. As described in the Environmental Impact Report (EIR), it should be noted that none of the potential alternate sites within the Beach Cities are under ownership or management of BCHD, and it would be

economically infeasible for BCHD to purchase a new site for the proposed development. As described in CEQA Guidelines Section 15126.6(f)(3), “[a]n EIR need not consider an alternative...whose implementation is remote and speculative.” Refer to Master Response 4 – Project Objectives for a detailed discussion and a response to comments pertaining to the adequacy of the project objectives.

Letter MN56

May 6, 2021
Mark Nelson

Comment MN56-1

The comment again suggests Beach Cities Health District (BCHD) purchase a new site in another location for the proposed development and claims that BCHD intends to import tenants from outside of the 90277 zip code, while 90277 residents would receive less than 5 percent of benefits from the proposed Project. Three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach specifically identify that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. It should also be noted that revenue generated by the uses under Phase 1 – including the proposed Assisted Living program – would support BCHD’s broader range of community health programs and services provided to the Beach Cities and the nearby South Bay communities. For a detailed discussion and response to comments pertaining to the benefits of the proposed Project refer to Master Response 3 – Project Need and Benefit.

Letter MN57

May 6, 2021
Mark Nelson

Comment MN57-1

The comment states the Draft Environmental Impact Report (EIR) is incomprehensible, including project alternatives “*due to material numbering and omission errors.*” It has been noted that Table ES-2 and Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in Tables ES-2 and 5.5-5. No other material number or omission errors occur with regard to the Project Alternatives in Section 5.0, *Alternatives*. It should also be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

Letter MN58

May 6, 2021
Mark Nelson

Comment MN58-1

The comment states the Environmental Impact Report (EIR) is defective and Phase 2 is insufficiently described. The comment also states the Wellness Pavilion does not have an accurate, finite, and stable description. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, regarding the approach to the programmatic analysis of the Phase 2 development program. The EIR evaluates the potential physical environmental impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a programmatic level of detail. The analysis of the proposed Phase 2 development program meets the requirements of CEQA Guidelines Section 15165.

Letter MN59

May 6, 2021
Mark Nelson

Comment MN59-1

The comment states that the Environmental Impact Report (EIR) is defective and must be remediated and recirculated due to failure to disclose significant areas of public controversy. The comment also notes that topics of controversy and supporting citations are included in the following comments. Under California Environmental Quality Act (CEQA) Section 15123(b)(2) an EIR summary shall identify “[a]reas of controversy known to the Lead Agency, including issues raised by agencies and the public.” Section 1.8, *Areas of Known Controversy* provides a thorough discussion of the community concerns raised during extensive public scoping meetings for the proposed Project. This summary inclusion of areas of public controversy is intended to identify specific issues, including environmental physical environmental effects, that should be addressed in the EIR.

Comment MN59-2

The comment reiterates claims that the EIR fails to sufficiently describe areas of known controversy. Refer to the response to Comment MN59-1.

Comment MN59-3

The comment notes that BCHD is currently not under legal obligation to retrofit the Beach Cities Health Center and asserts that BCHD must apply a moral obligation uniformly to protect surrounding neighborhoods. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to seismic safety.

Comment MN59-4

The comment states the EIR applies minimum CEQA standards, but provides no definition or further clarification of this assertion. The comment also incorrectly states the EIR ignores noise and vibration impacts to sensitive receptors at Towers Elementary School. This issue is clearly addressed in detail in Section 3.11, *Noise* under Impact NOI-1. The comment further asserts the EIR ignores chronic stress impacts related to traffic and emergency vehicles, however, as described in the response to Comment MN19-1, the comment fails to provide evidence or expert opinion that substantial chronic stress impacts would occur under the proposed Project.

Comment MN59-5

The comment claims the EIR has ignored concerns related to nighttime lighting and glare, elevation-amplifying visual impacts; impacts related to the relocation of structures; size and height of proposed structures. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, the proposed Healthy Living Campus Master Plan has gone through reiterations and redesigns in response to received community feedback. Refer to Master Response 9 – Aesthetics and Visual Resources. Further, the analysis provided in Section 3.1, *Aesthetics and Visual Resources* takes elevation differences into account when analyzing impacts. The comment includes citations to various articles describing links between nighttime lighting and cancer, depression, ecological damages, sleep deprivation and weight gain; glare with fatigue and death rays; and shade and shadow effects with but none of the referenced citations conflict with or challenge any specific findings of the EIR analysis. Many of these studies are also referenced specifically and responded to in detail in Letter TRAO and Letter FL1. For example, refer to the response to Comment TRAO-132 regarding glare.

The potential operational impacts on nighttime lighting are discussed in detail in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-3. Given that construction activities at the BCHD campus would occur between the hours of 7:30 a.m. and 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday, exterior construction lighting would generally not be required. If necessary, during the winter when the sun sets earlier or if otherwise necessary for security purposes, lighting would be shielded and directed into the interior of the Project site.

Security fencing and the noise barriers required under Mitigation Measure (MM) NOI-1 would screen light sources from view of nearby sensitive receptors (e.g., neighboring single- and multi-family residences) and other passersby. Thus, temporary lighting associated with construction activities would not adversely affect daytime or nighttime views in the area.

The proposed Project would increase lighting associated with interior building illumination and outdoor lighting for nighttime security and wayfinding around and through the BCHD campus. Interior lighting would be designed with occupancy sensors and dimmers, where feasible and appropriate. Additionally, during the evening hours, interior lighting associated with the Assisted Living and Memory Care units would be muted as a result of interior blinds, curtains, and other shades. Outdoor ground floor illumination would be limited to the entry plaza, outdoor seating areas, and pedestrian pathways. Lighting in these areas would be low lying and directed toward the ground. As such, outdoor ground lighting would generally be contained within interior spaces of the Project site. Exterior outdoor lighting would also be further muted by proposed landscaping along the perimeters of the Project site.

It should be noted that the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. During this review, the proposed lighting as well as the other reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare consistent with the requirements of the RBMC.

Comment MN56-6

The comment notes that the EIR addresses construction related air quality and noise impacts to on-site and adjacent sensitive receptors. However, the comment states numerous comments express concern regarding air quality impacts to receptors not immediately adjacent to the Project site, including surrounding schools. The comment also specifies concerns regarding air quality impacts related to operational emissions and traffic emissions. The EIR assesses the impacts associated with air pollutant emissions from construction and operation of the proposed Project within the broader Source Receptor Area (SRA) 3, which covers southwestern coastal Los Angeles County, as well as nearby sensitive receptors. Regional and localized air quality significance thresholds were designed as a screening tool to avoid air quality violations. As shown in Table 3.2-4 the EIR clearly considers adjacent recreational land uses and schools – including schools. Impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are

addressed in Impact AQ-3. With the implementation of MM AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to this issue.

The comment also includes citations to various studies, literature reviews, and article related to the association of particulate matter and general air pollution with health effects such as cardiovascular disease, Alzheimer's disease, and asthma. The references provided in this comment do not support a conclusion that construction or operational emissions would result in health impacts. For example, as also described in the response to Comment MN21-1 the study *The associated of early-life exposure to ambient PM_{2.5} and later-childhood height-for-age in India: an observational study* describes that children in the sample were exposed to an average of 55 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) of PM_{2.5} in their birth month. For reference, the construction Health Risk Assessment (HRA) demonstrates that the maximum unmitigated concentration of PM_{2.5} would be 0.41021 $\mu\text{g}/\text{m}^3$, whereas the maximum mitigated concentration would be 0.02373 $\mu\text{g}/\text{m}^3$. These emissions, which would occur temporarily during the Phase 1 construction activities, would represent the maximum PM_{2.5} emissions that could be experienced during construction or operation of the proposed Project. Similarly, the study *Severe Urban Outdoor Air Pollution and Children's Structural and Functional Brain Development, From Evidence to Precautionary Strategic Action* cite a World Health Organization (WHO) safety cut off of $<10 \mu\text{g}/\text{m}^3$. Neither construction-related nor operational emissions of PM_{2.5} would approach these values. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment or the analysis provided in Section 3.2, *Air Quality*.

Comment MN59-7

The comment states the EIR does not address concerns related to displaced wildlife and vermin infesting nearby schools and homes following project construction. As described in Comment FB1-7, issues related to rodents are discussed in the EIR, which notes that “[d]ue to the presence of the Silverado Memory Care Community and associated dining services on the BCHD campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus.” In light of this ongoing program, assertions that the proposed Project would result in vermin infestations is unfounded and speculative.

Comment MN59-8

The comment states the EIR does not address concerns relating to nuclear and radioactive medical waste. As described in Section 3.8, Hazards and Hazardous Materials, and summarized in Master Response 11 – Hazards and Hazardous Materials Analysis, the prepared Phase I Environmental Site Assessment (ESA) identified potential sources of contamination. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Neither of these ESAs identified nuclear or radioactive wastes as occurring on the Project site. All hazardous materials used operationally on-site would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. The proposed Project would be subject to all of the requirements set forth in Chapter 4 (Small Quantity Generator Requirements) of the Health and Safety Code Medical Waste Management Act. Adherence to medical waste regulations for small quantity generators would ensure that impacts related to the storage, transport, and disposal of medical waste would be less than significant.

Comment MN59-9

The comment states that the EIR has not addressed concern for harmful noise and vibration impacts affecting children at Towers Elementary School. The comment includes citation to various studies describing the relation between noise exposure and attention in the classroom and public health. It should be noted that not all of the provided links were functional, as some did not lead to a specific article but the search page of ResearchGate.net. None of the referenced citations conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise*. For example, results of the study *The Effect of Noise Exposure on Cognitive Performance and Brain Activity Patterns* found that mental workload and visual/auditory attention is significantly reduced when the participants are exposed to noise at 95 dBA level. The EIR discloses Occupational Safety and Health Administration (OSHA) and the California Division of Safety and Health identify the eight-hour 90 dBA limit for defining when impacts on human health would occur. The EIR also includes the Federal Transit Authority (FTA) has stated that an 8-hour L_{eq} of 80 dBA and a 30-day average of 75 L_{dn} is a reasonable criterion for assessment of construction activities on residential land use. The EIR includes adequate discussion of the potential impacts on sensitive receptors, including Towers Elementary School, and mitigation of construction-related noise and vibration both on- and off-site in Section 3.11, *Noise* under Impact NOI-1 and Impact NOI-2. As presented therein, the proposed construction activities during both Phase 1 and Phase 2 would have significant impacts to noise-sensitive receptors for the duration of the construction phases, because the projected L_{eq} would exceed the Residential criteria (8-hour L_{eq} of 80 dBA and 30-day average L_{dn}

of 75 dBA). To reduce the impacts of excessive construction noise on surrounding land uses, MM NOI-1 (preparation and implementation of a Construction Noise Management Plan) and MM NOI-2 (haul and delivery truck operations utilizing Lane 1 [the lane farthest from residences] along the given haul route) are identified. Haul trucks typically generate traffic noise levels of 85 dBA L_{max} at 50 feet. However, revision of the haul routes as described in Master Comment Response 10 would further reduce noise impacts from heavy haul truck trips at Towers Elementary School.

Comment MN59-10

The comment incorrectly states the EIR mistakenly addresses public service demands, as a population and housing impacts. Section 3.12, *Population and Housing*, analyzes potential impacts to population, employment opportunities, and housing stock that could result from the implementation of the proposed Project. Section 3.13.4, *Project Impacts and Mitigation Measures – Fire Protection*, includes calculated analysis that implementation of the proposed Project would generate an estimated total of 244 emergency calls per year following the completion of the proposed development under Phase 1. The comment also provides citations to various articles on the subject of chronic stress, how stress can affect health, various environmental factors associated with insufficient sleep and sleep disorders. These citations are presumably, intended to be considered in relation to sirens associated with emergency response at the Project site. However, both the comment and the citations fail to articulate a clear or direct relation to the proposed Project. For example, The acute physiological stress response to an emergency alarm and mobilization during the day and at night addressed occupational hazards for firefighters related to emergency alarm and mobilization during daytime and the nighttime hours. None of the citations provide any substantial evidence that the estimated total of 244 ambulance calls per year (i.e., approximately 20 per month) would result in negative health impacts.

Further, the noise analysis presented in the EIR includes consideration of emergency vehicle noises which would be perceived by nearby noise-sensitive land uses. The analysis includes discussion of the typical noise impacts that increased medical response would generate when sirens are utilized (approximately 100 dBA at 100 feet, and between 91 and 100 dBA at receptors along North Prospect Avenue and Beryl Street). In such a case, associated noise impacts are not considered significant given the infrequent and short duration of siren utilization (duration of exposure to peak noise levels is estimated to last for a maximum of 10 seconds, depending on traffic).

Comment MN59-11

The comment incorrectly states the EIR does not address concerns related to an increased demand for emergency, police, or fire response. The EIR includes adequate assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local police and fire protection services. As described in Section 3.13.4, *Project Impacts and Mitigation Measures – Fire Protection* under Impact PS-1, implementation of the proposed Project would incrementally increase the demand for the Redondo Beach Fire Department fire protection and Emergency Medical Services (EMS) services as well as other non-emergency services. However, this increase would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, this impact would be less than significant.

As described in Section 3.13.8, *Project Impacts and Mitigation Measures – Law Enforcement* under Impact Description PS-2, following development of the proposed Project, the increase in activity level at the Project site could generate the need for law enforcement services. However, the development under Phase 1 and Phase 2 of proposed Project would include the incorporation of security features such as access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas, and minimum dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of Redondo Beach Municipal Code (RBMC) Section 10-5.1706(c)(10). These measures would be effective in deterring criminal activity at the Project site so any increase in crime would not be substantial.

Comment MN59-12

The comment incorrectly claims the EIR omitted recreational analysis and asserts shade and shadow effects of the proposed Project would decrease recreation at Towers Elementary School. The EIR does include consideration of impacts to recreation and recreational amenities in Section 4.0, Other CEQA Considerations. Pursuant to Appendix G of the CEQA Guidelines, impacts of a proposed project on recreational resources are characterized as:

- a) A resulting increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and

- b) The development of recreational facilities or the construction or expansion of recreational facilities which would result in adverse physical effects on the environment.

As described in Section 4.5, *Effects Found Not to Be Significant*, the proposed Project does not involve the development of recreational facilities and would not substantially increase demand on existing recreational facilities. As a result, the Project would not cause a significant impact on recreation or recreational amenities and additional analysis of the topic is not required. Potential impacts of shade and shadow effects are discussed in Section 3.1, *Aesthetics and Visual Resources* and supported by a shade and shadow model prepared by a licensed architect.

Comment MN59-13

The comment incorrectly claims that concerns relating to school drop-off/pickup traffic and general construction and operational traffic under the proposed Project have been unaddressed. Due to requests from the City of Torrance and Torrance Unified School District (TUSD), construction haul routes proposed in the EIR have been revised to avoid construction traffic conflicts with pedestrian safety in proximity to schools. Refer to Master Response 13 – Transportation Analysis for further detail. TUSD also requested during the public comment period that MM NOI-1 be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School, in order to minimize potential delays of drop-off/pick-up activities and vehicle-pedestrian conflicts. This request will require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1st grade and 5th grade), and are not the same at the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

Construction and operational traffic under the proposed Project is described in Section 3.12, *Transportation* and summarized in Master Response 13 – Transportation Analysis. Implementation of the Construction Traffic and Access Management Plan under MM T-2 would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Construction

management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible.

Further, implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). After completion of Phase 2, the proposed Project would generate a net increase of 376 new daily trips as compared with existing conditions. While operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation below existing levels generated at the BCHD campus (when the majority of cut-through traffic occurs), the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods, with no measurable increase in cut-through traffic forecasted by the study. Therefore, the proposed Project would not contribute to peak period traffic.

Letter MN60

May 6, 2021
Mark Nelson

Comment MN60-1

The comment states a previous California Public Records Act request regarding reimbursement agreements related to vaccine services provided by BCHD was not fulfilled and therefore, public participation is being blocked. The comment then asserts need for future funding must be assumed to be reduced and BCHD services should be limited to the three Beach Cities. The comment further asserts BCHD is using funds outside the district and has not demonstrated a need for current or future funding. These comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. As provided in CEQA Guidelines Section 15204, “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*” Refer to Master Response 15 – Purpose

of Public Review for further detail and discussion on effective public comment. Further, while CEQA states that an EIR should provide a description of the project, including a “*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to do so if the information “*...does not supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about environmental information, is reaffirmed by the courts (Sierra Club v. County of Napa (2004) 121 Cal.App.4th 1490, 1503).

Letter MN61

May 6, 2021
Mark Nelson

Comment MN61-1

The comment states a previous California Public Records Act request regarding reimbursement agreements related to vaccine services provided by the Beach Cities Health District (BCHD) was not fulfilled and therefore, public participation is being blocked. Refer to the response to Comment MN60-1.

Letter MN62

May 8, 2021
Mark Nelson

Comment MN62-1

The comment states the Beach Cities Health District (BCHD) board and public review board previously approved a design for a proposed Project that is not represented in the Environmental Impact Report (EIR) and therefore, the EIR is inaccurate. As stated in the opening sentence of Section 1.0, *Introduction*, “*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 assessment is limited to describing environmental effects of the proposed Project and is not obligated to assess the environmental impact analysis, mitigation measures, or alternatives of any previous designs.

Letter MN63

May 8, 2021

Mark Nelson

Comment MN63-1

The comment states a photosimulation provided in the EIR is misleading because it includes nonexistent foliage. The comment also requests diagrams without the foliage be provided. Refer to the response to Comment MN44-1.

Letter MN64

May 10, 2021

Mark Nelson

Comment MN64-1

The comment provides slides comparing previous design iterations of the proposed Project, particularly noting height increase and parking changes. The comment expresses general concerns related to aesthetic and visual resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining building height and visual character.

Letter MN65

May 11, 2021

Mark Nelson

Comment MN65-1

The comment states the proposed Residential Care for the Elderly (RCFE) Building is incompatible land use requirements but fails to specify any such requirements. The comment also states the proposed Project is not compatible with and the surrounding character, density, and intensity of adjacent residential land uses. The comment notes the Kensington Assisted Living Facility as a commercial property. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character. Refer also to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

Letter MN66

May 12, 2021

Mark Nelson

Comment MN66-1

The comment provides the same slides described in Comment MN64-1 which compare previous designs of the proposed Project to the current design. The comment states the project description is inaccurate and unstable but fails to provide specifications or further details regarding how or why the EIR analysis is insufficient in this regard or identify specific concerns. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, conceptual plans for the proposed Healthy Living Campus Master Plans have gone through revisions in response to community feedback. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Letter MN67

May 12, 2021
Mark Nelson

Comment MN67-1

The comment expresses general concerns that the location of the proposed substation would create health and traffic hazards and states the Draft EIR is deficient in its discussion of the substation. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electric Yard.

Letter MN68

May 12, 2021
Mark Nelson

Comment MN68-1

The comment requests broad and unspecified information regarding Wood Environment & Infrastructure Solutions, Inc. These comments do not address to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives and does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Refer to Master Response 15 – Purpose of Public Review.

Letter MN69

May 14, 2021
Mark Nelson

Comment MN69-1

The comments describes a 1,200 signature petition in opposition of the proposed Project and expresses dissatisfaction with redesigns to the proposed Project. This comment along with the referenced petition (refer to Letter BW2) has been noted incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment MN69-2

The comment expresses general concerns regarding aesthetic and visual impacts due to the height of the proposed Residential Care for the Elderly (RCFE) Building, including blocked views of the Palos Verdes hills and skyline, shade and shadow effects, privacy, and incompatibility with the surrounding neighborhood. The comment compares the height of the proposed Project with previous plan designs and notes Beryl Height Design Guidelines. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments regarding the aesthetic and visual impacts of the Project, including compatibility of the Project design and height with the visual character of the surrounding neighborhood, views of the Palos Verdes Hills, skyline views, shade and shadow effects, privacy concerns, and further discussion on design revisions. As described in Comment MN48-1, the Project site is not located in the Beryl Heights neighborhood nor subject to City of Redondo Beach Residential Design Guidelines.

Comment MN69-3

The comment compares the proposed Project's size with other development in the region including the South Bay Galleria and the Staples Center. The states the proposed Project would occupy a greater above-ground square footage than previous designs and would not be compatible with the surrounding neighborhood. The comment asserts that implementation of the proposed Project would cause traffic back-ups along North Prospect Avenue but offers no evidence of this claim. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of revisions to the proposed Healthy Living Campus Master Plan. As described in Section 1.0, *Introduction*, community response to the 2019 Master Plan expressed concern regarding the 2019 project's proposed density. In response, the 2020 and current proposed Project reduced total

occupied building area to 484,900 square feet. This reduction in total building area was achieved through site redesign and reducing the size of the proposed RCFE Building by more than 219,000 square feet. Overall, the proposed Project would reduce total occupied building area would be than that proposed under the 2019 Master Plan. Implementation of the Construction Traffic and Access Management Plan under Mitigation Measure (MM) T-2 would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbook*. Construction management planning and monitoring would ensure that impacts to local streets, vehicle and pedestrian and bicycle traffic would be minimized as much as possible. Further, while not required under the California Environmental Quality Act (CEQA) and therefore not discussed in the Environmental Impact Report (EIR), the Non-CEQA Intersection Operational Evaluation included in Appendix J generally found that due to a minor reduction in peak hour trips, the proposed Project would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity. Refer to Master Response 13 – Transportation Analysis for additional discussion regarding the EIR’s analysis of transportation impacts and mitigation measures proposed to reduce such impacts.

Comment MN69-4

The comment expresses concern that heavy haul trucks routes near schools and associated emissions would adversely impact students. The comment also claims traffic impacts would occur on Beryl Street. It should also be noted that BCHD has revised the proposed haul routes which Torrance Unified School District (TUSD) has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes. The comment also fails to note that the EIR acknowledges that construction-related activities could disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could temporarily interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, implementation of MM T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect

Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. With the implementation of MM T-2, construction-related hazards would be reduced to less than significant with mitigation. For additional discussion and a detailed response to comments pertaining to construction-related impacts, refer to Master Response 13 – Transportation Analysis.

Further, as described in Section 3.2, *Air Quality* and Section 3.8, *Hazards and Hazardous Materials*, the supporting technical studies and exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would not be significantly impacted by construction-related air emissions or release of hazardous material.

Comment MN69-5

The comment expresses concern that heavy-haul trucks near schools would cause disruption to nearby residences and Towers Elementary School. The comment also incorrectly asserts students at Towers Elementary would experience intermittent noise levels of 85 dBA. As provided in Table 3.11-16 and Table 3.11-17 construction-related noise-levels experienced at Towers Elementary School would not exceed Federal Transit Authority (FTA) thresholds. It should also be noted that BCHD has revised the proposed haul routes which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for additional a detailed discussion pertaining to the revised construction haul routes. The comment also fails to acknowledge that noise impacts are addressed in detail within Section 3.11, *Noise* and the exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would not be significantly impacted by construction-related vibration.

Comment MN69-6

The comment claims the proposed assisted living units and memory care would be beneficial to residents outside of the Beach Cities while impacts would be experienced locally. The comment asserts the proposed facility does not need to be located within the Beach Cities. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the community benefits associated with the proposed Project. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care

community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

Comment MN69-7

The comment notes BCHD provides services to Beach Cities. The comment asserts following implementation of the proposed Project residents of Torrance would experience impacts related to: construction noise, traffic, emissions, particulate matter, shade and shadow effects, glare, night lighting, sirens and "other damages." The comment fails to acknowledge that each of these issues is addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. The comment also fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities.

Comment MN69-8

The comment claims noise from construction activities would disrupt the surrounding neighborhood including schools, homes, and businesses. Noise impacts are addressed in detail in Section 3.11, *Noise* and supported by detailed quantitative noise modeling. Temporary, but prolonged construction-related noise impacts on on-site and adjacent sensitive receptors are disclosed and discussed in detail under Impact NOI-1. However, as described in Impact NOI-1, Towers Elementary School would not experience significant construction-related noise nor impacts (refer to Table 3.11-16 and Table 3.11-17). As described under Impact NOI-3, the operations at the BCHD campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC). Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure

substantially contribute to increases in noise pollution that could measurably result in health concerns.

Comment MN69-9

The comment notes that the EIR describes outdoor events would be permitted until 10:00 p.m. and suggests noise from such events would disrupt nearby residences. As described in Section 3.11, *Noise* under Impact NOI-3, events held at the Project site would meet the acceptable exterior noise criteria of 50 to 55 dBA consistent with RBMC Section 4-24.301 and TMC Section 6-46.7.2. Further, implementation of MM NOI-3b, would require preparation of an Event Management Plan which would establish procedures to limit noise generated by events held on the proposed Healthy Living Campus. Additionally, MM NOI-3c would require the proposed Aquatics Center to close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria, which would further reduce operational noise impacts. As such, noise impacts associated with events held at the Project site would be less than significant.

Comment MN69-10

The comment states the proposed assisted living facility is deliberately unaffordable to local residents. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to this issue. The comment also asserts, without substantial evidence or expert opinion, that surrounding neighborhoods have historically experienced noise, traffic, emission and construction-impacts from operation of the existing BCHD campus. The comment goes on to assert that BCHD must be funded through tax-free public bonds and operate as non-profit. These comments are not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives and does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Refer to Master Response 15 – Purpose of Public Review. The comment also claim, again without substantial evidence, that nearby residences would suffer environmental injustice under implementation of the proposed Project. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. Refer to Master Response 16 – Environmental Justice.

Comment MN69-11

The comment claims implementation of the proposed Project would create noise, traffic, emissions, excessive nighttime security lighting, sirens, and other negative impacts and therefore would not qualify for a Conditional Use Permit (CUP). The comment fails to acknowledge that each of these issues is addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. Refer to Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF (Community Facility) zoning and land use designation. The comment further states the proposed Project would be incompatible with the surrounding neighborhood due to the size of the proposed Project. Refer to BCHD Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Comment MN69-12

The comment notes the proposed Project does not involve a public vote and then goes on to describe powers of taxpayers. These comments does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Letter MN70

May 15, 2021
Mark Nelson

Comment MN70-1

The comment states that the relocation of the proposed Residential Care for the Elderly (RCFE) Building to the northern perimeter, as compared to previous project designs, of the Project site maximizes visual impacts. This comment fails to recognize that the bulk and mass of the RCFE Building is focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and forms a step-down in building height to the single- and multi-family residential development along Beryl Street. The comment further asserts, without substantial evidence, that the former South Bay Hospital and current Beach Cities Health Center campus have created environmental and economic justice impacts. Refer to Master Response 16 – Environmental Justice.

Comment MN70-2

The comment clarifies that the comments contained within the letter address the project design released June 12, 2020 and approved by the BCHD Board on June 17, 2020. The commenter goes on to express their opinion disapproving of the changes contained within the published Healthy Living Campus Master Plan. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. Further, it should be clarified BCHD has not approved the proposed Project. The EIR appropriately considers a reasonable range of alternatives to the proposed Project consistent with CEQA Guidelines Section 15126.6. While BCHD has authorized funding for the preparation of market studies, architectural design drawings, technical studies, etc. these were all necessary to begin conceptual development of a proposed Project for analysis in the subject EIR. The specific budget for the development of the Healthy Living Campus Master Plan is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment MN70-3

The comment states, without substantial evidence, that the proposed demolition of the Beach Cities Health Center would create environmental damage. The comment goes on to summarize that BCHD is not currently legally required to provide seismic retrofits. The comment also claims that BCHD provides no professional opinion that the continued use of the Beach Cities Health Center without retrofit would create safety risks. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to concerns regarding seismic safety of the BCHD structures and need for seismic retrofit of facilities.

Comment MN70-4

The comment states the proposed Project has not conducted any environmental and economic justice analyses. The Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN70-5

The comment states asserts, without substantiating calculations, that a 75-foot tall perimeter construction is the equivalent of 300-foot tall construction at the campus center. Analysis of impacts to aesthetic and visual resources is based on multiple visual reconnaissance surveys of the Project site and the surrounding vicinity, which included extensive photography and the development of detailed computer-generated photosimulations by a licensed architect. The

analysis addresses the relationship of the Project site to the surrounding community, and the existing local policy framework for protecting visual resources. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height.

Comment MN70-6

The comment claims that is that Beach Cities Health District (BCHD) is weaponizing economic and environmental injustice by proposing the development of the RCFE Buildings along the northern border of the Project site near young, economically disadvantaged renters with a larger minority fraction than the other Beach Cities that own and fund BCHD. Contrary to the commenter’s assertion, the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN70-7

The comment states the proposed Project parking structure would create environmental damages associated with light, air quality, and noise. The EIR includes adequate analysis under CEQA impacts that physical changes of the proposed Project may have on the surrounding community. These issue are each addressed in great detail in Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, and Section 3.11, *Noise*, with analysis supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis, Master Response 10 – Air Quality Analysis, Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment MN70-8

The comment states that the current version of the proposed Healthy Living Campus Master Plan removed 160,000 square feet (sf) of underground parking and relocated it to an 800-car parking structure. Refer to Master Comment Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

Comment MN70-9

The comment asserts PM_{2.5} pollution form construction and traffic creates a physical alteration in the brainstems of children and causes Alzheimer’s Disease and delayed development. The comment provides reference to two studies, neither of which support a conclusion that construction or operational emissions of the proposed Project would result in health impacts. For example, the

study *Cerebrospinal Fluid Biomarkers in Highly Exposed PM_{2.5} Urbanites: The Risk of Alzheimer's and Parkinson's Diseases in Young Mexico City Residents* describes findings that exposure to particulate matter (PM_{2.5}) and ozone (O₃) above U.S. Environmental Protection Agency (USEPA) standards is associated with Alzheimer's disease risk. The study goes on to describe cerebrospinal fluid biomarkers from a sample population of Mexico City Metropolitan Area children. Similarly, the study *The emerging risk of exposure to air pollution on cognitive decline and Alzheimer's disease – Evidence from epidemiological and animal studies* describes emerging evidence which suggests exposure to polluted air is associated with impaired cognitive functions at all ages and increased risk of Alzheimer's Disease and other dementias in later life; particularly notable with traffic-related pollutants, noting association with individuals who living in proximity of major roadways. However, neither of these references conflict with or challenge the findings of the quantitative air quality assessment. The comment fails to acknowledge the extensive quantitative modeling provided under Impact AQ-3, which demonstrates that construction and operational criteria air pollutant emissions, would not exceed the South Coast Air Quality Management District's (SCAQMD's) localized significance thresholds (LST), which account for potential human health effects from criteria air pollutants.

Comment MN70-10

The comment claims the majority of residents of the proposed assisted living units and memory care units would come from outside 90277 and outside the Beach Cities while all economic and environmental justice impacts will be experienced by 90277 residents. As described in Market Response 5- Affordability of RCFE Assisted Living and Memory Care Units, the market study prepared for the proposed Project identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. It should also be noted, again, that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN70-11

The comment compares voter approval for the former South Bay Hospital to the lack of voter approval and hospital services of the existing Beach Cities Health Center. The comment states BCHD is not required to be located at its current site. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. However, as described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities were considered. However, the Development on Alternate Site alternative was rejected due to very few sites existing within the Beach Cities that are large enough to accommodate the proposed uses, are not currently occupied by other essential facilities, are currently zoned for uses consistent with those proposed Project, or are not constrained in other ways that would result in a similar or less degree of environmental impact.

Comment MN70-12

The comment notes a 1,200 signature petition in opposition to the proposed Project. This comment along with the referenced petition (refer to Letter BW2) has been noted incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment MN70-13

The comment suggests the organization of BCHD is inept and expresses doubt of the district's ability to provide care to PACE participants and residents of the assisted living and memory care units in relation to COVID-19. The comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Refer to Master Response 15 – Purpose of Public Review.

Comment MN70-14

The comment provides a link to a Wood's website describing its involvement in oil and gas consulting, engineering, procurement and construction management, etc. Neither the comment nor these articles provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. Again, the comment does not relate to the suggested focus of the review in CEQA Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible

impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” Refer to Master Response 15 – Purpose of Public Review.

Letter MN71

May 15, 2021
Mark Nelson

Comment MN71-1

The comment states the Environmental Impact Report (EIR) is defective due to its failure to assess intermittent impacts of the proposed heavy haul routes on health, cognition, and learning capability of elementary students. The comment references and summarizes *Does noise affect learning? A short review on noise effects on cognitive performance in children*, an article providing an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies identified therein find acute exposure to noise create negative effects on speech perception and listening comprehension while chronic exposure to aircraft noise negatively affects reading comprehension.

Firstly, it should be noted that the construction haul routes have been revised to avoid hauling in proximity to Towers Elementary School and Magruder Middle School in response to requests from the City of Torrance and the Torrance Unified School District (TUSD) in their public comments. Further, nothing in the cited material references traffic-related noise from construction vehicle trips or suggests the findings are directly applicable to the proposed Project. The quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant.

Letter MN72

May 15, 2021
Mark Nelson

Comment MN72-1

The comment describes an intention to file a list of unanswered California Public Record Requests. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 15 – Purpose of Public Review.

Letter MN73

May 16, 2021
Mark Nelson

Comment MN73-1

The comment states operation of the proposed parking structure would generate increases in intermittent noise and therefore, using average noise levels as a metric for impact analysis is flawed. The comment also states, without substantial evidence or expert opinion, that intermittent noise associated with the proposed parking structure would disturb homeschooling, concentration, sleep, and quiet enjoyment of residential uses.

The comment asserts that Beach Cities Health District (BCHD) has a moral obligation to protect community health and therefore must recognize intermittent noise as a driver of stress, cardiovascular risk, classroom impairment, and general negative health impacts. The comment incorrectly asserts, without substantial evidence or expert opinion, that intermittent noise would impact children at Towers Elementary School and proceeds to claim intermittent noise would have greater impact on students with physical and learning abilities, and second-language learners that tend to be economically and socially disadvantaged. Again, the comment characterizes this as environmental justice issue. Refer to Master Response 12 – Noise Analysis as well as Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to these issues.

The comment provides citations to various studies and literature reviews related to noise, oxidative stress, and negative health impacts, including the aforementioned *Does noise affect learning? A short review on noise effects on cognitive performance in children*, previously discussed in the response to Comment MN71-1. However, beyond discussing the issue of noise, the referenced studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk* discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. *Noise and Quality of Life* describes the role of oxidative stress in noise induced hearing loss which can further cause deterioration in quality of life in that it disrupts sleep, causes cognitive impairment, and has many non-auditory deleterious health effects.

It should be noted that sporadic noises from parking operations are thoroughly addressed in Section 3.11, *Noise*. As described in Section 3.11, *Noise*, the exhaustive quantitative modeling efforts associated with the EIR clearly demonstrate that Towers Elementary School would neither be significantly impacted by construction-related nor operational noise and vibration. Refer to Master

Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to the operational noise analysis.

Letter MN74

May 16, 2021
Mark Nelson

Comment MN74-1

The comment reiterates general concerns, without substantial evidence, that construction traffic along haul routes would create health hazards and intermittent noise with negative cardiovascular, cognitive, and other community health effects. The comment also asserts truck trips would create vibration impacts. The comment states that average noise is a flawed metric to assess construction-related noise impacts and again attempts claim noise impacts related to construction-trips would create an environmental justice impact. The comment provides citations to the same four studies addressed in the responses to Comment MN73-1.

Firstly, it should be noted that the construction haul routes have been revised to avoid hauling in proximity to Towers Elementary School and Magruder Middle School in response to requests from the City of Torrance and the Torrance Unified School District (TUSD). Refer to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Regarding vibration impacts related to truck trips, the EIR states “[h]aul truck operations associated with Phase 1 and Phase 2 would not resulting in the doubling of events, would be temporary in nature, and would not exceed the existing vibration by 3 dB or more. Therefore, vibration levels from construction equipment and haul trips associated with BCHD development would not exceed criteria established by the FTA and impacts would be less than significant.”

Regarding noise metrics, it is important to note that the threshold of significance for noise impacts identified in the EIR is based on FTA Transit Noise and Vibration Impact Assessment Manual, which states that an L_{eq} of 80 dBA and a 30-day average of 75 dBA L_{dn} is a reasonable criterion for assessment of construction activities on residential land use. As described in the EIR, this unit of measurement is appropriate because L_{eq} can be used to describe:

- Noise level from operation of each piece of equipment separately, and noise levels can be combined to represent the noise level from all equipment operating during a given period;
- Noise level during an entire phase; and,

- Average noise over all phases of the construction.

Given the duration of construction activities associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program, the noise metric L_{dn} , averaged over 30-days, was also assessed.

It should also be noted, again, that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Letter MN75

May 16, 2021
Mark Nelson

Comment MN75-1

The comment references the State of California Department of Justice’s Environmental Justice at the Local and Regional Level Legal Background fact sheet and asserts that the Beach Cities Health District (BCHD) fails to apply these metrics. The EIR clearly addresses potential physical environmental impacts to aesthetics and visual resources, air quality, hydrology and water quality, noise, and the other referenced metrics. However, it should also be noted, again, that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN75-2

The comment asserts noise and emissions associated with traffic along heavy haul routes would cause adverse health and learning effects to students within the City of Torrance, with particular effects on English as a Second Language students. However, the comment provides no substantial evidence or expert opinion. First, it should be noted the construction haul routes have been revised to avoid hauling in proximity to Towers Elementary School and Magruder Middle School in response to requests from the City of Torrance and the Torrance Unified School District (TUSD) in their public comments. Refer to Master Comment Response 13 – Transportation Analysis. Further, the exhaustive quantitative noise modeling provided in the EIR demonstrates that the addition of haul truck trips generating traffic noise levels of 85 dBA L_{max} at 50 feet, would increase existing daytime traffic noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21) and would not create a significant noise impact. The comment fails to acknowledge impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. The proposed Project would be

consistent with the SCAQMD's 2016 Air Quality Management Plan (AQMP) as discussed under Impact AQ-1. Issues related to impacts to human health are still addressed in detail under Impact AQ-4 and supported by a construction HRA that evaluated individual lifetime cancer risks and non-cancerous chronic hazard index (HIc) associated with DPM emissions during construction activities associated with the Phase 1 preliminary site development plan and the Phase 2 development program and determined impacts would be less than significant with mitigation.

Comment MN75-3

The comment makes an unsubstantiated claim the former South Bay Hospital and existing BCHD campus have subjected surrounding neighborhoods to over 60 years of environmental justice impacts. Again, the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Letter MN76

May 17, 2021
Mark Nelson

Comment MN76-1

The comment claims that the Beach Cities Health District (BCHD) intentionally proceeded with the proposed Project during the COVID-19 pandemic to avoid timely response to California Public Records Request Act requests. The comment further asserts BCHD must fulfill all outstanding California Public Record Act requests and incorporate them into the Environmental Impact Report (EIR) or delay the closing of the public comment period. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. In light of the COVID-19 pandemic, BCHD, as the lead agency, extended the requisite 45-day public review and comment period to 90 days, from March 10, 2021 through June 10, 2021. As such, adequate public comment period has been provided. In accordance with CEQA Guidelines Section 15088, BCHD, as the lead agency, has reviewed all of the comments received on the Draft EIR for the proposed Project, and provided written responses. As an inclusion of the Final EIR, all of these comments are released with the Final EIR.

Letter MN77

May 17, 2021
Mark Nelson

Comment MN77-1

The comment claims the EIR disregards short and long-term negative health impacts of the proposed Project and therefore ignores a moral obligation and must be recirculated. The comment provides citations to various studies and literature reviews related to chronic stress, chronic stress in children, and negative health impacts, including cancer development, cardiovascular damage, inflammation, pulmonary disease. However, the comment fails to identify any clear or direct relevance between the referenced studies and the proposed Project or the environmental impact analysis provided in the EIR. None of the cited materials provide any mention of construction activities, noise, or traffic or their potential relationship with stress. For example, the article *Psychological Stress and Cardio Vascular Disease* describes chronic stressors in terms of: job stress, marital unhappiness, the burden of caregiving, and acute stressors in terms of earthquake disasters.

Letter MN78

May 17, 2021
Mark Nelson

Comment MN78-1

The comment states the Environmental Impact Report (EIR) is flawed for not considering construction and traffic noise impacts relation to atrial fibrillation and provides a citation for a study that study investigated an association between noise annoyance and atrial fibrillation. Annoyance from road traffic, aircraft, railways, industrial/construction and neighborhood noise during daytime and sleep were collected in the study. The study found significant associations between annoyance and atrial fibrillation for aircraft noise annoyance, road traffic annoyances during sleep, and neighborhood annoyances during daytime and sleep, and railway noise annoyance during sleep. However, the study did not identify significant associations between annoyance and atrial fibrillation for temporary construction noise.

Letter MN79

May 17, 2021
Mark Nelson

Comment MN79-1

The comment provides a citation to a study on the damaging effects of excessive or prolonged stress on childhood development. The comment asserts that the proposed Project would create noise, vibration, traffic, and construction activities leading to the potential for toxic stress, and

therefore must mitigate such effects. However, neither the comment nor the cited study provides a clear relationship between the proposed Project or the environmental impact analysis provided in the EIR. The cited study makes no mention of noise, vibration, traffic, or construction activities as stressors. The EIR includes adequate analysis under California Environmental Quality (CEQA) impacts that physical changes of the Project may have on a community, including Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise*, and Section 3.14, *Transportation*.

Letter MN80

May 17, 2021
Mark Nelson

Comment MN80-1

The comment states that the Beach Cities Health District (BCHD) has failed to fulfill previous California Public Records Act requests relating to “costs by Resident vs. Non-Residents” and asserts BCHD must partition benefits by residents versus non-residents as well as benefits to Redondo Beach residents versus benefits to residents of Hermosa Beach and Manhattan Beach. Refer to the response to Comment MN18-1. The comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures. As provided in California Environmental Quality Act (CEQA) Guidelines Section 15204, “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*”

Letter MN81

May 17, 2021
Mark Nelson

Comment MN81-1

The comment states that the proposed Residential Care for the Elderly (RCFE) Building would be visible from a significant viewshed and provides two attached Google Earth Pro images intended to represent areas where the proposed Project would be visible. Under the California Environmental Quality Act (CEQA), an impact to aesthetic and visual resources in an urban area is not considered significant simply because it is visible from a public location. Rather, an impact

is considered significant if it would substantially degrade the existing visual character or quality of public views of the site and its surroundings. The EIR found, based on detailed technical study including the generation of precise photosimulations, that while the proposed Project would alter the visual character of the Project site and surrounding areas, the proposed development would comply with the Redondo Beach and Torrance General Plans and municipal codes and would not degrade the surrounding visual character. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for further discussion on impacts associated with aesthetics and visual resources from the proposed Project.

Letter MN82

May 20, 2021
Mark Nelson

Comment MN82-1

The comments summarizes placement and design revisions between the 2019 Master Plan and the current proposed Project and incorrectly states the proposed Project increased square feet from the 2019 design. The comment asserts the proposed Project would significantly increase aesthetic and visual, noise, traffic, and emission impacts to younger, renting, higher density area of people of color between Prospect and Flagler and Beryl and 190th and attempts to classify this an environmental justice impact. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan. However, it should be noted that the Project site is not located within an environmental justice community. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Letter MN83

May 20, 2021
Mark Nelson

Comment MN83-1

The comment states, without substantial evidence or expert opinion, that the California Public Records Act response received for a previous comment regarding the foliage represented in the photosimulations was insufficient. The comment states a photosimulations provided in the Environmental Impact Report (EIR) are misleading because it includes nonexistent foliage. This previously submitted comment regarding foliage is addressed in Comment MN44-1.

Letter MN84

May 23, 2021
Mark Nelson

Comment MN84-1

The comment claims, without substantial evidence or expert opinion, the proposed Project would cause stress, anxiety, depression, sleep loss and other mental and physical damages to surrounding neighborhoods. The comment provides a citation to an article describing the linkage between mental and cardiovascular health. However, neither the comment nor the citation directly or clearly relates these findings to the proposed Project or supports the claim that implementation of the proposed Project would cause stress, anxiety, depression, sleep loss and other mental and physical damages to surrounding neighborhoods.

Letter MN85

May 24, 2021
Mark Nelson

Comment MN85-1

The comment critiques revisions from previous designs to the current proposed Project and states, without substantial evidence, that the size and height of the proposed Project would create significant impacts. Refer to Master Response 9 – Aesthetics and Visual Resources for a detailed discussion and response to commenters pertaining to building height and visual character. The comment further asserts the Draft Environmental Impact Report (EIR) is defective because the proposed Project fails to provide perimeter parking and the Bakaly Moral Obligation Standard. However, this comment is not germane to the analysis of physical environmental impacts pursuant to the requirements of the California Environmental Quality Act (CEQA).

Letter MN86

May 24, 2021
Mark Nelson

Comment MN86-1

This comment again restates the claim that the Beach Cities Health District (BCHD) selectively applies a moral obligation. Refer to the response to Comment MN85-1, this comment is not

germane to the analysis of physical environmental impacts pursuant to the requirements of the California Environmental Quality Act (CEQA).

Comment MN86-2

This comment is identical to Comment MN29-1. Refer to the response to Comment MN29-1.

Comment MN86-3

This comment is a letter to the Towers and Torrance Parent Teachers Associations and the Torrance Unified School District (TUSD) Board and Superintendent notifying them of the proposed Project.

Letter MN87

May 25, 2021

Mark Nelson

Comment MN87-1

The comment expresses support for comments received from Torrance Redondo Against Overdevelopment (TRAO), particularly those relating to the size and design of the proposed Project and incorrectly suggests that the 1,200 signature petition was ignored.

Comment MN87-2

The comment states, without substantial evidence or expert opinion, that the proposed Project is incompatible with surrounding neighborhoods due to its size and elevation difference. The comment expresses concern that the proposed Residential Care for the Elderly (RCFE) Building and parking structure would create blocked views, shade and shadowing effects, and privacy issues. Refer to Master Response 9 – Aesthetics and Visual Resource Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment MN87-3

The comment notes construction noise would create temporary but prolonged increase identifies temporary, but prolonged, construction-related noise impacts to on- and off-site sensitive receptors. The comment correctly notes that temporary, but prolonged construction-related noise would exceed the identified Federal Transit Authority (FTA) thresholds for the following sensitive receptors:

- West Torrance residents adjacent to Flagler Alley;

- West Torrance residents adjacent to Flagler Lane;
- Redondo Beach residents along Beryl Street to the North; and
- Redondo Beach residents along North Prospect to the North.

Refer to Master Response 12 – Noise Analysis for detailed discussion and a response to comments pertaining to the quantitative noise modeling, assumptions, and results.

Comment MN87-4

The comment expresses concern that construction-related traffic under the proposed Project would overwhelm nearby neighborhoods streets, with particular focus on heavy haul truck routes bypassing Towers Elementary School. It should also be noted that Beach Cities Health District (BCHD) has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to the transportation analysis.

Comment MN87-5

The comment incorrectly states that construction of the proposed Project would expose nearby receptors, including neighboring residents and schools students, to hazardous materials. The comment summarizes that volatile organic compounds (VOCs) including tetrachloroethylene (PCE) were detected at the Project site. As described in Section 3.8, *Hazards and Hazardous Materials* and summarized in Master Response 11 – Hazards and Hazardous Materials Analysis, neither construction or operational activities associated with the proposed Project would result in the release hazardous materials. For detailed discussion and response to concerns regarding Project impacts on schools and sensitive receptors from construction-related hazards see Master Response 11 – Hazards and Hazardous Materials Analysis. The comment also expresses concerns regarding noise and vibration impacts. Refer to Master Response 12 – Noise Analysis for detailed discussion and response to concerns regarding Project impacts on sensitive receptors from noise.

Comment MN87-6

The comment states the proposed Project would be incompatible with P-CF (Community Facilities) zoning and notes six other structures located on a P-CF zoned parcel are not as tall as than the proposed Project. The comment also incorrectly states that under the proposed Project, BCHD would gift public land to private developers. The RBMC does not specify building heights or floor area ratios (FARs) for development standards of P-CF zoned parcels. However, any

proposed facilities on P-CF zoned parcels would be subject to review and approval by the Redondo Beach Planning Commission (RBMC Section 10-2.1116). The campus is owned by BCHD, a public agency, and designated P (Public or Institutional) land use within the Redondo Beach General Plan. Ownership and land use designation of the Project site would not change under Project implementation. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

Comment MN87-7

The comment criticizes BCHD’s use of taxpayer funds and financial operations as a public entity and notes residents of the proposed Assisted Living units would not be exclusive to Redondo Beach. The comment further claims that the Redondo Beach Fire Department (RBFD) and paramedics would be excessively taxed by the proposed assisted living units and Program of All-Inclusive Care for the Elderly (PACE) program. The comment also states the former South Bay Hospital was voter approved and exclusively served the Beach Cities.

First, it should be noted that it is highly unlikely that the original South Bay Hospital only served the three Beach Cities. Hospitals (and health districts) generally do not provide benefits to a single zip code or neighborhood and instead provide these benefits to a wider community. Three market studies evaluating the feasibility of a proposed Assisted Living program and Memory Care community in the City of Redondo Beach specifically identify that a large majority (i.e., 70 percent) of the of the proposed Assisted Living program and Memory Care community residents would come from the area within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. It should also be noted that revenue generated by the uses under Phase 1 – including the proposed Assisted Living program – would support BCHD’s broader range of community health programs and services provided to the Beach Cities and the nearby South Bay communities. Refer to Master Response 6 – Financial Feasibility/Assurance. For decades, BCHD has utilized public/private partnerships to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation.

The EIR includes adequate assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service rations, response times, or other performance objectives of local fire protection services. As described in Section 3.13, *Public*

Services under Impact PS-1, implementation of the proposed Project would incrementally increase the demand for the Redondo Beach Fire Department fire protection and Emergency Medical Services (EMS) as well as other non-emergency services. However, this increase would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection and EMS services and facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, this impact would be less than significant.

Comment MN87-8

The comment expresses concerns regarding BCHD acting as the lead agency and certifier of the EIR. Refer to BCHD Master Response 2 – BCHD as Lead Agency for detailed discussion and response to comments pertaining to this issue.

Comment MN87-9

The comment critiques BCHD for not utilizing a voter-approved bond for Project funding and expresses concern regarding funding for Phase 2 of the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for detailed discussion and response to comments pertaining to this issue.

Comment MN87-10

The comment notes that BCHD is currently not under legal obligation to retrofit the 514 building and suggests retrofitting and remodeling the structure is the responsible choice, presumably over demolition. Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to this issue.

Letter MN88

May 25, 2021
Mark Nelson

Comment MN88-1

The comment claims that the Beach Cities Health District (BCHD) is at fault for failure to fulfill California Public Records Act requests and has prevented intelligent participation. See response to Comment MN18-1. The comment is not germane to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures. In light of the COVID-19 pandemic, BCHD, as the lead agency, extended the requisite 45-day public review and comment period to 90 days, from March 10, 2021 through June 10, 2021. As such, adequate

public comment period has been provided. In accordance with CEQA Guidelines Section 15088, BCHD, as the lead agency, has reviewed all of the comments received on the Draft EIR for the proposed Project, and provided written responses. As an inclusion of the Final EIR, all of these comments are released with the Final EIR.

Letter MN89

May 27, 2021
Mark Nelson

Comment MN89-1

The comment correctly identifies Redondo Beach as a permitting authority for the required Conditional Use Permit (CUP) but states this fact discredits Table 3.1-1 which summarizes the heights of the tallest buildings in the Beach Cities and Torrance. The comment claims the only relevant heights are the 30-foot structures in proximity of the Project site. The comment states the proposed Project would be inconsistent with surrounding development and relevant zoning. The comment further states commercial use that would serve non-residents of Redondo Beach ca not be permitted. These issues are addressed in the response to Comment MN50-1.

Letter MN90

May 27, 2021
Mark Nelson

Comment MN90-1

The comment states BCHD has not fulfilled outstanding California Public Records Act requests and therefore has prevented intelligent public participation. The comment is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures. Refer to Comment Response MN18-1 and Master Response 15 – Purpose of Public Review.

Letter MN91

Comment MN91-1

The claims that outdoor nighttime lighting has peer-reviewed negative impacts of surrounding residents. The comment provides a photo of the streetlights and traffic lights at the intersection of North Prospect Avenue with the main entrance to the Project site, as well as security lighting within the Beach Cities Health District (BCHD) campus parking lots at nighttime, facing east from the west side of North Prospect Avenue. The comment then cites a study by Maurice M. Ohayon, MD, DSc, PhD and Cristina Milesi, PhD titled *Artificial Outdoor Nighttime Lights Associate with*

Altered Sleep Behavior in the American General Population, which is available here: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4863221/>. The EIR thoroughly details the existing sources of nighttime lighting at and in the vicinity of the Project site in Section 3.1, *Aesthetics and Visual Resources*. As described therein, existing uses in the immediate vicinity of the Project site contribute to nighttime lighting that is characteristic of suburban environment, including interior building illumination, streetlights, exterior security lighting, and vehicle lights. Adjacent commercial and residential buildings include both indoor and outdoor illumination of façades, along with indoor illumination of windows, balconies, and exterior lighting fixtures. Outdoor lighting sources include exterior light fixtures, which range from small fixtures from nearby residences to illuminated signs for the Vons and Shell gas station north of the site. Streetlights illuminate the sidewalks along both sides of North Prospect Avenue, the south side of Beryl Street, the east side of Flagler Lane, and the raised center media on Diamond Street.

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

The potential Project operational impacts on nighttime lighting are discussed under Impact VIS-3 in Section 3.1, *Aesthetics and Visual Resources*. Given that construction activities at the BCHD campus would occur between the hours of 7:30 a.m. and 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday, exterior construction lighting would generally not be required. If necessary, during the winter when the sun sets earlier or if otherwise necessary for security purposes, lighting would be shielded and directed into the interior of the Project site. Security fencing and the noise barriers required under Mitigation Measure (MM) NOI-1 would screen light sources from view of nearby sensitive receptors (e.g., neighboring single- and multi-family residences) and other passersby. Thus, temporary lighting associated with construction activities would not adversely affect daytime or nighttime views in the area.

The proposed Project would increase lighting associated with interior building illumination and outdoor lighting for nighttime security and wayfinding around and through the BCHD campus. Interior lighting would be designed with occupancy sensors and dimmers, where feasible and appropriate. Additionally, during the evening hours, interior lighting associated with the Assisted Living units and Memory Care units would be muted as a result of interior blinds, curtains, and other shades. Outdoor ground floor illumination would be limited to the entry plaza, outdoor

seating areas, and pedestrian pathways. Lighting in these areas would be low lying and directed toward the ground. As such, outdoor ground lighting would generally be contained within interior spaces of the Project site. Exterior outdoor lighting would also be further muted by proposed landscaping along the perimeters of the Project site.

The comment also states that BCHD must conduct cost-benefit analyses as well as investigate economic injustice and property value impacts for the last 60 years. Refer to Master Response 3 – Project Need and Benefits. Consistent with the requirements of the California Environmental Quality Act (CEQA), this EIR is an informational document that assesses the potential physical environmental impacts that could result from the foreseeable construction and operational activities resulting from the proposed adoption and implementation of the Healthy Living Campus Master Plan. CEQA does not require an exhaustive quantification of the value that BCHD provides to the community within the EIR. Nevertheless, a quantitative analysis of BCHD’s services can be found in the Community Health Report (<https://www.bchd.org/healthreport>) as well as the Priority-Based Annual Budgets (<https://www.bchd.org/operating-budgets>).

The comment goes on to assert that BCHD has no data to demonstrated local benefits compared to negative Environment Justice impacts. It should be noted that according to Office of Environmental Health Hazard Assessment (OEHHA) CalEnvironScreen tool, the Project site falls within the 10 to 15 percentile of Environmental Justice communities, as compared in inland areas of the Greater Los Angeles Area adjacent to regional freeways (e.g., I-405), which fall within the 90 to 100 percentile of Environmental Justice communities. This ranking is based on specific categories such as pollutant exposure, environmental effects, sensitive populations, and socioeconomic factors. While not specially a CEQA issue, the claim that BCHD operations have resulted in a disproportionate impact on an Environmental Justice community is unfounded.

Letter MN92

May 27, 2021
Mark Nelson

Comment MN92-1

The comment provides a graphic intended to indicate that south Redondo Beach would experience all economic and environmental justice impacts while only 5 percent of residents of the assisted living units would be from Redondo Beach. The analysis identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. Further, the comment narrowly focuses on the occupancy of the proposed Assisted Living

program and does not consider the community benefit of the Program of All-Inclusive Care for the Elderly (PACE) and Youth Wellness Center in Phase 1 or the Center for Health and Fitness (CHF), Aquatics Center, and Wellness Pavilion in Phase 2. Further, the comment fails to acknowledge that revenue generated as result of the proposed Project would support BCHD's broader range of community health and wellness programs and services provide to the Beach Cities and the nearby South Bay communities. Claims of environmental justice impacts are not applicable to the Project site, see Master Response 16- Environmental Justice for further details and discussion.

Letter MN93

May 28, 2021
Mark Nelson

Comment MN93-1

The comment provides citations to various studies and literature reviews related to traffic, noise, sirens, traffic-related air pollution, chronic stress, and negative health impacts. However, beyond discussing the issue of traffic, noise, and air pollution, neither the comment, nor any of the referenced studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. Refer to responses to Comment FL1-68 through Comment FL1-72, which provide the same links to various studies and literature reviews.

Letter MN94

May 29, 2021
Mark Nelson

Comment MN94-1

The comment claims that the use of the L_{eq} metric is inappropriate for evaluating noise. The comment goes on to claim that haul trucks, which typically generate traffic noise levels of 85 dBA L_{max} at 50 feet, would create a distraction to students. Refer to Comment Response FL-63 and Master Response 12 – Noise Analysis for a detailed discussion regarding the use of the L_{eq} metric in the analysis of construction-related noise impacts presented in 3.11, *Noise*.

Letter MN95

June 1, 2021
Mark Nelson

Comment MN95-1

The comment asserts that existing outdoor lighting at the Beach Cities Health District (BCHD) campus is in violation of the American Medical Association Guidelines. However, the comment fails to cite the specific guideline the comment is referring to and how BCHD is in violation. Further, the provided citation does not provide a clear connection between the environmental issue raised in the comment and the purported negative health impacts.

The comment goes on to claim that no health analysis of the negative impacts of lighting is presented in the Environmental Impact Report (EIR). The EIR thoroughly discloses and addresses the potential for impacts related to construction and operational lighting in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 and Impact VIS-3. As described therein, outdoor lighting would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with Redondo Beach Municipal Code (RBMC) Section 92.30.5 and these design guidelines. It should also be noted that the proposed Project would be subject to Redondo Beach Planning Commission Design Review prior to the issuance of building permits. During this review, the proposed lighting as well as the other reflective exterior façade elements of the proposed development, such as the fixed paneling, sunshade louvers, and windows would be designed to be consistent with the RBMC and prevent substantial glare. Project architectural design and materials would be intended to minimize the lighting and glare consistent with the requirements of the RBMC.

Letter MN96

June 1, 2021
Mark Nelson

Comment MN96-1

The comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Under the proposed Project the proposed Assisted Living program and Memory Care community would continue to be operated in accordance with Federal, State, and local health guidelines in effect at the time. It should be noted that this continues to be the case for the Beach Cities Silverado Memory Care Community on the existing Beach Cities Health District (BCHD) campus.

Letter MN97

June 1, 2021
Mark Nelson

Comment MN97-1

The comment states the Environmental Impact Report (EIR) is defective and must be recirculated because it fails to identify the proposed Project is inconsistent with C-2 (Commercial) zoning. Refer to the response to Comment Letter WB regarding the revisions to the building footprint and floor area ratio (FAR). This minor revision does not meet any of the triggers for recirculation described under California Environmental Quality Act (CEQA) Guidelines 15088.5.

Letter MN98

June 1, 2021
Mark Nelson

Comment MN98-1

The comment states the proposed Project fails to meet a guiding principle to include perimeter parking. The comment includes a graphic of the referenced of the referenced guiding principles as provided during Community Working Group (CWG) meetings. It is important to note that the comment addresses early conceptual planning efforts and does not address the project objectives referenced as presented in Section 2.4, *Project Objectives*. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

Letter MN99

June 2, 2021
Mark Nelson

Comment MN99-1

The comment states that Beach Cities Health District (BCHD) has failed to fulfill over 80 California Public Records Act requests and by such, has prevented intelligent public participation. Refer to the response to Comment MN18-1. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

Letter MN100

June 4, 2021
Mark Nelson

Comment MN100-1

The comment provides a citation to an article that describes the production of concrete as a major emitter of carbon dioxide. The article identifies cement made from limestone as a central ingredient of concrete. The article describes “[w]hen heated, the calcium carbonate in limestone breaks into calcium oxide and carbon dioxide, which is released into the air. The calcium oxide is ground with limestone and gypsum to make cement.” The comment then incorrectly asserts the Draft Environmental Impact Report’s (EIR’s) analysis of greenhouse gas (GHG) impacts is defective because the analysis does not account for concrete construction.

As clearly acknowledged in Section 3.7.1, *Environmental Setting*, “[t]he natural production and absorption of CO₂ occurs through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, trees and wood products, and as a result of other chemical reactions, such as those required to manufacture cement.”

GHG emissions associated with the construction and operation of the proposed Project were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 and standard methodologies for modeling such emissions. CalEEMod was developed in collaboration with the air districts of California and is recommended by South Coast Air Quality Management District (SCAQMD). Regional data (e.g., emission factors, meteorology, source inventory, etc.) have been provided by the various California air districts and Southern California Association of Governments (SCAG) to account for local requirements and conditions. The model quantifies direct emissions from construction and operations – including vehicle use – as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. As such, the EIR provides adequate and sufficient analysis of GHG emissions associated with the proposed Project.

Letter MN101

June 4, 2021
Mark Nelson

Comment MN101-1

The comment claims that analysis of representative views is insufficient. Please see Comment Response MN15-1 for discussion of the sufficiency of representative views analyzed in Section 3.1, *Aesthetics and Visual Resources*. To fully and accurately assess impacts associated with proposed development, the Environmental Impact Report (EIR) includes an assessment of computer-generated photosimulations independently prepared for the EIR by VIZf/x, licensed architects and visual simulation specialists, for the Phase 1 preliminary site development plan. The EIR also includes representative views, prepared by Paul Murdoch Architects, in coordination with

the CEQA Project Management Team, of possible development under the Phase 2 development program (i.e., Community Health and Wellness Center, a parking structure, an Aquatics Center, a Center for Health and Fitness [CHF], a medical office building) from public areas immediately adjacent to the Project site including North Prospect Avenue, North Prospect Avenue and Diamond Street, Flagler Lane and Tower Street. These photosimulations and representative views were reviewed in the context of the development standards under the Redondo Beach and Torrance General Plans and municipal codes. To evaluate potential changes to visual resources, a total of six representative views were identified with input from the City of Redondo Beach. Views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity.

These six representative views encircle the campus and provide west, southwest, south, and northeast facing views of the Project site. As described, these views were identified with input from the City of Redondo Beach and offer a range of public views from different areas of the surrounding neighborhoods and include views of various elements of the proposed Project, such as the proposed Residential Care for the Elderly (RCFE) building, ornamental landscaping, and the steep grade and retaining wall located on the Project site's eastern border.

For example, representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represent views of the Project site from the residential neighborhood within Torrance adjacent to the east of the Project site. Likewise, representative view 2 was selected because it represents the view of the steep grade, retaining walls, and landscaped vegetation along the eastern border of the Project site, which is visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street.

As such, the representative views and subsequent analysis included in the EIR provide a sufficient depiction and assessment of how public views would be affected by proposed development. Refer to BCHD Master Response 9 – Aesthetics and Visual Resources for a detailed discussion and response to comments pertaining to this issue.

Comment MN101-2

The comment suggests that Project development would adversely affect property values of nearby homes. As described in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, CEQA requires and EIR analysis “...identify and focus on the significant environmental effects of a proposed project” (CEQA Guidelines 15126.2[a] and Public Resources Code Section 21000[a]). CEQA Guidelines Section 15382 defines “significant effect on the environment” as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the topic area

affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.” Accordingly, the EIR analyzes the potential “physical” adverse effects of a proposed Project. Property value loss in and of itself is not a physical impact required to be included in a CEQA analysis. The EIR includes adequate analysis under CEQA for community services and population and housing, including Section 3.12, *Population and Housing*, Section 3.13, *Public Services*, Section 3.15, *Utilities and Service Systems*, and Section 4.0, *Other CEQA Considerations*, as well as the impacts that physical changes of the Project may have on a community, including Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.10, *Land Use and Planning*, Section 3.11, *Noise*, and Section 3.14, *Transportation*.

Comment MN101-3

The comment suggests that the Beach Cities Health District (BCHD) is not qualified to act as the lead agency for the proposed Project. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

Comment MN101-4

The comment implies that the EIR does not follow local standards and therefore does not meet CEQA requirements; however, it is not clear what standards are being referenced. The EIR includes consistency analysis of all applicable local policies and regulations. Each section of the EIR includes a regulatory setting that identifies local policies and regulations. The subsequent analysis includes proposed Project consistency with these local policies including the Redondo Beach General Plan, Torrance General Plan, Redondo Beach Design Guidelines Redondo Beach Municipal Code, and Torrance Municipal Code. While not required, the Aesthetics and Visual Resources section also analyzed consistency with the *City of Los Angeles CEQA Thresholds Guide (2006)* after public scoping efforts found there was general concern regarding shade and shadow impacts that might occur under the proposed Project. CEQA Guidelines do not require analysis of shade and shadow impacts or provide thresholds to measure such impacts. Neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. However, the EIR provides analysis of shade and shadow impacts based on thresholds set forth in the *City of Los Angeles CEQA Thresholds Guide (2006)*.

Letter MN102

June 5, 2021
Mark Nelson

Comment MN102-1

The comment incorrectly claims that the EIR does not include analysis of the health impacts associated with a variety of potential Project impacts and other topics, such as criteria pollutant and toxic air contaminant (TAC) emissions, light and glare, contaminated water, noise, and traffic safety. This comment fails to acknowledge the technical studies, including exhaustive modeling and sampling efforts provided the EIR. The comment does not challenge any specific aspects of the analyses provided in the EIR or provide any substantiating evidence to further support its assertions.

Letter MN103

June 5, 2021
Mark Nelson

Comment MN103-1

The comment references peer-reviewed research submitted in previous comments and states the Environmental Impact Report (EIR) is defective for failure to analyze impacts mental and physical health impacts that would occur under the proposed Project. The comment further asserts that the EIR includes no discussion of cardiovascular, pulmonary, mental health, particulate matter, and other health effects. However, as described in these comment responses, these claims are unsubstantiated and unfounded. The comment further cites the *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 and the court's conclusions regarding the EIR's air quality analysis. The EIR was prepared pursuant to the CEQA Guidelines and includes thorough, detailed analysis of the potential impacts on various resources, including impacts on air quality and the associated potential effects of the proposed Project on human health. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

Comment MN103-2

The comment asserts the proposed Project would have negative impacts related to nighttime lighting, release of particulate matter emissions, and noise. These issues are addressed in Section 3.1, *Aesthetics and Visual Resources*, Section 3.2, *Air Quality*, and Section 3.11, *Noise*. The comment again references concerns brought up in previous comments. These comments have been reviewed and responded to and included in the Final EIR.

Comment MN103-3

The comment states the EIR must be remediated and recirculated and again references the court case *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

Letter MN104

June 5, 2021
Mark Nelson

Comment MN104-1

The comment includes a California Public Records Act Request to Beach Cities Health District (BCHD) regarding studies correlating between health damages/environmental impacts and potential impacts of the proposed Project. This comment is not germane to the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. The EIR thoroughly discloses and addresses the potential health and environmental impacts associated with construction-related air emissions, shade/shadow, light and glare, noise, and hazardous materials and wastes on-site as well as other potential Project impacts. Refer to the response to Comment MN102-1.

Letter MN105

June 6, 2021
Mark Nelson

Comment MN105-1

The comment claims, without substantial evidence, that the traffic analysis in the Environmental Impact Report (EIR) is defective and fails to meet the City of Redondo's request. However, contrary to this assertion, the scope and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. Input from the cities was solicited in multiple meetings including on September 20, 2019 and December 12, 2019. An analytical approach was confirmed through feedback received on two technical memoranda focused on trip generation, trip distribution, and vehicle miles traveled (VMT) analysis. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to this issue.

Letter MN106

June 6, 2021

Mark Nelson

Comment MN106-1

The comment contests a statement provided on the Beach Cities Health District (BCHD) website, claiming that BCHD has not harmed the surrounding community for 60 years. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment proceeds to identify the comments contained in MN106-2 through MN106-20 as concerning BCHD's moral obligation to protect the surrounding community and expresses desire that they be recorded in the EIR. These comments have been noted and incorporated into the Final EIR as a part of the responses to comment.

Comment MN106-2

The comment claims for over 60 years, construction and operational activities of the existing BCHD and former South Bay Hospital damaged surrounding neighborhoods through “*excavation and hauling; construction traffic, worker commuting, and heavy trucking; 510 and 520 medical office building construction; room additions to the 514 building; excess traffic and related safety hazards; excess tailpipe exhaust, including carbon monoxide, nitrogen oxides, ozone, tetraethyl lead, and long chain hydrocarbons; excess PM_{2.5} and PM₁₀ particulates; excess site noise; excess emergency vehicle traffic with lights and sirens; excess outdoor nighttime lighting from signage and parking lots lights; daytime shadows; restricted sunlight; reflections; localized heat islanding; neighborhood privacy invasion; neighborhood chronic stress (Bluezones "silent killer"); environmental injustice; economic injustice; reduced housing prices; negative externalities; and a host of other negative impacts.*” This comment makes no reference to activities associated with the proposed Project and does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Further, the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

Comment MN106-3

The comment claims the BCHD Chief Executive Officer (CEO) was directed include public comments received on the Draft EIR into the Final EIR. All public comments were posted after the close of the public comment period. Consistent with CEQA Guidelines Section 15088 of the State, all of the comments received on the Draft EIR, including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on

March 24, 2021, April 13, 2021, and April 17, 2021, were reviewed and responded to, as appropriate.

Comment MN106-4

The comment summarizes a statement communicated between BCHD and the Redondo Beach City Attorney regarding the benefit of the proposed Project. Refer to the response to Comment MN23-2.

Comment MN106-5

The comment incorrectly states the former South Bay Hospital and existing Beach Cities Health District campus have caused environmental and economic justice impacts to surrounding neighborhoods, including the Beryl Heights Neighborhood and Towers Elementary School, for over 60 years. Refer to the response to Comment MN106-2. Again, it should be noted that the Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

The comment goes on to state that the existing BCHD campus has historically, and the proposed Project would create excess traffic-induced safety hazards. However, the comment does not specify any such hazard and fails to acknowledge that traffic safety hazards are already addressed in EIR. Section 3.14, *Transportation* under Impact T-3 describes impacts on traffic and roadway and pedestrian safety. Implementation of Mitigation Measure (MM) T-2 would require the preparation of Construction a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety avoid construction-related safety. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues. The comment provides citations to various studies and articles related to traffic and pedestrian safety and nocturnal road traffic noise. However, beyond discussion the issue of traffic, neither the comment, nor any of the referenced material provide a clear relationship to the proposed Project or the environmental analysis provided in the EIR. For example, the study *Road Traffic Safety: An analysis of the cross-effects of economic road and population factors* describes data collected on traffic accidents in 31 provinces and cities in China from 2004 to 2016 and concludes the increase of gross domestic product and traffic investment can significantly reduce the number of road traffic casualties in China. This study was also cited in Comment FL2-12. The remaining studies regarding pedestrian safety largely provide quantitative analysis of demographics of pedestrian injury and mortality rates. None of the referenced studies or articles conflict with the EIR’s analysis

or suggest an element of the proposed Project has not been sufficiently reviewed. Regarding nocturnal traffic noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would constitute a less than significant impact.

Comment MN106-6

The comment provides citations to various studies and articles related to vehicular emissions or more general air pollution. These articles go on to describe the relation between pollutants and negative health effects related to cardiovascular health, child development, cancers and respiratory disease. However, none of the referenced studies or literature reviews conflict with the analysis. As described in Master Response 10 – Air Quality Analysis, an exhaustive air quality modeling effort was conducted to evaluate construction and operational air emissions associated with the proposed Project. Construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts, including mobile source emissions associated with vehicle trips to and from the Project site, are addressed in Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District’s (SCAQMD’s) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD mass daily significance thresholds for operation, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

Comment MN106-7

The comment provides citations to various studies and articles related to noise pollution and public health, emergency alarms and stress, and traffic noise. Additionally, *Experimental Chronic Noise Is Related to Elevated Fecal Corticosteroid Metabolites in Lekking Male Greater Sage-Grouse (Centrocercus urophasianus)* and *Effects of traffic noise exposure on corticosterone, glutathione and tonic immobility in chicks of a precocial bird describes how noise can affect the habitat patterns and stress response of two bird species (greater sage-grouse and Japanese quail [Coturnix japonica] respectively)*.

However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* including the detailed quantitative noise modeling effort. Further, regarding nocturnal traffic noise, the quantitative noise analysis provided in Section 3.11, *Noise*

demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would constitute a less than significant impact.

Comment MN106-8

The comment provides citations to various studies related to glare or the reflectivity of buildings. Neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of Project impacts with nighttime lighting and glare issues in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to glare issues. Neither the comment nor the citations provide any detail that would suggest the EIR analysis is insufficient.

Comment MN106-9

The comment provides citations to various articles and literature reviews regarding health benefits of sunlight and natural lighting with one article (*Place value: place quality and its impact on health, social, economic and environmental outcomes*) describing the more general link between place quality and link to health, social, economic, and environment effects. Neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of Project impacts to shade and shadow effects in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues. Neither the comment nor the citations provide any clear detail that would suggest the EIR analysis is insufficient.

Comment MN106-10

The comment provides citations to various studies and articles related to nighttime lighting. The cited studies address a range of topics including nighttime or artificial lighting’s relationship to bats, circadian rhythm, teen sleep and mood, light pollution, and attraction of disease-carrying pests. However, neither the comment nor these citations provide a clear connection to the proposed Project or the environmental impact analysis in the EIR. The EIR includes detailed consideration and analysis of potential impacts associated with nighttime lighting and glare issues in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and a response to comments pertaining to glare issues.

Comment MN106-11

The comment provides citations to various studies and articles related to noise, sleep, and health. However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.11, *Noise* which is supported by an exhaustive quantitative noise modeling effort. Further, regarding nocturnal traffic noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would constitute a less than significant impact.

Comment MN106-12

The comment provides citations to two news articles related to rising crime rates among homeless populations of Los Angeles, one of which was specific to the year 2018, and a guide on homeless encampments provided by Arizona State University. There is no clear connection between the materials cited and the proposed Project. None of the material provides any mention of Redondo Beach, Torrance, construction activities, redevelopment, or operation of a similar campus-type facilities.

Comment MN106-13

The comment provides citations to various studies and referential material related to fugitive dust, particulate matter (PM), and adverse respiratory health effects. However, the findings of these reviews do not conflict with or challenge any specific aspects of the analysis provided in Section 3.2, *Air Quality*. As described therein, impacts associated with temporary, but prolonged construction-related impacts are addressed under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed under Impact AQ-3. Each of these impact descriptions conservatively address the nearest sensitive receptors including on-site sensitive receptors, adjacent residents, and schools. With the implementation of MM AQ-1 construction-related emissions would be less than the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. None of the references cited conflict with or challenge any of the findings of the quantitative air quality assessment, including the construction health risk assessment (HRA).

Comment MN106-14

The comment provides citations to various studies and articles related to noise, sleep disturbance, traffic noise and health including *Environmental noise and sleep disturbances: a threat to health*, *A Multilevel Analysis of Perceived Noise Pollution, Auditory and non-auditory effects of noise on health*, *Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality* included in Comment MN106-11 and *Environmental Stressors: The Mental Health Impacts of Living Near Industrial Activity* included in Comment MN106-19. Refer to these individual response to these comments for a detailed discussion and response to comments.

Comment MN106-15

The comment includes citations to articles and studies related to asbestos-containing material (ACM). However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.8, *Hazards and Hazardous Materials*. For example, *Asbestos Exposure among Construction Workers During Demolition of Old Houses in Tehran, Iran* evaluates asbestos exposure specifically among construction workers in Tehran, Iran. This article is also cited in Comment FL2-22. The article *Can Buildings Be Demolished Safely Without Asbestos Abatement* explores the possibility that structures in Detroit, Michigan may be able to be safely demolished without the additional cost of asbestos abatement. This article is also cited in Comment FL2-22. The comment also cites the U.S. Environmental Protection Agency's (USEPA's) *Scope of Risk Evaluation for Asbestos and Guidelines for Enhanced Management of Asbestos in Water at Ordered Demolition* but makes no indication that the proposed activities or mitigation measures is insufficient with referenced standards. *Estimating the Additional Greenhouse Gas Emissions in Korea: Focused on Demolition of Asbestos Containing Materials in Building* describes greenhouse gas (GHG) emissions occur during removal of ACM due to operation of construction equipment and truck trips. However, construction GHG emissions modeling described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, already describes GHG emissions associated with planned construction activities, including those that would occur with building demolition and asbestos abatement.

As described in Section 3.8, *Hazards and Hazardous Materials* under Impact HAZ-1, prior to demolition of existing structures with the potential to contain hazardous materials surveys would be conducted by a licensed contractor(s). If hazardous material is found, all applicable Federal, State, and local codes and regulations and best management practices related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds would be followed to ensure public safety, such as sealing off an area and filtering effected air. Adherence to these regulations and best management practices (BMPs) would ensure that impacts associated with the proposed Project

would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment MN106-16

The comment provides citations to various studies related to hazardous material and stormwater drainage. However, none of the referenced conflict with or challenge any specific aspects of the analysis provided in Section 3.8, *Hazards and Hazardous Materials* or Section 3.9, *Hydrology and Water Quality*. For example, *Storm water contamination and its effect on the quality of urban surface waters* describe stormwater drainage and surface water pollutants within the sewage system of a city in Poland. The aim of the analyses was to explain to what extent pollutants found in storm water runoff from the studied catchments affected the quality of surface waters and whether it threatened the aquatic organisms. This study was also cited in Comment FL2-24.

The comment also fails to acknowledge that the EIR includes analysis of stormwater runoff in Section 3.9, *Hydrology and Water Quality* and potential hazards and hazardous materials in Section 3.8, *Hazards and Hazardous Materials*. As described therein and summarized in Master Response 11 – Hazards and Hazardous Materials Analysis, the prepared Phase I Environmental Site Assessment (ESA) identified potential sources of contamination. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of these ESAs, the EIR describes compliance with applicable regulations and standards, BMPs, and required mitigation measures to address these conditions and ensure that impacts associated with the proposed Project would be less than significant. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment MN106-17

The comment provides citations for two articles with no clear connection to the proposed Project or the EIR analysis. *Designing for invisible injuries: An exploration of healing environments for posttraumatic stress* describes architecture and design strategies for creating empathetic spaces for veterans with post-traumatic stress disorder. *Trauma Informed Community Building* describes a Trauma Informed Community Building approach in community development. The comment includes the clause “*reduced visual privacy*” but this issues is not elaborated on further in the article.

Comment MN106-18

The comment also provides citations to various studies related to health effects of traffic noise, nighttime noise, and general noise exposure, including cardiovascular responses in young adults. However, beyond discussing the issue of noise, the referenced studies do not provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR. For example, *The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk* discusses long-term exposure to roadway noise, aircraft noise, and railroad noise. The comment fails to acknowledge that noise impacts are addressed in detail within the EIR, which concludes that with the exception of temporary, but prolonged construction-related noise, these impacts would be less than significant. This study is also reference in Comment FL1-69, Comment FL2-9, Comment FL2-26, and Comment MN73-1.

Comment MN106-19

The comment provides citations to various studies and literature reviews related to stress management/avoidance strategies, traffic noise, traffic-related air pollution and stress. However, beyond discussing the issues of traffic, noise, and air quality neither the comment, nor any of these studies provide a clear relationship to the proposed Project or the environmental impact analysis provided in the EIR.

For example, *Traffic-Related Air Pollution and Stress: Effects on Asthma* provides very specific clarifications on another study *Chronic Traffic-Related Air Pollution and Stress Interact to Predict Biologic and Clinical Outcomes in Asthma*. This latter study determined that physical and social environments interacted in predicting, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress. Importantly, this study did not measure any increases in stress in children as a result of traffic. Additionally, the study acknowledges limitations including small sample size, varying time frame for measures, and pollution estimates using land using models that are best suited for long-term exposure. This study is also reference in Comment FL1-70 and Comment FL2-10.

As Master Response 14 – Transportation Analysis, the EIR provided a detailed trip generation analysis and an exhaustive quantitative modeling effort. Implementation of the Phase 1 preliminary site development plan is estimated to reduce existing trip generation by approximately 1,919 daily trips, 235 AM peak period trips, and 158 PM peak period trips (refer to Table 3.14-6). This is in part because Phase 1 of the proposed Project would replace high trip generating land uses (e.g., medical office) with lower trip generating land uses (e.g., Assisted Living units). This reduction in daily vehicle trips as a result of Phase 1 is also attributed to the demolition of most of the existing

uses within the Beach Cities Health Center and the construction of only a small portion of the proposed Healthy Living Campus Master Plan. After completion of Phase 2, however, the proposed Project is expected to generate a total of 3,360 daily vehicle trips, including 271 AM peak period trips and 195 PM peak period trips (refer to Table 3.14-7). After accounting for existing trips being removed from the roadway network, the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program – would generate a net increase of 376 new daily trips as compared with existing conditions.

None of the referenced studies suggest that this level of operational traffic would result in traffic-related stress, noise, or air quality impacts. With regard to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant. With regard to transportation-related air quality impacts, the quantitative analysis demonstrates that criteria air pollutant emissions and TACs would be less than SCAQMD’s thresholds.

Comment MN106-20

The comment reiterates previous claims that the existing BCHD campus and the former South Bay Hospital have damaged the surrounding environment and inaccurately claims these facilities created economic and environmental justice impacts. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and not supported by the public record. Refer to Master Response 16 – Environmental Justice.

The comment states BCHD was never voter approved. The comment states that if the issues described in Comment MN106-2 through MN106-19 are not addressed, or the proposed Project’s request for a Conditional Use Permit (CUP) must be rejected and a public vote enacted. However, the legal requirement for this suggested public vote is unfounded.

Letter MN107

June 8, 2021
Mark Nelson

Comment MN107-1

The comment summarizes a California Supreme Court ruling that describes an Environmental Impact Report (EIR) must provide sufficient detail to enable readers to understand and to consider meaningfully the issues that the proposed Project raises, and make a reasonable effort to substantially connect the proposed Project’s significant air quality impacts to likely health

consequences. The comment further states the EIR has failed to substantially connect the impacts under the proposed Project, particularly air quality impacts, to health consequences. Contrary to this commenter's assertion, air quality impacts and health consequences are clearly described in the EIR and supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

Comment MN107-2

The comment notes that the Beach Cities Health District (BCHD) is a California Health District and recognizes its goals to enhance community health and eliminate the existing seismic risk. The comment claims, without substantial evidence, that BCHD has failed to evaluate cost-effectiveness of provided services and programs. The comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to BCHD Master Response 6 – Financial Feasibility/Assurance.

Comment MN107-3

The comment claims the EIR is defective due to failure to examine environmental and health damages associated with the proposed Project but fails to specify details what these damages the EIR has not sufficiently assessed. The comment contests BCHD's role as a lead agency and validity of benefits under the proposed Project. The EIR was prepared pursuant to the CEQA Guidelines and includes thorough, detailed analysis of Project impacts on various resources, including impacts on air quality, noise, land use compatibility, and hazards and hazardous materials, which takes into consideration and assesses the Project's potential effects on human health with regard to each of these resources. Refer to Master Response 2 – BCHD as Lead Agency for detailed discussion and a response to comments pertaining to BCHD's role as the Lead Agency.

Comment MN107-4

The comment states it is incumbent on the City of Redondo Beach, City of Torrance, Redondo Beach Unified School District, and Torrance Unified School District to provide comments to BCHD and ensure compliance with California Supreme Court ruling which held that an EIR must (1) include sufficient detail to enable readers to understand and to consider meaningfully the issues that the proposed project raises; and, (2) make a reasonable effort to substantively connect the Project's significant air quality impacts to likely health consequences. The comment again asserts, without substantial evidence, that the EIR has failed to sufficiently analyze health impacts associated with the proposed Project. Contrary to this commenter's assertion, air quality impacts

and health consequences are clearly described in the EIR and supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

Comment MN107-5

The comment claims that the reduction of sky views and sunlight, and shade and shadow impacts correlate to physical and mental health impacts. The comment fails to provide any further detail or evidence clearly describing how the proposed Project would contribute to such health effects. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining potential impacts to aesthetics and visual resources.

Comment MN107-6

The comment claims significant intermittent noise correlate to physical and mental health effects, American Disability Act and 504 plan violations, but fails to provide any evidence to support these claims or describe how such effects would relate to the proposed Project. Refer to Master Response 12 – Noise Analysis for additional detail regarding the noise analysis, which is supported by an exhaustive quantitative modeling effort.

Comment MN107-7

The comment claims incremental air emissions is correlated with physical and mental health effects especially to children, elderly and the disabled, but fails to provide any evidence to support these claims or describe how such effects would relate to the proposed Project. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments regarding construction and operational impacts on air quality, including impacts to sensitive receptors.

Comment MN107-8

The comment claims, without substantial evidence or expert opinion, that reduced recreation at Towers Elementary School would correlate with physical and mental health impacts but again fails to provide any substantial evidence to support these claims or describe how such effects would relate to the proposed Project.

Letter MN108

June 8, 2021
Mark Nelson

Comment 108-1

The comment identifies and describes seven parcels within the City of Redondo Beach that have a P-CF (Community Facility) zoning and land use designation. Refer to the response to Comment FL1-20 as well as Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and land use designation.

Comment MN108-2

The comment states BCHD has a moral obligation to protect the community standard and claims the operation of the former South Bay Hospital District and BCHD campus have created environmental and economic justice impacts. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN108-3

The comment states average height should be the metric considered for future redevelopment requiring a Conditional Use Permit (CUP) on a P-CF zoned site. Refer to the response to Comment MN30-4.

Comment MN108-4

The comment includes an excerpt from Redondo Beach Municipal Code (RBMC) 10-2.2506 which has to do with CUPs. The comment asserts that neither existing or proposed development at the Project site conform with criteria for a CUP due to the size and height of the structures. The comment further asserts the proposed Project would be not comply with CUP criteria based on height, noise, invasions of privacy, and excess generated traffic. The comment further asserts the proposed Project is inconsistent with Residential Design Guidelines for the Beryl Heights neighborhood. Again, it should be noted that the Project site is not located in the Beryl Heights Neighborhood and the Residential Design Guidelines do not apply to the Project site. Refer to the response to Comment MN48-1.

See Comment Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussions and response to comments pertaining to the compatibility of the proposed Project with the P-CF zoning and issuance of a CUP. Further, aesthetic impacts related to height and privacy concerns, noise impacts, and traffic impacts are addressed in detail in Section 3.1, *Aesthetic and Visual Resources*, Section 3.11, *Noise*, and Section 3.14, *Transportation*

respectively. These analyses are supported by technical studies and exhaustive modeling efforts prepared by experts in their fields.

Letter MN109

June 9, 2021
Mark Nelson

Comment MN109-1

The comment states Phase 2 of proposed Project is ill-defined and the Master Plan is not part of the Draft Environmental Impact Report (EIR). The comment concludes, without substantial evidence, that the Draft EIR is defective and must be remediated and recirculated. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion regarding the more general and programmatic nature of Phase 2 of the proposed Project. no substantial evidence has been provided to suggest that any of the triggers for recirculation described under California Environmental Quality Act (CEQA) Guidelines 15088.5 have been met.

Letter MN110

June 9, 2021
Mark Nelson

Comment MN110-1

The comment states the Environmental Impact Report (EIR) is defective and must be recirculated because the EIR does not include an alternative that would involve development on the vacant Flagler Lot that conforms with Redondo Beach guidelines for C-2 zoning. Refer to the response to Comment MN97-1.

Letter MN111

June 9, 2021
Mark Nelson

Comment MN111-1

The comment states the Environmental Impact Report (EIR) must be amended for Phase 2 of the proposed Project. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for detailed discussion regarding the more general and programmatic nature of Phase 2 of the proposed Project.

Letter MN112

Comment MN112-1

The comment states, without substantial evidence, that the environmental Impact Report (EIR) is defective and should be revised and recirculated. The comment fails to provide specifications or further details regarding how or why the EIR analysis is insufficient in this regard.

Comment MN112-2

The comment claims the Draft EIR does not provide sufficient detail of negative health and environmental impacts associated with incremental emissions, denial of sunlight to residential and recreational uses, noise, vibration, glare, excess nighttime lighting. However, the comment fails to specify any such health impacts and remains speculative. The comment states the EIR is flawed for not considering impacts to recreational resources, including shade and shadow impacts to recreation fields of Towers Elementary School. However, the EIR does include consideration of impacts to recreation and recreational amenities in Section 4.0, *Other CEQA Considerations*. Pursuant to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, impacts of a proposed project on recreational resources are characterized as:

- a) A resulting increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and
- b) The development of recreational facilities or the construction or expansion of recreational facilities which would result in adverse physical effects on the environment.

As described in Section 4.5, *Effects Found Not to Be Significant*, the proposed Project does not involve the development of recreational facilities and would not substantially increase demand on existing recreational facilities. As a result, the proposed Project would not cause a significant impact on recreation or recreational amenities and additional analysis of the topic is not required. Potential impacts of construction air quality, noise and vibration, transportation, glare, nighttime lighting, and shadow effects are discussed in relevant sections of the EIR, including Section 3.2, *Air Quality*, Section 3.11, *Noise*, Section 3.14, *Transportation*, and Section 3.1, *Aesthetics and Visual Resources*, respectively.

Letter MN113

June 10, 2021
Mark Nelson

Comment MN113-1

The comment states that the Beach Cities Health District (BCHD) has outstanding California Public Records requests and claims BCHD is actively thwarting intelligent public participation. Refer to the response to Comment MN18-1 as well as Master Response 15 – Purpose of Public Review.

Letter MN114

June 10, 2021
Mark Nelson

Comment MN114-1

The comment incorrectly states that Environmental Impact Report (EIR) does not sufficiently analyze health impacts on children in relation to air quality impacts and therefore must be remediated and recirculated. Contrary to this commenter’s assertion, air quality impacts and health consequences are clearly described in the EIR and supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to the individual response to Comment TRAO-29 and Comment SL4-8.

Letter MN115

June 10, 2021
Mark Nelson

Comment MN115-1

The comment asserts that the Draft Environmental Impact Report (EIR) insufficiently assess existing traffic conditions and suggests the proposed parking structure would result in significant adverse traffic impacts. The comment goes on to provide anecdotal photographs including incidents of vehicles parking the wrong way along roadway frontages and asserts congestion at the BCHD entrance is the cause. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to these issues. However, contrary to the commenter’s assertion, Section 3.14, *Transportation* also provides a detailed analysis of potential operational design hazards and accident potential. As described more fully in Section 3.14.1, *Environmental Setting*, a collision analysis using data collected from the Statewide Integrated Traffic Records System (SWITRS) was conducted for intersections surrounding the proposed Project.

Comment MN115-2

The comment inaccurately claims the historic operation of the South Bay Hospital District and existing BCHD campus have subjected surrounding neighborhoods to environmental justice impacts including chronic stress for over 60 years. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue.

Comment MN115-3

The comment claims BCHD deliberately minimized public participation and provides an image of an editorial piece written by local Bob Pinzler critiquing BCHD’s progression of the proposed Project during the COVID-19 pandemic. It should be noted that every effort has been made to increase public participation. For example, five scoping meetings, an unusually high number, were held for the proposed Project. While CEQA Guidelines Section 15105 requires a 45-day comment public review period for a Draft EIR, BCHD, as the lead agency, extended the requisite 45-day public review and comment period to 90 days, from March 10, 2021 through June 10, 2021. BCHD also hosted three public meetings for the Draft EIR. As such, adequate opportunity for public comment has been provided above and beyond the requirements of CEQA.

Comment MN115-4

The comment again claims, with no substantial evidence, that the historic operation of the South Bay Hospital District and existing BCHD campus have subjected surrounding neighborhoods to environmental justice impacts including light and sirens for over 60 years. T The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded and unsupported by the public record. Refer to Master Response 16 – Environmental Justice for a detailed discussion and response to comments pertaining to this issue. Further, it should also be noted that the EIR does include a robust discussion potential noise impacts related to emergency medical response. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to this issue.

Letter MN116

June 10, 2021
Mark Nelson

Comment MN116-1

The comment expresses opposition to BCHD acting as the lead agency. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

Letter MN117

June 10, 2021
Mark Nelson

Comment MN117-1

The comment expresses opposition to BCHD acting as the lead agency. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

Comment MN117-2

The comment states that all of the previous held scoping meetings were required. As described in Comment MN115-3 adequate opportunity for public comment has been provided above and beyond the requirements of CEQA.

Comment MN117-3

The comment again expresses opposition to BCHD acting as the lead agency. Refer to Master Response 2 – BCHD as Lead Agency for a detailed discussion and response to comments pertaining to this issue.

Letter MN118

June 10, 2021
Mark Nelson

Comment MN118-1

The comment claims operation of the former South Bay Hospital and existing Beach Cities Health District (BCHD) campus has created impacts related to “*operation with significant excavation, initial construction, 510 and 520 building construction, excess traffic and hazards, excess tailpipe exhaust and particulate matter (PM), excess noise, excess sirens, excess outdoor nighttime lighting from both signage and parking lots, shadows, reflections, heat islanding, privacy invasion, chronic stress (Bluezones ‘silent killer’), environmental injustice, economic injustice, and a host of other negative impacts.*” The comment includes various citations including the BCHD Frequently Asked

Questions (FAQ) webpage and articles on stress but makes no clear connection between the cited material and the proposed Project. The comment focuses on perceived grievances from past or current operations but does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, the EIR includes adequate analysis of impacts for community services and population and housing, including Section 3.12, *Population and Housing*, Section 3.13, *Public Services*, Section 3.15, *Utilities and Service Systems*, and Section 4.0, *Other CEQA Considerations*, as well as the impacts that physical changes of the Project may have on a community, including Section 3.1, *Aesthetics and Visual Resources* (e.g., lighting, glare, shading, privacy), Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.9, *Hydrology and Water Quality*, Section 3.10, *Land Use and Planning*, Section 3.11, *Noise*, and Section 3.14, *Transportation*.

The comment also contests that the proposed Project would benefit the community and critiques BCHD's lack of investigation of environmental justice impacts. Purpose and need for the proposed Project is discussed further in BCHD Master Response 3 – Project Need and Benefit. The Project site is not located within an environmental justice community and claims of environmental injustice are unfounded. See Master Response 16- Environmental Justice for further detail.

Comment MN118-2

The comment states the EIR is required to assess negative health effects of PM_{2.5} emissions, particularly to children attending nearby schools. As shown in Table 3.2-4 the EIR clearly considers adjacent recreational land uses and schools – including Towers Elementary School located at a distance of 350 feet from the edge of the BCHD campus. Impacts associated with temporary, but prolonged construction-related impacts are addressed in Section 3.2, *Air Quality* under Impact AQ-2 and Impact AQ-4. Operational air quality impacts are addressed in Impact AQ-3. With the implementation of MM AQ-1 construction-related emissions would be less than the South Coast Air Quality Management District (SCAQMD) thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin. As described in Impact AQ-3, peak daily criteria pollutant emissions from operation of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for operation. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to these issues. The comment also provides a citation to the study *Cardiovascular Effects of Environmental Noise Exposure* which is addressed in Comment MN118-4.

Comment MN118-3

The comment incorrectly states that the EIR is obligated to address environmental and economic justice impacts. However, contrary to the commenter's asserting, CEQA Guidelines Section 15131, also specifically states "[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."

Comment MN118-4

The comment summarizes *Cardiovascular Effects of Environmental Noise Exposure*, which considers the health effects of disrupted sleep from traffic noise, and asserts operation of the existing BCHD campus currently and implementation of the proposed Project would disrupt sleep and cause adverse health effects related to excess noise such as traffic and siren noise. However, described under Impact NOI-3, the operations at the BCHD campus would comply with the City of Redondo Beach noise ordinance, including all maximum permissible sound level requirements by land use type. Siren noise associated with the proposed Project would also be limited in frequency, with an estimated increase from 98 calls per year to 244 calls per year, an increase of approximately 12 calls per month. An increase in the exposure to siren noise of this magnitude would clearly not exceed any of the operational noise thresholds identified in the EIR, which are based on the requirements of the Redondo Beach Municipal Code (RBMC) and Torrance Municipal Code (TMC). Nor is there substantial evidence to support the assertion that this magnitude and frequency of noise exposure substantially contribute to increases in noise pollution that could measurably result in health concerns. With regard to transportation-related noise, the quantitative noise analysis provided in Section 3.11, *Noise* demonstrates that the proposed Project would result in an increase in roadway noise of less than 1 dBA, which would not be perceptible to the human ear, and thus, would be less than significant.

Letter MN119

June 10, 2021
Mark Nelson

Comment MN119-1

The comment provides a link to a video file. In the video excerpt, Dan Witters of Gallup National Health and Well-Being Index states that the purpose of the administered Well-Being Index survey is to demonstrate that engagement with Bluezone services provides a positive impact on wellbeing of participants. Witters clarifies that the purpose of the survey is not to quantify impacts of individual programs provided through Bluezone. The comment then states that project objectives are invalid because Beach Cities Health District (BCHD) does not provide statistical analysis of programs. Per California Environmental Quality Act (CEQA) Guidelines Section 15124(b), the purpose of project objectives are to help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision makers in preparing findings or a statement of overriding considerations. This EIR includes Project Objective 2: “Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services” and Project Objective 6: “Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs”. In part, these objectives describe an underlying purpose of the proposed Project. Analysis of quantified impacts of BCHD provided programs is not a prerequisite to the development of project objectives. Refer to Master Response 4 – Project Objectives.

Letter MN120

June 10, 2021
Mark Nelson

Comment MN120-1

The comment states that the Environmental Impact Report (EIR) is deficient because it does not reference the Healthy Living Campus Master Plan. As stated in the opening sentence of Section 1.0, *Introduction*, “[t]his Environmental Impact Report (EIR) evaluates the potential physical environmental impacts of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project).” The “*proposed Project*” referenced throughout the EIR is an abbreviation for the Beach Cities Health District Healthy Living Campus Master Plan.

Letter MN121

June 10, 2021
Mark Nelson

Comment MN121-1

The comment asserts that the primary motivation for the proposed Project is financial and expresses doubt regarding the need for assisted living units or senior care in the area. The comment states there is not substantial evidence regarding whether the Beach Cities Advanced Imaging Building (510 North Prospect Avenue) and the Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) could create a financial benefit through leasing. The comment asserts the Cities Health Center (514 North Prospect Avenue), is not obligated to seismic retrofit or demolition. The comment states their opinion that the No Project Alternative would have a lesser environmental impact than the proposed Project. The comment then suggests the 510 and 520 North Prospect buildings be leased for revenue.

Refer to Master Response 3 – Project Need and Benefit for detailed discussion and response to comments pertaining to seismic safety. Refer to Master Response 4 – Project Objectives for detailed discussion and a response to comments pertaining to BCHD’s intent for implementing the proposed Project.

As described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these three buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD programs.

Letter MN122

June 10, 2021
Mark Nelson

Comment MN122-1

The comment contests the finding that the proposed Project would not result in significant impacts to aesthetic and visual resources, specifically impacts regarding skyline views and shade and shadow effects. The comment letter includes Google Earth Pro images intended to represent surrounding areas from which the proposed development would be visible. It should be noted that the EIR’s actual finding was that impacts to scenic vistas (i.e., public views of Palos Verdes ridgeline) would be less than significant with mitigation. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to potential impacts aesthetic and visual resources, including sky views and shade and shadow effects.

Letter MN123

June 10, 2021
Mark Nelson

Comment MN123-1

The comment states the Environmental Impact Report (EIR) analyzes too few representative views and therefore analysis is insufficient and provides Google Earth images of the Project site with a homemade model of the proposed Project from various vantage points. The comment asserts impacts to the surrounding neighborhood character would be adverse and significant. Refer to the response to Comment MN101-1 regarding sufficiency of representative views. Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue.

Letter MN124

June 10, 2021
Mark Nelson

Comment MN124-1

The comment claims the EIR is insufficient and defective. The comment provides visual images of a homemade Google Earth Pro model of the proposed Project from various vantage points and notes where the model allegedly interrupts skyline views. The images appear to be similar to those provided in the video link included in Comment MN26-1. The comment claims the images demonstrate the proposed Project would have significant impacts to visual character of the surrounding area. Refer to the response to Comment MN101-1 regarding sufficiency of representative views provided in the EIR. Refer also to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue.

The attached visuals also claim the proposed Project would create significant shade and shadow impacts. The EIR includes analysis on proposed Project impacts on the existing visual character and quality of public views of the Project site and its surroundings. The EIR also includes analysis of proposed Project shading effects on nearby shadow-sensitive land uses based off criteria set forth in the *City of Los Angeles CEQA Thresholds Guide (2006)*, which state a project would normally be considered to have a significant shade and shadow impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late

October). Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues.

Letter MN125

June 10, 2021
Mark Nelson

Comment MN125-1

The comment states the proposed Project increased the height and the square footage of the proposed Project despite public comment and therefore, is inaccurately claims to have revised project design based on public input. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a summary of the previous revisions to the proposed Healthy Living Campus Master Plan.

Letter MN126

June 10, 2021
Mark Nelson

Comment MN126-1

The comment requests an inventory of received public comments be provided. As described in the response to Comment MN106-3, all public comments were posted after the close of the public comment period. Consistent with CEQA Guidelines Section 15088 of the State, all of the comments received on the Draft EIR, including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on March 24, 2021, April 13, 2021, and April 17, 2021, were reviewed and responded to, as appropriate.

Letter MN127

Comment MN127-1

The comment asserts that the Beach Cities Health District (BCHD) has predetermined the outcome of the proposed Project by only considering options for development of a Residential Care for the Elderly Building (RCFE). It should be noted that alternative uses were addressed in Section 5.0, *Alternatives* (i.e., hospital and medical office building) but were ultimately discarded because they did not meet the project objectives or because they would result in more severe environmental impacts (e.g., additional trips associated with medical office buildings).

Letter MR

March 24, 2021
Mark Razavi

Comment MR-1

The comment expresses general opposition to the scale of the proposed Project, any substantial evidence. The comment also expresses general concerns, again without substantial evidence or expert opinion, regarding potential adverse effects of demolition and construction in proximity to residences and schools. These issues are addressed in Section 3.1, *Aesthetics and Visual Resources* and throughout the construction impact analysis provided in the Environmental Impact Report (EIR), including Section 3.2, *Air Quality*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MLE

June 8, 2021
Mary L. Eninger
5609 Andrus Avenue
Torrance, CA 90503

Comment MLE-1

The comment expresses opposition for the proposed Project, citing impacts to traffic, noise, and air quality, and tree removal as reasons for opposition. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation impacts. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comment pertaining to construction-related and operational noise impacts associated with the proposed Project. Refer to Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to air pollutant emissions. The EIR includes adequate discussion of the potential biological impacts and mitigation proposed Project, including compliance with to policies relating to tree preservation. While the proposed Project would require removal of mature trees, all necessary permits would be obtained prior to tree removal. Further, the proposed landscaping plan would include large, landscaped trees to replace

removed vegetation. The landscaping plan would meet landscaping regulations provided in the Redondo Beach Municipal Code (RBMC) and be consistent the Torrance Street Tree Master Plan. Therefore, impacts would be less than significant.

Letter ME

June 10, 2021
Mary R.Ewell, M.F.T.
Redondo Beach, District 2

Comment ME-1

The comment expresses a historic opposition to the proposed Project and asserts, without substantial evidence, that students would be negatively impacted by air pollution. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to concerns regarding construction impacts on air quality, particularly on nearby sensitive receptors including schools and single-family residences. As described therein, impacts to sensitive receptors would be less than significant with the implementation of Mitigation Measure (MM) AQ-1. This analysis is supported by exhaustive quantitative modeling prepared by prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. The comment does not challenge the thresholds, methodologies, or findings of this analysis.

Comment ME-2

The comment challenges the need for the proposed Assisted Living program and Memory Care facility. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need for proposed Project.

Comment ME-3

The comment claims the costs of residence in the proposed Assisted Living program and Memory Care community would be unaffordable for median income Beach Cities residents and would contribute to the wealth divide. The comment also states the implementation of the proposed Assisted Living program and Memory Care community would defy the California governor’s mandate for implementing 2,500 affordable housing units in Redondo Beach and suggests the proposed Project is exclusively motivated by profit. For further discussion on the affordability of the proposed senior housing, refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for detailed discussion and response to comments regarding

underlying purpose for the proposed Project. Regarding affordable housing concerns, it should be noted that 10-percent of the proposed units are being considered at below-market rates; therefore, contrary to this comment, implementation of the proposed Assisted Living units may help the City of Redondo Beach meet Regional Housing Needs Allocation (RHNA) for affordable housing.

Comment ME-4

The comment states implementation of the proposed Project would be inconsistent with the P-CF (Community Facility) zoning and suggests BCHD instead augment funds towards community services including services that would provide senior care at home. As described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue the existing model to reinvest revenue into community services such as senior care and health programs. As described in Section 3.10.2, Regulatory Setting, under Redondo Beach Municipal Code (RBMC) Section 10- 2.1110, residential care facilities are clearly allowed in areas zoned as P-CF with a conditional use permit (CUP). It should also be noted that the proposed Project would include establishment of Programs of All-Inclusive Care for the Elderly (PACE), a Medicare and Medicaid program that would help people meet their health care needs while remaining in their home/community instead of moving into a nursing home or other care facility.

Comment ME-5 through Comment ME-14

The individual comments provided in this letter are substantially similar to and responded to in Letter AW.

Letter MG3

April 18, 2021
Mary Gaye

Comment MG3-1

The comment states the proposed Project and related air quality, noise, and traffic impacts during the duration of the construction period is not wanted by the community. These construction-related impacts are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantitative modeling prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or findings of these analyses. Nevertheless, this comment has been received,

incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

The comment also asserts, without substantial evidence or expert opinion, that the Assisted Living program is not needed. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the need and benefits of the proposed Project.

Letter MG4

June 9, 2021
Mary Gaye

Comment MG4-1

The comment states that the residents of Redondo Beach and Torrance have vocalized opposition to the proposed Project. The comment asserts the proposed Project be stopped, citing there is not a need for an expensive assisted living facility. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to these issues. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MW1

May 1, 2021
Mary Watkins
401 N. Lucia Ave.
Redondo Beach CA 90277

Comment MW1-1

The comment expresses opposition to the proposed redevelopment at the Beach Cities Health District (BCHD) campus. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment MW1-2

The comment states that the parcel is designated as public land and no additional commercial enterprises should be allowed there. Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue.

Comment MW1-3

The comment states, without substantial evidence or expert opinion, that construction of the proposed Project would create traffic impacts which would in turn generate additional air pollution and noise impacts in proximity to residential neighborhoods and schools. These construction-related impacts are addressed in detail in Section 3.14, *Transportation* as well as Section 3.2, *Air Quality*, and Section 3.11, *Noise*. This analysis is supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

Comment MW1-4

The comment states that because the proposed Project would involve a change in land use and because of the magnitude of construction required under the proposed Project, the proposed Project should require the approval of a majority of Beach Cities voters. Contrary to the commenter's assertion, the proposed Project would not require a change in land use. Refer to the response to Comment TRAO-4 as well as Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation for a detailed discussion and response to comments pertaining to this issue. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MLW

June 8, 2021
Mike & Laura Woolsey
Tomlee Avenue Residents

Comment MLW-1

The comment expresses general opposition for the proposed Project and requests that it be stopped. The comment states that the proposed Project is too large for the neighborhood and would create negative effects to the community. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MJ

March 23, 2021
Mike Jamgochian
Redondo Beach

Comment MJ-1

The comment expresses general concerns regarding the duration of construction-related noise impacts. As described in Section 3.11, *Noise* under Impact NOI-1, construction noise levels would result in significant and unavoidable noise impacts to sensitive receptors. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction-related noise impacts.

Comment MJ-2

The comment expresses general concerns, without substantial evidence, that the height and scale of the proposed Project would be inconsistent with the surrounding neighborhood character and create a negative impact on aesthetics and visual resources. The comment asserts that these impacts would be exacerbated by the proposed location of the Residential Care for the Elderly (RCFE) Building on northeast corner of the Project site. The comment also states, without substantial evidence, photographs, or other details, that the proposed RCFE Building would be visible from over a mile from the Project site and suggests the Redondo Beach Planning Commission should impose building height and size restrictions. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to building height and visual character. As described therein, development of the proposed RCFE Building would

substantially alter existing views of and across the Project site from representative views surrounding the site. However, the implementation of the RCFE Building would comply with applicable zoning and regulations governing scenic quality and would not substantially degrade the visual character or visual quality of the site from the public realm.

Master Response 9 – Aesthetics and Visual Resources Analysis also provides a detailed summary of the revisions to the proposed Healthy Living Campus Master Plan intended to reduce the building frontage along the eastern boundary of the campus. In response to the community’s concerns described above, BCHD revised the footprint of the RCFE Building was further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east.

Comment MJ-3

The comment states that public-private joint venture would create a conflict of interest resulting in a profit-motivated project. The comment suggests that there are financial alternatives to the proposed Project including reducing BCHD operating expenses, selling parts of the property, or proposing a bond. First, as described in Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community and therefore would remain compatible with land use designation. It should also be noted that the No Project Alternative and Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus explore each of the alternatives suggested in this comment.

Comment MJ-4

The comment expresses a preference for the No Project Alternative over the proposed Project. The comment also supports the dissolution of BCHD and the disbursement of BCHD assets between the Beach Cities. Although these comment does not address the adequacy of the EIR, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be

advanced to decision makers for further consideration during deliberations on the proposed Project.

Letter MP

April 5, 2021
Mike Patel
South Redondo Beach Resident

Comment MP-1

The comment expresses support for the proposed Project under the condition that the proposed Project size is reduced by 30 percent. Although these comments do not address the adequacy of the Environmental Impact Report (EIR), they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Comment MP-2

The comment asserts, without substantial evidence or expert opinion, that the proposed Project would have a tremendous impact on noise and traffic. The comment further states that the residents and the three schools in the area would be impacted. Construction-related impacts to noise and traffic are discussed in detail in Section 3.11, *Noise* and Section 3.14, *Transportation*. These impact analyses are supported by technical studies and exhaustive quantitative modeling efforts prepared by experts in their field. The comment does not challenge any of the thresholds, methodologies, or conclusions of these technical studies. Refer to Master Response 12 – Noise Analysis and Master Response 13 – Transportation Analysis for a detailed discussion and response to comments regarding these issues.

It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. It should also be noted that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17).

Again, although these comment do not address the adequacy of the Environmental Impact Report (EIR), the support for a reduction in the size of the proposed Project by 30 percent will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Letter MW2

May 26, 2021
Mike Woosley

Comment MW2-1

The comment expresses general opposition to the proposed Project, stating it is not in the best interest of the community. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan..

Letter MW3

June 3, 2021
Mike Woosley

Comment MW3-1

The comment expresses opposition to the proposed Project, stating that the proposed Project would not fit with the scale of the surrounding neighborhood and block skyline views. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter MT1

May 11, 2021
Mirna Trujillo

Comment MT1-1

The comment expresses opposition to the proposed Project due to concerns that Project implementation would distract students the nearby Towers Elementary School and create traffic and dust impacts. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to comments pertaining to air quality. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation. It should also be noted that the Beach Cities Health District (BCHD) has revised the proposed haul routes (refer to the response to Comment KB-3), which Torrance Unified School District (TUSD) has acknowledged would reduce potential impacts at Towers Elementary School.

Letter MT2

May 11, 2021
Mirna Trujillo

Comment MT2-1

The comment demands the proposed Project be stopped. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter NO

April 4, 2021
Naomi Onizuka
Redondo Beach Resident

Comment NO-1

The comment expresses general opposition to the proposed Project and denies the need for the proposed Assisted Living units. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For issues related to the purpose and need for the proposed Project refer to Master Response 3 – Project Need and Benefit. Accounting for existing and planned senior housing communities in the vicinity of the Project site, the 2019 Market Feasibility Study prepared by MDS Research Company, Inc. concludes that the proposed senior Assisted Living and Memory Care units are needed and would be filled following the completion of the proposed Residential Care for the Elderly (RCFE) Building described for the Phase 1 preliminary site development plan.

The comment also contends the proposed Project would bring unwanted noise and construction; however, the comment does not challenge any of the comprehensive and detailed analysis of construction-related impacts provided in the EIR, including the significant and unavoidable impacts identified for noise under Impact NOI-1. Further detail on the EIR's noise analysis is provided in Master Response 12 – Noise Analysis.

Letter PA

June 10, 2021
Pam Absher

Comment PA-1

The comment expresses general opposition to the proposed Project, contesting project benefit and generally citing size, traffic, and costs to tax payers as reasons for opposition. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project.

The commenter states that none of my friends or family use the facility as evidence to suggest that there is no need for the proposed Project. However, there is a clear service population within the Beach Cities and the South Bay. Based on sign in records that were incorporated into the comprehensive trip generation analysis, hundreds of people per day use the Center for Health and Fitness (CHF) alone. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a discussion of the demonstrated need and anticipated benefit of development of the proposed Project, each of which are also discussed at length in Section 2.0, *Project Description*.

Finally, the comment asserts that the EIR is defective but fails to provide substantiating evidence or other identify specific issues with the EIR or impact analysis, mitigation measures, and alternatives that may not have been sufficiently assessed.

Letter PB

June 5, 2021
Patricia L. Brown

Comment PB-1

The comment expresses general opposition to the proposed Project, stating the proposed Assisted Living units would be unaffordable. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to

the affordability of the proposed senior housing. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment PB-2

The comment expresses concern regarding construction-related impacts air quality and pollution, noise, and traffic. These issues are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

It should also be clarified that while Phase 1 and Phase 2 would combine for a total construction period of 5 years; however, the comment fails to acknowledge that the implementation of Phase 1 would occur over a period 29 months followed by a substantial gap prior to the implementation of Phase 2 over a period of 28 months.

Comment PB-3

The comment expresses general concerns, without substantial evidence or expert opinion, that implementation of the proposed Project would expose sensitive receptors including children and students at Towers Elementary School to harmful emissions. Refer to Master Response 10 – Air Quality Analysis for detailed discussion and response to concerns regarding construction impacts on air quality, particularly on nearby sensitive receptors including schools and single-family residences. As described therein, impacts to sensitive receptors would be less than significant with the implementation of Mitigation Measure (MM) AQ-1. This analysis is supported by exhaustive quantitative modeling prepared by prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. The comment does not challenge the thresholds, methodologies, or findings of this analysis.

Comment PB-4

The comment suggests the primary purpose of the proposed Project is to generate revenue. The comment also suggests the existing Silverado Beach Cities Memory Care Community is sufficient to continue meeting the community's need for assisted living facilities and reiterates opposition. Refer to Master Response 3 – Project Need as well as Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments regarding the underlying purpose of the proposed Project.

Letter PW

Comment PW-1

The comment expresses concern that the proposed Project would fail financially. The comment expresses doubt that the proposed Project would benefit the community beyond private investors. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and a response to comments pertaining to these issues. Refer to Master Response 3 – Project Need as well as Benefit and Master Response 4 – Project Objectives for a detailed discussion and response to comments regarding the underlying purpose of the proposed Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter PS

June 10, 2021
Paul Schlichting
South Broadway
Redondo Beach, CA

Comment PS-1

The comment expresses opposition to the proposed *Project*, asserting that Assisted Living program would be bad for the community. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments pertaining to the underlying purpose of the proposed Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will

be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment PS-2

The comment asserts, without substantial evidence, that the size of the proposed Project would not fit with the surrounding neighborhood. The comment also suggests the existing facilities are adequate to meet current needs. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis a detailed discussion and response to comments pertaining to building height and visual character. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and a response to comments pertaining to the regarding the need for the Project pertaining to the underlying purpose of the proposed Project. As described therein, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings.

Comment PS-3

The comment compares the proposed Project with the recent Kensington Assisted Living Facility. These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The comment does not relate to the suggested focus of the review in California Environmental Quality Act (CEQA) Guidelines Section 15204, which states, that “[i]n reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.”

Comment PS-4

The comment expresses concern regarding potential impacts to traffic and public utilities, including sewer, water, and energy facilities. The EIR includes adequate analysis of potential adverse physical effects the proposed Project may have on the community, including Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*. The EIR also analyzes for effects on community services and population and housing, including Section 3.5, *Energy*; Section 3.12, *Population and Housing*; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*.

Comment PS-5

The comment asserts, with no substantiating evidence or clarifying details, that the EIR has many flaws in its reporting and that many have expressed great concern regarding its contents. However, the comment does not identify specific issues, impacts, or mitigations that may not have been sufficiently assessed.

Comment PS-6

The comment states community objections should be addressed before the proposed Project is accepted. The comment suggests the Redondo Beach's Community Development Department has not historically considered community objections when considering the approval of projects. In accordance with Section 15088 of the CEQA Guidelines, BCHD, as the lead agency, has reviewed all of the comments received on the Draft EIR for the proposed Project, including written comments as well as oral comments that were provided by members of the public during the Draft EIR public hearings on March 24, 2021, April 13, 2021, and April 17, 2021. All of these comments are included in the Final EIR and are provided written responses. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment PS-7

The comment suggests the primary motivation of the proposed Project is to generate revenue and again suggests the adverse effects and benefits of the proposed Project have not sufficiently been assessed. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for detailed discussion and response to comments pertaining to these issues. It should be noted that BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

The comment also restates concerns that the proposed Assisted Living program would not be affordable to local residents. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments regarding affordability of Assisted Living program and Memory Care community. As described therein, the market

studies prepared by MDS Research Company, Inc. identify that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards, and if the conclusions and demand estimates were reasonable. Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology and reasonable assumptions, and that the conclusions are supported by the analysis, research, and data presented in the study. Cain Brothers also compared the pricing levels in the MDS market study with the actual monthly fees at the existing Silverado Memory Care Facility on the BCHD campus and the Sunrise Assisted Living Facility in Hermosa Beach and verified the reasonableness of the proposed pricing level.

Comment PS-8

The comment expresses concern, without substantial evidence or expert opinion, that the level of disturbance over the construction period is incalculable and potentially underestimated. However, this comment fails to acknowledge the technical studies and exhaustive quantitative modeling efforts prepared by experts in their fields. The comment does not challenge any of the thresholds, methodologies, or conclusions of these technical studies.

Comment PS-9

The comment suggests the proposed Project gain community acceptance before proceeding. Although these comments do not address the adequacy of the EIR, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Letter PBK1

March 24, 2021
Phil & Barbara Kiyokane

Comment PBK1-1

The comment expresses general opposition to the proposed Project, citing incompatibility with the existing neighborhood character. Refer Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated

into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment PBK1-2

The comment states, without substantial evidence or expert opinion, that the proposed Project would increase traffic. Transportation impacts have been addressed in detail in Section 3.14, *Transportation*. This analysis is supported by various transportation studies prepared by Fehr & Peers, a preeminent traffic engineering firm that has prepared numerous complex transportation studies within Redondo Beach and the South Bay. The comment does not challenge the thresholds, methodologies, or findings of this analysis. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation issues.

Letter PBK2

June 3, 2021
Phil & Barbara Kiyokane

Comment PBK2-1

The comment expresses general opposition to the proposed Project due to perceived concerns regarding impacts to the neighborhood character, traffic, and privacy issues. Refer to BCHD Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height, visual character, and privacy. Refer to Master Response 13 – Transportation Analysis for a detailed discussion and response to comments pertaining to transportation issues. The comment provides no substantial evidence and does not challenge the thresholds, methodologies, or findings of the technical studies and exhaustive quantitative modeling supporting the analysis of these issues. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment PBK2-2

The comments offers a summary of the existing transportation network along Flagler Lane and Beryl Street, noting queuing and back-ups related to Towers Elementary School. The comment incorrectly identifies an addition of over 400 residences under the proposed Project and expresses concern that the increase in residences and employment would worsen traffic conditions. As

discussed in detail in Section 3.14.2, *Regulatory Setting*, it should be noted that changes in State law now require that California Environmental Quality Act (CEQA) analysis be based on vehicle miles traveled (VMT) by measuring the number and distance of daily vehicle trips, rather than the previous practice of analyzing level of service (LOS) by measuring intersection congestion and roadway capacity.

Nevertheless, at the request of the City of Redondo Beach and the City of Torrance, Fehr & Peers also prepared a Non-CEQA Intersection Operational Evaluation (see Appendix J) to help the cities and interested residents understand this issue, which contains a detailed assessment of traffic circulation issues, with particular focus on the potential for increases in congestion (i.e., changes in LOS) at intersections along avenues, boulevards, and commercial streets in the City of Redondo Beach and City of Torrance. While this analysis is not discussed further in the EIR, it generally found that due to a minor reduction in peak hour trips, the proposed Project – including the Phase 1 site development plan and the Phase 2 development program – would result in a minor beneficial effect on intersection congestion and roadway capacity within the immediate vicinity of the Project site.

Comment PBK2-3

The comment expresses general concern, without substantiating evidence or expert opinion that construction-related air quality, noise, and impacts could cause adverse health effects to nearby residences and school students. The EIR includes adequate analysis under CEQA for the impacts that physical changes of the Project may have on a community, including Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. Refer to Master Response 10 – Air Quality, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for a detailed response to comments pertaining to these issues. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. However, construction schedule would be consistent with Redondo Beach Municipal Code (RBMC) Section 4-24.503 and Torrance Municipal Code (TMC) Section 6-46.3.1. The comment provides no substantial evidence that provides a clear connection between the construction noise levels quantified in the EIR (refer to Table 3.11-16 and Table 3.11-17) and stress or lack of sleep.

Comment PBK2-4

The comment suggests the proposed Project be relocated to a location more accessible from major thoroughfares. As described in Section 5.4, *Alternatives Considered but Rejected from Further*

Analysis, such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. As described in CEQA Guidelines Section 15126.6(f)(3), “[a]n EIR need not consider an alternative...whose implementation is remote and speculative.”

Letter PDW-1

June 4, 2021
Philip de Wolff
1408 Diamond Street
Redondo Beach, CA 90277

Comment PDW-1

The comment states residences along Diamond Street were not identified in the initial Healthy Living Campus Master Plan and suggests that the concerns for the surrounding neighborhoods voiced by the Beach Cities Health District (BCHD) Board of Directors was disingenuous. These comments do not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. The environmental impact analysis – including the quantitative analysis of air quality and noise – clearly identify the surrounding sensitive receptors (e.g., adjacent residences) and address potential impacts. Refer to the response to Comment PDW1-4 for additional detailed discussions. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment PDW-2

The comment notes the proposed Project would involve construction of the Residential Care for the Elderly (RCFE) Building, which the comment asserts, without substantial evidence or expert opinion, would create shading effects, alter green zones, and noise and air quality impacts. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to the shade and shadow analysis provided in the EIR. It should be noted that the comment does not challenge the thresholds, methodologies, or findings of the shade and shadow modeling, which was prepared by a licensed architect. Open space under current conditions at the Project site is generally limited to landscaping bordering buildings and the hillside along the eastern edge of the campus. However, under the proposed Project, open space would be expanded to include approximately 2.45 acres of programmable open space within the interior of the Project site. Further, the landscaping plan under the proposed Project would include perimeter landscaping along the western and eastern border (Flagler Alley, Flagler Lane, Diamond Street) of the BCHD campus, which would include with intermittent large shade canopy trees and smaller shade trees. Therefore, greenspace and perimeter landscaping would be maintained and enhanced under the proposed Project. Further discussion on construction and operational noise impacts resulting from the proposed Project is provided in Master Response 12 – Noise Analysis. Further discussion regarding construction impacts on air quality, particularly on nearby sensitive receptors including schools and single-family residences is provided in Master Response 10 – Air Quality Analysis.

Comment PDW1-3

The comment expresses general concern regarding potential adverse health effects from the proposed substation. The comment states, without substantial evidence or expert opinion, that high voltage causes cancer, but provides no clear connection between the 16 kilovolt (kV) or 4.16 kV lines along North Prospect Avenue that would be brought to the proposed Southern California Edison (SCE) Substation Yard. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

Comment PDW1-4

The comment claims that the EIR fails to identify the nearby Diamond Street residences and asserts that the EIR omits discussion of impacts that would be experienced by these residences under the proposed Project. However, contrary to this comment, the EIR clearly acknowledges and depicts the single- and multiple-family residences border the BCHD campus to the south, east, and west. In response to concerns that the Diamond Street residences are not addressed in the EIR, Section

2.2.2, *Surrounding Land Uses*, of the Final EIR has been revised to specifically “*Single-family residences zoned R-1 by the City of Redondo Beach face the Project site from the southeast along Diamond Street.*” However, it remains that the residences nearest to the Project site are located approximately 80 feet from the developed edge of the BCHD campus. The EIR conservatively considers this proximity and resulting impacts whenever relevant in resource area analysis (e.g., air quality, noise, etc.). Therefore, the EIR and impact analysis remain adequate and technically sufficient.

Comment PDW1-5

The comment incorrectly asserts the EIR does not account for existing hazardous material on the Project site, soil contamination from the former dry cleaners, or acknowledge runoff or construction-related fugitive dust emissions. As described in Section 3.8, *Hazards and Hazardous Materials* the Phase I Environmental Site Assessment (ESA) identified potential sources of contamination including the former dry cleaner located within the Redondo Village Shopping Center. The subsequent Phase II ESA included the collection of soil borings to test for soil contaminants and soil vapor present on the Project site. Based on the findings of the Phase I and Phase II ESAs, the EIR describes compliance with applicable regulations and standards, best management practices, and required mitigation measures to address these conditions during construction. The potential for stormwater runoff is discussed in detail Section 3.9, *Hydrology and Water Quality*. As described in Section 3.2, *Air Quality* the analysis of construction of the proposed Project considers the impacts of PM₁₀ and PM_{2.5} (fugitive dust) emissions. Refer to Master Response 11 – Hazards and Hazardous Materials as well as Master Response 10 – Air Quality Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment PDW1-6

The comment predicts, without provided substantiating evidence, that the implementation of the proposed Project would create light pollution. The EIR includes detailed consideration and analysis of impacts with nighttime lighting and glare issues in Section 3.1, *Aesthetics and Visual Resources*. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment PDW1-7

The comment states that the sidewalk along the Diamond Street cul de sac adjacent to BCHD should not be included as BCHD property. As described in Section 2.2.1, *Project Location*, the Project sites contain two legal parcels: Assessor’s Identification Number [AIN] 7502-017-903 and

AIN 7502-017-902. The proposed Project would not expand beyond these properties or outside existing boundaries.

Letter RPQ

June 8, 2021
Randy & Pamela Quan
Torrance

Comment RPQ-1

The comment expresses general opposition to the proposed Project, citing that the proposed development would be too large for the surrounding neighborhood. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. For issues related to building height and visual character, refer to Master Response 9 – Aesthetics and Visual Resources Analysis.

Letter RF

March 24, 2021
Reid Fujinaga

Comment RF-1

The comment expresses general opposition to the proposed due to concerns regarding hazardous material and air pollutant exposure to school children at Towers Elementary School and claims that the Beach Cities Health District (BCHD) should focus on health rather than real estate development. The Environmental Impact Report (EIR) thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). Exposure to tetrachloroethylene (PCE) in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). Therefore, as discussed further in Section 3.8, *Hazards and Hazardous Materials*, this disturbance of existing soils during construction activities on the BCHD campus has no potential to affect school children at Towers Elementary School. Additionally, the air quality analysis provided in the EIR is supported by a Health Risk Assessment (HRA), which determined that with the implementation of the mitigation measures identified in the EIR (i.e., MM AQ-1, which includes a requirement for U.S. Environmental Protection Agency [USEPA] Tier 4 engines), cancer risk and non-cancer health effects would remain below the thresholds established by the South Coast Air Quality Management District (SCAQMD) (refer to Section 3.2, *Air Quality*

and Appendix B). Refer to Master Response 10 – Air Quality Analysis and Master Response 11 – Hazards and Hazardous Materials for further discussion and response to these issues.

Letter RL

April 13, 2021
Robert Levy
19314 Tomlee Avenue
Torrance, ca 90503

Comment RL-1

The comment states the proposed Project should be rejected due to its size, height, impacts, to noise, and cost. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to concerns regarding building height and visual character. Refer to Master Response 12 –Noise Analysis for a detailed discussion and response to comments pertaining to construction and operational noise associated with the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to concerns regarding financial feasibility of the proposed Project. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter RTGGI

April 6, 2021

Rosann Taylor
1408 Diamond St.
Redondo Beach, CA 90277

Geoff Gilbert
1406 Diamond St.
Redondo Beach, CA 90277

Comment RTGGI-1

The comment request all documentation associated with the proposed electrical substation and analysis of cancer-causing effects of electromagnetic fields (EMFs) associated with the substation. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard a detailed discussion and response to comments pertaining to these issues. It should be noted

that the comment does not provide any substantial evidence or expert opinion regarding the assertions that the proposed electrical substation would result in cancer-causing effects. Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15204(b), “*if persons...believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant.*”

Nationally and internationally recognized scientific organizations and independent regulatory advisory groups have been organized to conduct scientific reviews of the EMF research and peer reviewed publications. Their ability to assemble experts from a variety of disciplines to review the full body of research on this complex issue gives their reports credibility. Without exception, these major reviews have reported that the body of data, as large as it is, does not demonstrate that exposure to power-frequency magnetic fields causes cancer or poses other health risks, although the possibility cannot be dismissed. Because of the uncertainty, most reviews recommend further research, and, appropriately, research is ongoing worldwide. The weakness of the reported epidemiological associations, the lack of consistency among studies, and the severe limitations in exposure assessment in the epidemiological studies, together with the lack of support from laboratory research, were key considerations in the findings of the scientific reviews. Additional information is provided in *Understanding electric and magnetic fields*, which can be found here: https://www.sdge.com/sites/default/files/final_emf_s1510006_eng.pdf.

Pursuant to CEQA Guidelines Section 15151, “[*d*]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.”

Letter RTGG2

April 6, 2021
Rosann Taylor
Geoff Gilbert

Comment RTGG2-1

The comment restates the request for information concerning the 4 kilovolt (kV) electrical substation. Refer to the response to Comment RTGG1-1.

Letter RT

June 10, 2021
Rosann Taylor

Comment RT-1

The comment requests the EIR include an analysis of cancer-causing effects of electric magnetic fields. The comment requests the electrical yard be relocated. Refer to the response to Comment RTGG1 as well as Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for a detailed discussion and response to comments pertaining to this issue.

Letter RV

April 13, 2021
Rose Valeriano
Beryl Heights Resident

Comment RV-1

The comment expresses general opposition to the proposed Project and states a desire to protect against perceived noise, pollution, and traffic. Refer to Master Response 10 – Air Quality Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis for detailed discussion and response to commenters pertaining to these issues. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment RV-2

The comment expresses a general desire to maintain existing character. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to visual character.

Letter SY

June 10, 2021
Susan Yano
Torrance

Comment SY-1

The comment requests a glossary for words and phrases used in the Environmental Impact Report (EIR). Consistent with the requirements of the California Environmental Quality Act (CEQA) Guidelines Section 15123 the Executive Summary of the EIR provides a brief summary of the proposed actions and its consequence with language “...as clear and as simple as reasonably

practicable.” In addition, the EIR provides a simplified Reader’s Guide to further assist reviewers in understanding the EIR. A glossary is not necessary or required by the CEQA Guidelines.

Comment SY-2

The comment questions the need for the Residential Care for the Elderly (RCFE) Building and requests a list of Beach Cities Health District (BCHD) programs and services as well as the cost of these services. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to these issues.

It should be noted that, for decades, BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. For a complete list of school and youth programs, health programs, healthy living programs and other resources provided by BCHD, see the BCHD website here: <https://www.bchd.org/>.

Comment SY-3

The comment implies that the EIR cannot evaluate the construction or operation of the development under Phase 2, without additional detail about the development program. Due to uncertainties in future health and wellness programming, trade-offs associated with site planning and design, and financing considerations, Phase 2 can only be programmatically described at this time. It is anticipated that final selection of a detailed site development plan for Phase 2 would be based on the considerations discussed in Section 2.5.2.2, *Physical Design Considerations and Priority-based Budgeting*, but would not occur until after the completion of Phase 1.

This is clearly in keeping with the requirements of CEQA Guidelines Section 15165, which states:

“Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking

or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect.”

As a result, the Phase 2 development program is evaluated programmatically in that construction impacts have been evaluated using maximum durations of construction, maximum areas of disturbance, and maximum building heights based on the design guidelines of the proposed Healthy Living Campus Master Plan.

As described further in Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*...narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

Comment SY-4

The comment expresses general concerns regarding the financing associated with Phase 1 and Phase 2 of the proposed Project. Refer to Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to this issue. As described therein, BCHD has very clearly and consistently demonstrated that the funding necessary to implement the proposed Phase 1 preliminary site development plan, which is anticipated to cost \$235 million, is secured. These funds consist of revenue generated by property assessments, BCHD’s health and fitness facilities, and tenant space within the Beach Cities Health Center, as well as leases, partnerships, grants. While funds for implementation of the Phase 2 development program may not yet be fully secured, implementation of the Phase 1 preliminary site development plan would help provide funding for the Phase 2 development program. For instance, as proposed, the proposed Project would involve construction and operation of the RCFE Building prior to retrofit/renovation of Beach Cities Health Center. This would allow for the lease of space and acquisition of revenue from tenants and participates of the Assisted Living program and Memory Care community as well as the Program of All-Inclusive Care for the Elderly (PACE) within the

RCFE Building. In addition, BCHD would continue to be able to seek and secure appropriate funding through existing programs, property assessments, leases, partnerships, and grants to implement the Phase 2 development program.

Comment SY-5

The comment asserts that as a local Torrance street, BCHD should receive permission from the City of Torrance for the proposed site access along Flagler Lane, and asks whether a new EIR would be required for a new design precluding access from Flagler Lane. Table 3.10-6 in Section 3.10, Land Use and Planning acknowledges a potential conflict with TMC Section 92.30.8 given that the vacant Flagler Lot has a frontage with Beryl Street, but would exit onto Flagler Lane, that latter of which is designed as a local road by Policy 11 and 12 of the Torrance General Plan Circulation and Infrastructure Element. For this reason, the EIR evaluates Alternative 3 – Revised Access and Circulation, which would avoid this potential conflict altogether.

Comment SY-6

The comment claims that the proposed Project does not support the project pillars and project objectives. Additionally, the comment questions the affordability of the proposed Assisted Living units. Refer to Master Response 4 – Project Objectives and Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and responses pertaining to these issues. It should be noted that the market feasibility study prepared by MDS Research Company, Inc. found that approximately 70 percent of residents of the proposed senior housing units would come from the Primary Market Area within a 5-mile radius of the Project site. It should be noted that the proposed PACE services would permit seniors to safely remain in their own homes while receiving support to do so.

Comment SY-7

The comment lists a series of questions pertaining to the seismic safety of the existing Beach Cities Health Center. Refer to Master Response 3 – Project Need and Benefits as well as Master Response 4 – Project Objectives for a detailed discussion regarding the seismic safety of the Beach Cities Health Center and Beach Cities Advanced Imaging Center. It should be noted that BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract

from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Comment SY-8

The comment requests specific examples of mission-derived services and the amount of revenue needed to replace lost revenues from the vacation and demolition of the Beach Cities Health Center. Mission-derived services include services related to community health and wellness. For example, the existing Beach Cities Silverado Memory Care Community as well as the various outpatient medical office uses on the campus are mission-derived services that generate revenue for BCHD allowing for reinvestment a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. As described in Section 2.0, *Project Description*, the Beach Cities Health Center has been a significant source of revenue to BCHD through long-term leases to tenants who provide medical and health-related services that complement BCHD's mission.

It should be noted that CEQA states that an EIR should provide a description of the project, including a “...general description of the project's technical, economic, and environmental characteristics,” the lead agency is not required to “...supply extensive detail beyond that needed for evaluation and review of the environmental impact” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (*Sierra Club v. County of Napa* [2004] 121 Cal. App. 4th 1490, 1503).

Comment SY-9

The comment provides a series of questions regarding the proposed open space included in the proposed Project, such as the footprint of the open space during Phase 1 and Phase 2 of the Project, programs and allowable uses planned for this space, noise restrictions, events management, and security. As described in Section 2.5.1.1, *Proposed Uses* the proposed Project would substantially expand open space on the existing BCHD campus, including 114,830 square feet (sf) of programmable open space within the interior of the Project site. The development of the proposed Aquatics Center, CHF, and Wellness Pavilion in Phase 2 of the Project would not encroach on or otherwise limit the use of this open space. The central lawn would be sized to accommodate a variety of outdoor community events such as movie nights or group fitness activities. With regard to community events within the publicly accessible open space, all applicable permits would be

obtained from the City of Redondo Beach, as necessary. Additionally, consistent with Mitigation Measure (MM) NOI-3b an Events Management Plan would be prepared and implemented to ensure consistency with the Redondo Beach and Torrance noise ordinances.

The open space would not be privately owned or cordoned off for security purposes; however, as described in Section 2.0, *Project Description*, security features would be limited to access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas. The design of the proposed development would also minimize dead space to eliminate areas of concealment that might attract homeless persons or crime. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of Redondo Beach Municipal Code (RBMC) Section 10-5.1706(c)(10).

Comment SY-10

The comment challenges the need for the Assisted Living program. As described in Master Response 6 – Financial Feasibility/Assurance, BCHD retained MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, to conduct three market studies evaluating the feasibility of a proposed assisted living and memory care community in the City of Redondo Beach. Field work and analysis were originally completed in April 2016 and updated in August 2018 and May 2019 to reflect the changed number of proposed housing units. At the request of BCHD, Cain Brothers independently reviewed the MDS May 2019 updated market study to determine whether the methodology was consistent with other similar studies, if the assumptions reflected industry standards and if the conclusions and demand estimates were reasonable. The Cain Brothers review determined that the MDS Market Study utilizes industry standard methodology, reasonable assumptions and the conclusions are supported by the analysis, research and data presented in the study. The assertion that there is not a demand for Assisted Living in the Beach Cities is unfounded.

Additionally, the comment suggests that BCHD consider the implementation of a “Minnesota Approach”, where patients receive care services at home and in community-based settings such as adult care centers. It should be noted that the proposed Project would provide a PACE. As described in Section 2.5.1.1, *Proposed Uses*, PACE is a Medicare and Medicaid program that provides comprehensive medical and social services older adults (i.e., age 55 and older with an average age of 76). PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive,

primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation. For most participants, PACE services would enable them to remain in the community rather than receive care in a nursing home or other elder care facility.

Comment SY-11

The comment asserts that the Assisted Living units would not be available to the public, particularly the residents of the three Beach Cities, due to the price of the units. Refer to Master Response 4 – Project Objectives as well as Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and responses pertaining to these issues.

The comment also incorrectly states that the RCFE Building would accommodate 160 residents. It should be clarified, as described in Section 3.12, *Population and Housing*, the proposed Memory Care facility would include 60 double occupancy units that would continue to provide housing for up to 120 people and the proposed Assisted Living facility would support 157 new Assisted Living units that would provide for approximately 177 new residents on the BCHD campus.

Comment SY-12

This comment again questions the need for the Project and the future community health needs” as well as the financial details associated with the RCFE Building included as part of Phase 1 of the proposed Project. Refer to Master Response 3 – Project Need and Benefit, Master Response 4 – Project Objectives, and Master Response 6 – Financial Feasibility/Assurance for a detailed discussion and response to comments pertaining to these issues.

Comment SY-13

The comment provides a series of questions regarding the construction noise associated with the Project, particularly the construction schedule and impacts to the sensitive receptors, including residents and school students, in the Project vicinity. The construction hours and duration are detailed in Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*. As described therein, construction associated with Phase 1 would occur over approximately 29 months and construction associated with Phase 2, which would occur over approximately 28 months, would not begin until 2029, approximately 5 years after the completion of Phase 1. BCHD has proposed the following construction hours for the proposed Project, consistent with RBMC Section 4-24.503 and Torrance Municipal Code (TMC) Section 6-46.3.1:

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

Pursuant to the RBMC and TMC, construction outside of those hours is not allowed, unless permitted by the Building Officer in the case of an emergency or if the Building Officer should determine that the peace, comfort, and tranquility of the occupants of residential property will not be impaired because of the location or nature of the construction activity.

As described in detail under Impact NOI-1 in Section 3.11, *Noise*, with implementation of the proposed noise barriers and Construction Noise Management Plan under MM NOI-1, construction activities associated with the proposed Project would result in noise levels that exceed applicable Federal Transit Authority (FTA) thresholds at sensitive residential receptors in West Torrance adjacent to Flagler Lane and Flagler Alley as well as residences in the City of Redondo Beach along Beryl Street to the north of the Project site. Construction noise levels would not exceed FTA thresholds at Towers Elementary School.

Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to this issue.

Comment SY-14

The comment questions what determines the feasibility of the construction of noise barriers to mitigate construction noise levels at the Project site. As described in Section 3.11, *Noise* under Impact NOI-1, the feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership. Again, as discussed under Impact NOI-1, for these reasons noise barriers are most commonly developed to a height of between 10 and 30 feet.

With regard to the question of who will determine feasibility, MM NOI-1 requires that BCHD prepare a Construction Noise Management Plan for approval by the Redondo Beach and Torrance Building & Safety Divisions, in accordance with TMC Section 46.3.1. Therefore, BCHD and the Redondo Beach and Torrance Building & Safety Division will determine specific dimensions of the noise barriers and develop other noise reduction measures in coordination with one another.

The comment asks about the height of the proposed RCFE Building. As described in Section 2.5.1.2, Project Architecture and Design, proposed RCFE Building would have a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below. With implementation of a 30-foot noise barrier, sensitive receptors would not be directly impacted by construction noise until development reached a height that exceeded the noise barrier (refer to Table 3.11-19 and Table 3.11-20).

The comment also asks whether construction activities would stop or be prohibited if they result in noise above the FTA criteria. The purpose of the EIR is to disclose potential environmental impacts that could result from the implementation of the proposed Project. As described in Impact NOI-1, implementation of the proposed Project would result in noise levels that would exceed the FTA thresholds. Therefore, the EIR has determined that there would be a temporary, but prolonged significant and unavoidable noise impact related to construction noise. If the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall “*state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record*” (CEQA Guidelines Section 15093[b]).

Comment SY-15

The comment asks about the number of auger rigs that would be used during construction and the noise level associated with this equipment, as well as the duration of its use on-site. As described in Section 2.5.1.6, *Construction Activities*, one track-mounted auger rig would be used for tiebacks. An auger would be used during excavation and shoring activities during construction of Phase 1 and Phase 2 of the proposed Project. The Construction Noise Handbook prepared by the U.S. Department of Transportation, auger rigs can result in noise levels of 84 dBA L_{max} at 50 feet. However, it should be noted that this piece of equipment would be used along with other construction equipment on the Project site. A detailed list of heavy construction equipment was developed by CBRE as a part of the Construction Management Plan and was included in the construction noise model included in Appendix I. The construction noise model prepared for the proposed Project models the cumulative noise impact of the equipment that would be operating on-site. The construction noise model also takes into account the duration of time that it would take to complete the construction activity, rather than the specific number of times it would be used. It should also be noted that the construction noise model conservatively assumes this equipment would be used over the full duration of excavation activities (3 months), while shoring would realistically only occur over a couple weeks, as described in the Construction Management Plan. Together with the other equipment that would be used during the excavation and shoring phase, construction noise levels would be up to 85 dBA L_{eq} at the nearest sensitive noise receptors, the West Torrance residents adjacent to Flagler Lane and Flagler Alley (refer to Table 3.11-16 and Table 3.11-17). These noise levels would be further reduced with the implementation of noise barriers as required by MM NOI-1 (refer to Table 3.11-19 and Table 3.11-20).

Comment SY-16

The comment questions the duration of asphalt demolition, what tools or equipment would be used for asphalt demolition, and the noise levels associated with these tools. As described in detail in Section 2.5.1.6, *Construction Activities*, Phase 1 asphalt demolition, excavation, grading, and utility work would occur over a 2-month period. The types of equipment that would be used for these activities are also listed in this section. Refer also to Table 3.11-15 for a summary of typical ranges of L_{\max} noise levels at 50 feet for typical heavy construction equipment.

Comment SY-17

The comment questions what tools or equipment would be used for excavation activities as well as the noise level associated with this equipment. The comment also requests the noise levels associated with Project-related construction haul traffic. Refer to Section 2.5.1.6, *Construction Activities* for a list of the types of construction equipment that would be used during excavation activities. Refer also to Table 3.11-15 for a summary of typical ranges of L_{\max} noise levels at 50 feet for typical construction equipment that would be used during construction. The estimated peak period construction traffic noise levels at sensitive receptors are presented in Table 3.11-21 in Section 3.11, *Noise*. Haul trucks typically generate traffic noise levels of 85 dBA L_{\max} at 50 feet (FHWA 2008). As detailed under Impact NOI-1 in Section 3.11, *Noise*, temporary construction-related trips would increase daytime noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). The greatest increase in noise levels from construction-related trips would be an increase of 1 dBA on North Prospect Avenue to 70.8 dBA L_{eq} during Phase 1 construction. Other roadways along the haul route would experience a similar increase in noise levels. Noise contributions from these haul truck trips would be imperceptible (i.e., less than 3 dBA). In addition, the Construction Traffic and Access Management Plan under MM T-2, would require that construction haul trucks avoid residential neighborhoods. Therefore, noise impacts from construction-related vehicle trips would be less than significant.

Comment SY-18

The comment states that Beryl Street is a 2-lane road and therefore heavy haul trucks would not be able to operate along the inner lane during construction hauling near Towers Elementary School. As described in Master Response 13 – Transportation Analysis and Comment Response KB-3, in response to comments from TUSD and the City of Torrance, the proposed haul routes have been revised in the Final EIR as follows:

- The road segment of Beryl Street between Flagler Lane and West 190th Street would be avoided. Outbound haul trucks would instead leave the Project site from Flagler Lot by

traveling west on Beryl Street, north on North Prospect Avenue, and west on West 190th Street towards I-405.

- The segment of Prairie Avenue between 190th and Artesia would also be avoided. Inbound haul trucks would instead arrive at the Project site from I-405 by either traveling west on Artesia Boulevard before turning south on Hawthorne Boulevard or exiting I-405 onto Hawthorne Boulevard, turning west on Del Amo Boulevard, and north on North Prospect Avenue.
- The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element.

BCHD has incorporated these suggested revisions in keeping with MM T-2, which requires that the proposed haul routes are “*consistent with the Redondo Beach and Torrance General Plan designations.*”

The comment requests the difference in noise levels associated with haul trucks driving along the outer lane and inner lane of 190th Street or Del Amo Boulevard and who will enforce this mitigation. As previously described, according to the Federal Highway Administration (FHWA), haul trucks typically generate traffic noise levels of 85 dBA L_{max} at 50 feet.

The comment also questions who is a sensitive receptor. Refer to Table 3.11-5 for a list of noise sensitive land uses within 1,000 feet of the Project site.

Comment SY-19

The comment questions how notice of construction activities to the residents and businesses within 0.25-mile of the Project site prior to construction activities would mitigate construction noise. This measure would be implemented as part of the Construction Noise Management Plan for the proposed Project. Among the other measures included as part of the plan, this measure would ensure residents and businesses in the vicinity of the Project are notified of the start of construction and understand what to expect in terms of activity schedules. Further, BCHD would be required provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise.

Comment SY-20

The comment questions the enforceability MM NOI-1, particularly the telephone line that would be provided by BCHD. As described in MM NOI-1, during construction, BCHD would be required

to monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Construction Noise Management Plan. Further, BCHD would be required provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD would be required keep a log of complaints and address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions would have the authority require modification to the conditions of the Construction Noise Management Plan for construction-related activities within their respective jurisdictions, to address non-performance issues. CEQA Guidelines Section 15097 require that the lead agency adopt a MMRP for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” An MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment SY-21

The comment makes unreferenced claims that the use of jackhammers would produce noise levels of 130 dBA. As described in Table 3.11-15, the U.S. Department of Transportation reports that the operation of jackhammers (without the use of noise control devices or other noise-reducing design features) produce noise levels of 81 to 89 dBA L_{max} at 50 feet from the source.

As previously described, a list of typical construction equipment that would be used for construction of the proposed Project is included in Section 2.5.1.6, *Construction Activities* and a more detailed list of heavy construction equipment developed by CBRE as a part of the Construction Management Plan is included in Appendix I.

The comment goes on to ask a series of questions regarding the proposed use and associated noise levels of chainsaws during Project construction. The comment also makes unreferenced claims that the use of chainsaws would produce noise levels of 120 dBA. As described in Table 3.11-15, the U.S. Department of Transportation reports that the operation of chainsaws (without the use of noise control devices or other noise-reducing design features) produce noise levels of 72 to 82 dBA L_{max} at 50 feet from the source. As previously noted, the construction noise model conservatively models the cumulative noise impact of all equipment that would be used onsite at the same time. As described in Table 3.11-16, the nearest noise sensitive receptors to the proposed Phase 1 construction activities are the West Torrance residences located approximately 80 feet away. Therefore, unmitigated construction noise levels are projected to be up to As described in

Table 3.11-17, the nearest noise sensitive receptors to the proposed Phase 2 construction activities would be the on-site RCFE Building Assisted Living and Memory Care residents.

Comment SY-22

The comment provides a series of questions related the construction-related noise, the students at Towers Elementary School, and the number of residents in the Project vicinity that have lung-related and other terminal diseases. As previously stated, BCHD has revised the proposed haul routes (refer to the response to comment KB-3 as well as Master Response 13 – Transportation Analysis and Comment Response), which TUSD has acknowledged would reduce potential off-site construction noise impacts at Towers Elementary School. Further, on-site construction noise levels would not exceed FTA thresholds at Towers Elementary School (refer to Table 3.11-16 and Table 3.11-17).

Regarding the number of residents in the vicinity of the Project site that have lung-related and other terminal diseases, this comment is not germane to the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment SY-23

The comment expresses concern regarding the use of Flagler Lane for trash hauling and questions the frequency of trash hauling. The comment again questions whether the City of Torrance has approved the use of Flagler Lane, a local Torrance street, for the proposed Project. As described under Impact NOI-3 in Section 3.11, *Noise*, trash hauling would occur over an average of 3 days per week, although frequency could increase in summer and immediately following community events on the central lawn or private events at the proposed Aquatics Center. Regarding the site access along Flagler Lane, refer to Comment Response SY-5.

Comment SY-24

The comment claims that the use of heavy construction vehicles, equipment, haul trucks, and trash hauling trucks would damage the local streets surrounding the Project site. The construction vehicles, equipment, haul trucks, and trash hauling trucks that would be used for construction and operation of the proposed Project would be typical of common construction equipment and trash trucks currently operating in the vicinity of the Project site. For example, the construction equipment and trucks that would be used for the proposed Project would be similar to those used for construction of the Kensington Assisted Living Facility in Redondo Beach. Further, trash haul trucks used at the Project site would be consistent with existing trash activities occurring both on-site and in the vicinity. Existing businesses located within the Redondo Village Shopping Center

already receive deliveries and trash pick-up via Beryl Street. Additionally, garbage collection also occurs for existing residences within Torrance.

Comment SY-25

The comment describes the measures for decontamination and washing of equipment that comes into contact with potential contaminated soil or water and questions how BCHD will collect and dispose of contaminated water to prevent contaminated stormwater runoff. The EIR thoroughly discloses and addresses the potential for water quality impacts due to contaminated soil and water runoff during construction under Impact HYD-1 in Section 3.9, *Hydrology and Water Quality*. As discussed therein, due to the substantial amount of proposed excavation and the potential for extended periods of exposed soils, soil erosion could result in the creation of on-site rills and gullies, clogs in the existing drainage system, and transport of suspended sediments into down-gradient areas of the Project site. This stormwater runoff could also contain eroded construction and demolition debris and associated hazardous materials that would potentially further degrade surface water quality in the vicinity of the Project site. However, potential adverse effects on water quality associated with construction activities would be reduced through compliance with the requirements of the Construction General Permit (State Water Resources Control Board [SWRCB] Order No. 2009-0006-Data Quality Assessment). Prior to beginning any demolition, grading, or construction activities, BCHD must obtain coverage under the General Construction Permit by preparing and submitting a NOI and SWPPP for review and approval by the Los Angeles Regional Water Quality Control Board (RWQCB). In accordance with the Stormwater Management and Discharge Control Ordinance, the BMPs developed for the proposed Project would also be incorporated into a Storm Water Mitigation Plan (SUSMP) to be approved by the Redondo Beach DPW Engineering Services Division and Torrance Public Works prior to the initiation of construction-related activities. The SUSMP would require that BMPs minimize pollutants and reduce stormwater runoff to levels that comply with applicable water quality standards (refer to Impact HYD-1 for detailed discussion of the BMPs that would be required under the SUSMP). Implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of the proposed Project. Therefore, construction-related impacts to water quality would be less than significant.

Letter SK1

June 10, 2021
Sabrina Kerch

Comment SK1-1

The comment claims that the bulk, scale, and height of the development under the proposed Healthy Living Campus Master Plan would block sunlight, blue sky views, and sunsets. Further the comment asserts that it is irresponsible to suggest that residual impacts are less than significant, based on long-range view of the Palos Verdes ridgeline.

First, the comment conflates impacts to scenic views, impacts to the visual character of the Project site and surrounding areas, and impacts to shade and shadows. The EIR does not make any findings to neighbor character based on long-range views from the intersection of Flagler Lane & 190th Street. Impacts to neighborhood character are addressed under Impact VIS-2. These findings are substantiated by photosimulations from five different locations located immediately adjacent to or in close proximity to the campus (refer to Figure 3.1-1) as well as a policy consistency analysis (refer to Table 3.1-2). As described for Representative View 2, Representative View 3, and Representative View 4, would noticeably alter the existing views of the Project site from these locations and would reduce blue sky views as the comment suggests; however, the development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from these locations. In fact, the proposed Project includes many attributes that would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the BCHD campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to issues related to building height and visual character.

Impacts associated with access to sunlight (i.e., shade and shadows) are thoroughly addressed under Impact VIS-4, which is supported by a Shade and Shadow Study (see Appendix M). The shade and shadow study prepared for the proposed Project demonstrate that the adjacent residential

structures in Torrance, including on Towers Street, Tomlee Avenue, Mildred Avenue, and Redbeam Avenue would be shaded beyond existing shadows, particularly during the Fall and Winter evenings during Phase 1 and Phase 2 (see Appendix M). However, the vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the BCHD campus and the Torrance residences below. During the Fall and Winter, the proposed RCFE Building would also cast shadows on Towers Elementary School – including the recreational field – in the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice). The latest dismissal time for Towers Elementary School students is at 3:12 p.m. for 4th and 5th graders; however, and Towers Elementary School closes at 4:00 p.m. Therefore, shadows cast by the proposed RCFE Building would not have a significant adverse effect on Towers Elementary School. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to issues related to shade and shadows.

The comment also asserts that the proposed Project would block ocean breeze, but does not provide any supporting information to substantiate this assertion that a single development would disrupt regional offshore and onshore wind patterns.

Letter SK2

June 3, 2021
Sang Kim

Comment SK2-1

The comment expresses opposition for the proposed Project, and asserts, without substantial evidence, that the size of the proposed Project being incompatible with the surrounding neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Comment SK2-2

The comment states that the Draft EIR does not adequately consider alternatives to mitigate impacts, such as positioning development on the western edge of the Project site or incorporating more subterranean levels. Refer to the response to Comment AW-15 and AW-31 regarding the site planning constraints associated with the existing Beach Cities Health Center. These comments summarize the rationale for the development of the building footprint and the revisions to the

proposed Healthy Living Campus Master Plan aimed at minimizing the building frontage along the eastern boundary of the BCHD campus.

Comment SK2-3

The comment states, without substantial evidence or expert opinion, that construction-related dust, noise, and heavy haul trips would disturb the surrounding neighborhood. These issues are addressed in detail in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation*. This analysis is supported by technical studies and exhaustive quantities modeling efforts by experts in their field. The comment provides no specifics or further details clarifying these concerns or challenging specific aspects of the thresholds, methodologies, or impact analysis provided in the EIR. It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1.

Comment SK2-4

The comment states, without substantial evidence or expert opinion, that a project of the proposed scale does not belong in the neighborhood. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Letter SL1

April 2, 2021
Sheila W. Lamb

Comment SL1-1

The comment summarizes one of the six project objective and requests analyses of forecasted future community health needs, forecasted cost of future health needs, forecasted revenue requirements for future community health needs, and existing and future demand for meeting spaces and interactive education for Beach Cities residents. Refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives for a detailed discussion pertaining to the underlying drivers for the proposed Project. As described in Master Response 6 – Financial Feasibility/Assurance the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not

require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (*Sierra Club v. County of Napa* [2004] 121 Cal. App. 4th 1490, 1503).

Letter SL2

April 2, 2021
Sheila W. Lamb

Comment SL2-1

The comment requests the names of Beach Cities residents who received services from the Beach Cities Health District Campus (BCHD) campus in 2020 and the types of services received. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. However, it should be noted that existing residents, patients, visitors, and staff were estimated for the quantitative study using driveway counts, pedestrian surveys, Center for Health and Fitness (CHF) membership scans, etc. This information was collected by Fehr & Peers and used to inform the development of the existing trip generation associated with the BCH campus.

Letter SL3

April 13, 2021
Sheila W. Lamb

Comment SL3-1

The comment incorrectly states the EIR omits the Redondo Beach’s zoning definition of P-CF and permitted land uses under this definition. The comment also states P-CF zoning is not intended for commercial enterprises. As provided in Section 3.10.2, Regulatory Setting, “*Areas zoned as P-CF (Community Facilities) provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community (RBMC Section 10-2.1110). Under RBMC Section 10- 2.1110, residential care facilities are allowed in areas zoned as P-CF with a conditional use permit (CUP).*” Refer to Master Response 7 – Project Compatibility with P-CF Zoning Land- Use Designation for a detailed discussion and response to comments pertaining to this issue.

Comment SL3-2

The comment claims the EIR mischaracterizes the scope and reach of BCHD programs and services. The comment also asserts BCHD cannot prove it provides services to 123,000 residents. As described in the response to Comment SL2-1, this comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives.

Comment SL3-3

The comment states, without substantial evidence, that due to the height and size of proposed structures, the proposed development would be visually incompatible with the surrounding neighborhood, block views of the Palos Verdes hills, block skyline views, create shadow effects, and create privacy issues. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for detailed discussion and response to comments pertaining to these issues. The comment provides no substantial evidence or expert opinion that challenges the impact analysis provided in Section 3.1, *Aesthetics and Visual Resources*, which is supported by photographs, computer-generated photosimulations, and a shade and shadow analysis, prepared by licensed architects.

Comment SL3-4

The comment claims that that less than 20 percent of tenants of the proposed facilities will be from the Beach Cities while the surrounding neighborhoods will be adversely impacted by construction and operation of the proposed Project. First it should be noted that the market feasibility study prepared by MDS Research Company, Inc. and peer reviewed by Cain Brothers identifies that a large majority (i.e., 70 percent) of the proposed Assisted Living program and Memory Care community residents would come from within 5 miles of the BCHD campus, referred to in the study as the Primary Market Area. It should also be noted that BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services.

Finally, the EIR includes adequate analysis of potential adverse physical effects the proposed Project may have on the community, including Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; Section 3.11, *Noise*; and Section 3.14, *Transportation*. The EIR also analyzes for effects on community services and population and housing, including Section 3.12, *Population*

and Housing; Section 3.13, *Public Services*; Section 3.15, *Utilities and Service Systems*; and Section 4.0, *Other CEQA Considerations*. The comment does not challenge the thresholds, methodologies, or findings of this extensive analysis, which is supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

Letter SL4

June 9, 2021
Sheila Lamb

Comment SL4-1

This comment restates the project pillars and project objectives identified in the Executive summary and Section 2.4.3, *Project Objectives*. The comment claims that the Beach Cities Health District (BCHD) has not satisfactorily demonstrated that the proposed development would generate sufficient revenue, that there are existing or future community health needs that BCHD has identified, or that there is a need for the proposed Assisted Living program. For a detailed discussion and response to comments pertaining to these issues refer to Master Response 3 – Project Need and Benefit and Master Response 4 – Project Objectives.

Comment SL4-2

The comment claims that the alternatives do not show evidence of ability to execute the purpose and objectives of the proposed Project. The comment goes on to claim that two of the alternatives focus on maximizing revenues. It should be noted that this comment appears to be based on the alternatives discussion presented in the Executive Summary. Section 5.0, *Alternatives* provides a detailed discussion of each of the six alternatives that we considered. Each of these analyses provides a detailed discussion on the achievement of each project objective described in Section 2.4.3, *Project Objectives*. The assertion that two of the alternatives focus solely on revenue generation is unfounded, particularly given that revenue generated by the proposed Project or any of its alternatives would be invested into community health and wellness programs and services. The comment also notes that Alternative 6 was not identified in Table ES-2 and Table 5.5-5. This inadvertent omission has been corrected in the Final EIR; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

Comment SL4-3

The comment notes that Alternative 6 was not identified in Table ES-2 and Table 5.5-5. This inadvertent omission has been corrected in the Final EIR; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.

Comment SL4-4

The comment cites Section 2.2.5, *Existing Land Use Designations and Zoning* and incorrectly states that there is no language stating human health in the P section of the Land Use Element. The definition of the P land use is taken directly from Policy 1.46.1, which states:

“1.46.1 Accommodate governmental administrative and maintenance facilities, parks and recreation, public open space, police, fire, educational (schools), cultural (libraries, museums, performing and visual arts, etc.), human health, human services, public utility and infrastructure (transmission corridors, etc.), public and private secondary uses, and other public uses in areas designated as ‘P’ (II.1).”

Comment SL4-5

The comment asserts that the proposed Project would alter the visual character of the Project site and surrounding areas in Redondo Beach. It should be noted that under the California Environmental Quality Act (CEQA), aesthetic impacts are qualitative in nature, and generally occur where physical changes would conflict with adopted development standards and would substantially degrade the visual character or quality of public views of the site and its surroundings as set forth in Appendix G of the CEQA Guidelines. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

As described in Redondo Beach Municipal Code (RBMC) Section 10-2.1116 the Floor Area Ratio (FAR), building height, number of stories, and setbacks for development within the PC-F zoning district are subject to Planning Commission Design Review. The comment cites RBMC Section 10-2.2502, which guides the Planning Commission Design Review. As described in Section 3.1, *Aesthetics and Visual Resources* and Section 3.10, *Land Use and Planning*, the Planning Commission Design Review could further revise the proposed Project (e.g., limit FAR, building height, setbacks, etc.); however, the EIR appropriately defines and further analyzes the maximum disturbance envelope pursuant to the requirements of CEQA.

Comment SL4-6

The comment selectively cites various General Plan land use policies and RBMC sections and claims that the proposed Assisted Living program is not permitted on the Project site, which is zoned as P-CF. However, as described in Section 3.10, *Land Use and Planning* areas zoned as P-CF (Community Facilities) provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community (RBMC Section 10-2.1110). Under RBMC Section 10-2.1110, residential care facilities are clearly allowed in areas zoned as P-CF with a conditional use permit (CUP). As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks are subject to Planning Commission Design Review.

Comment SL4-7

The comment states that the proposed Project would increase noise levels in the local neighborhood during construction. This issue is extensively addressed in Section 3.11, *Noise*, with findings supported by exhaustive quantitative modeling. The comment states that noise levels would range between 73 and 98 dBA; however, as shown in Table 3.11-19 and Table 3.11-20, with the implementation of the required Mitigation Measure (MM) NOI-1, noise levels would range between 60 and 82 dBA during Phase 1 and 63 and 83 dBA during Phase 2. Nevertheless, noise levels at sensitive receptors would exceed the FTA *Transit Noise and Vibration Impact Assessment Manual*, of an 8-hour continuous noise level (L_{eq}) of 80 dBA and a 30-day average of 75 dBA L_{dn} .

Comment SL4-8

The comment describes that California Supreme Court Decision *Sierra Club v. County of Fresno*, Cal. Supreme Court Case No. S219783 (Dec. 24, 2018), makes clear that EIR's must contain clear and detailed discussion of impact significance determinations. The comment goes on to state that In particular, an EIR must explain the nature and magnitude of significant impacts in a manner that adequately informs the public about the health effects of the project's significant impacts.

It should be noted that this case, commonly referred to as the Friant Ranch Case, is summarized in Section 3.2, *Air Quality*. As described therein the California Supreme Court held that the EIR for the Friant Ranch Project – a 942-acre master-planned, mixed-use development with over 2,500 senior residential units, 250,000 square feet (sf) of commercial space, and extensive open space/recreational amenities on former agricultural land in north central Fresno County – was deficient in its informational discussion of air quality impacts as they relate to adverse human health effects.

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District (SCAQMD) in the Friant Ranch case (April 6, 2015, Attachment A), SCAQMD concluded that currently available regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations associated with individual projects. Regional modeling tools are generally designed to be used at the national, State, regional, and/or city levels and are not well equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project directly impact human health in a particular area. Even where a Health Risk Assessment (HRA) can be prepared, however, the resulting maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer or non-cancer health risks as a result of the project.

For local plans or projects that exceed any identified SCAQMD air quality threshold, EIRs typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or an individual project and a particular health effect. In addition, no relevant agency has approved a quantitative method to reliably and meaningfully do so. A number of factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature of the relationship between air pollutants and health effects in conjunction with local environmental variables. Therefore, at the time, it is infeasible for this EIR to directly link a plan's or project's significant air quality impacts with a specific health effect.

As described in Section 3.2, *Air Quality*, which was supported by an exhaustive quantitative modeling effort, with the implementation of Mitigation Measure (MM) AQ-1 construction activities would not result in criteria air pollutants or toxic air contaminants (TACs) that would exceed the SCAQMD thresholds, which are the accepted thresholds to assess potential air quality impacts within the South Coast Air Basin.

As described in CEQA Guidelines Section 15204(c), “[r]eviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” No substantial evidence has been presented in this comment to suggest that there would be any other health-related impacts associated with shade and shadows, lighting, noise, electromagnetic fields (EMF), toxic water runoff, etc.

Letter SW1

June 7, 2021
Shirley Wang

Comment SW1-1

The comment expresses general opposition to the proposed construction-related activities, citing general concerns relating to privacy, noise, and traffic as reasons of opposition. The comment also raises concerns about hazardous materials caused by demolition and construction activities, which the comment asserts could be harmful to kids health (e.g., at Towers School). (For clarity the comment asserts that Towers Elementary School is located 100 feet from the Project site; however, as described in the Environmental Impact Report [EIR] it is located approximately 350 feet from the Project site.)

These concerns that have been raised by the comment are thoroughly addressed in the EIR (refer to Section 3.1, *Aesthetics and Visual Resources*, Section 3.11, *Noise*, and Section 3.14, *Transportation*). In fact, significant and unavoidable impacts are identified for noise under Impact NOI-1. The comment does not challenge any of these analyses or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 12 – Noise Analysis, Master Response 11 – Hazards and Hazardous Materials Analysis, and Master Response 13 – Transportation Analysis for a detailed discussion and response to these issues. Privacy concerns relating to development of the proposed Residential Care for the Elderly (RCFE) Building are also addressed in Master Response 9 – Aesthetics and Visual Resources Analysis.

Letter SW2

June 15, 2021
Simona Wilson

Comment SW2-1

The comment includes an attached image of a flyer that is not produced by the Beach Cities Health District (BCHD) or Wood Environment & Infrastructure Solutions, Inc. (Wood) and requests further collaboration. Neither of the aforementioned parties have contacted the commenters regarding the flyer. This comment is not germane to the Environmental Impact Report (EIR) or its evaluation of physical environmental impacts.

Letter SGD

April 13, 2021
Stephanie & Gary Dyo

Comment SGD-1

The comment expresses general opposition of the proposed Project, identifying the size, height, noise impact, and cost as reasons for opposition. The comment claims, without substantial evidence, that such concerns have been ignored. These issues are clearly addressed in Section 3.1, *Aesthetics and Visual Resources* as well as Section 3.11, *Noise* of the Environmental Impact Report (EIR), which are supported by technical studies and modeling by experts in their fields. With regard to the cost of the proposed Project, refer to Master Response 6 – Financial Feasibility/Assurance. For issues related to general opposition to the proposed Project, refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment SGD-2

The comment expresses concern regarding construction-related noise and air quality impacts adversely affecting the health of nearby residences and children. The comment asserts, without substantial evidence or expert opinion, that air pollution would increase as a result of the proposed Project. The comment also restates the EIR's finding that noise levels would exceed the Federal Transit Authority (FTA) threshold.

Construction emissions are quantified and shown in Table 3.2-5. As demonstrated described at length in Section 3.2, *Air Quality*, with implementation of Mitigation Measure (MM) AQ-1 emissions generated by construction of the proposed BCHD Healthy Living Campus would not exceed South Coast Air Quality Management District (SCAQMD) thresholds and would not create or contribute to air quality violations. This finding is supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. Refer to Master Response 10 – Air Quality Analysis for detailed discussion of construction-related impacts on air quality, including those on nearby sensitive receptors, which include Towers Elementary School and single-family residences located in the vicinity of the Project.

It should be noted that the only significant and unavoidable impact associated with the proposed Project would be a temporary, but prolonged, increase in noise during construction activities, which is described in detail in Section 3.11, *Noise* under Impact NOI-1. However, while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17). Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction-related noise impacts.

Comment SGD-3

The comment claims that the implementation of the proposed Project would cause traffic congestion, namely among Del Amo Boulevard, North Prospect Avenue, and Beryl Street. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction-related activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

Comment SGD-4

The comment states the current proposed Project is taller and larger than previous iterations and claims, without substantial evidence, that the proposed Project would not fit with the neighborhood character. The comment also states the proposed Project would block views of the Palos Verdes Hills and skyline and create privacy issues with nearby residences. Refer to Master Response 9 –

Aesthetics and Visual Resources for a detailed discussion and response to comments pertaining to these issues. As described in Section 1.6.1, *Summary of Revisions to the Proposed Healthy Living Campus Master Plan*, conceptual plans for the proposed Healthy Living Campus Master Plans have gone through reiterations in response to community feedback. While the current Healthy Living Campus Master Plan increased the height of the proposed Residential Care for the Elderly (RCFE) Building to 103 feet above the campus ground level, the redesigns also downsized development envisioned in the Healthy Living Campus Master Plan by 107,800 square feet (sf) of occupied building space than proposed under the 2019 Master Plan. Further, as described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1, the proposed RCFE Building would interrupt views of the Palos Verdes hills from Representative View 6. However, implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level to approximately 82.75 feet above existing ground level, ensuring views of the Palos Verdes hills from the Representative View 6 would not be interrupted by the proposed development. As described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2, although the height and mass of the proposed Residential Care for the Elderly (RCFE) Building would be greater than what currently exists and is visible on-site, implementation of the Phase 1 preliminary site development plan would change, but not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this location.

Comment SGD-5

The comment states rent for the Assisted Living units and Memory Care units would be unaffordable. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to this issue.

Comment SGD-6

The comment suggests the proposed Project be relocated from Torrance to a different Beach City.. As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities were considered. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned P-CF (Community Facility), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate

these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. However, there are no undeveloped or underdeveloped sites designated as PF within Hermosa Beach, which are also large enough to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan. Similarly, properties designated as Public Facilities within Manhattan Beach are developed and not currently available for purchase. Development at alternate sites within the Beach Cities may also be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project. Additionally, none of the potential alternate sites within the Beach Cities are under ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. Therefore, alternative locations in the Beach Cities were determined not to be feasible for development of the proposed Healthy Living Campus Master Plan.

Letter SD

June 6, 2021
Stephanie Dyo

Comment SD-1

The comment expresses general opposition towards the proposed Project and associated construction period. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment SD-2

The comment expresses general concern regarding the height of the proposed Residential Care for the Elderly (RCFE) Building and associated shade and shadow impacts, asserting that the development will block sunlight and views from all directions. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.2, *Aesthetics and Visual Resources* or provide any substantiating evidence to further support its assertions. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and responses to issues related to shade and shadow effects and potential impacts on views that could result from the development of the proposed RCFE Building.

Comment SD-3

The comment expresses general concern for potential impacts to nearby residences and the nearby school associated related to hazards and hazardous materials. The comment notes that homes and schools are located from 80 to a few hundred feet away. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.8, *Hazards and Hazardous Materials* or provide any substantiating evidence to further support or clarify its concerns. As described in Section 3.8.4, *Project Impacts and Mitigation Measures*, compliance with applicable regulations as well as oversight by the appropriate Federal, State, and local agencies, implementation of applicable of best management practices, and application of prepared mitigation measures would prevent the accidental release of hazardous materials into the environment during construction and operation of the proposed Project. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis for a detailed discussion and response to these issues.

Comment SD-4

The comment expresses general concern for construction-related neighborhood traffic. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction-related activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

Comment SD-5

The comment claims the issues in Comment SD-1 through SD-4 have been ignored and therefore the proposed Project should be stopped. As described in the responses to Comment SD-1 through SD-4 these issues have clearly been addressed in detail within Section 3.1, *Aesthetics and Visual Resources*, Section 3.8, *Hazards and Hazardous Materials*, and Section 3.12, *Transportation*. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter SII

June 4, 2021
Stephanie Ishioka

Comment SII-1

The comment expresses general concern regarding shade and shadow impacts following construction of the proposed Residential Care for the Elderly (RCFE) Building, noting that the building reach a height of 133 feet over the street level. The comment asserts that under existing conditions it is dark around 4:00 p.m. after the end of daylight savings time in November. The comment asserts that adjacent residences may need to turn lights on as early as 3:00 p.m. and inquires about compensation for extended electricity use due to potential shade and shadow impacts. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact VIS-4, the vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (see Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center in the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the BCHD campus and the Torrance residences below. Shadow-sensitive uses would not be shaded by the proposed structures for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be less than significant when compared with the thresholds established in the EIR (refer to Section 3.1.3, *Impact Assessment and Methodology*). Compensation for electricity use is neither required nor appropriate, particularly given the limited extent and short duration of shading. Refer to Master

Response Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to shade and shadows.

Comment S11-2

The comment states the height of the proposed RCFE Building would be the third tallest building in the Beach Cities. This issue is identified (refer to Table 3.1-1) and fully addressed under Impact VIS-1, which identifies a potentially significant impact to scenic views of the Palos Verdes ridgeline from Flagler Lane & 190th Street. For issues related to building height and neighborhood compatibility refer to Master Response 9 – Aesthetics and Visual Resources Analysis. The comment also states that the proposed Project would not be compatible with the surrounding neighborhood the comment does not challenge any specific aspects of the analysis presented under Impact VIS-2 and does not provide any substantiating evidence to further support its assertions. For a detailed discussion and response to comments pertaining to building height and neighborhood compatibility refer to Response 9 – Aesthetics and Visual Resources Analysis.

Comment S11-3

The comment claims that the proposed RCFE Building would create privacy issues and require the use of window coverings. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to privacy concerns associated with the proposed RCFE Building.

Letter SI2

June 4, 2021
Stephanie Ishioka

Comment SI2-1

The comment generally summarizes the findings of the impact analysis provided in Section 3.11, Noise, including impacts to sensitive receptors located in proximity of the Project site. However, the comment incorrectly states that students at the nearby elementary school would experience noise levels up to 91 dBA. As shown in Table 3.11-16 and 3.11-17, construction noise levels at Towers Elementary School would reach up to 74 dBA. As described in Table 3.11-20, with the construction of the required noise barrier, construction-related exterior noise at Towers Elementary School would be reduced to 55 dBA. (It should also be noted that the EIR modeled noise to the edge of the Towers Elementary School boundary approximately 350 feet from the BCHD campus. However, the indoor learning environment is separated from the BCHD campus by a recreational field and is located approximately 735 feet from the proposed construction activities.) Refer to

Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to construction-related noise impacts on sensitive receptors.

Comment SI2-2

The comment expresses concern that vibration generated by heavy machinery and heavy haul trucks would cause landslides along nearby slopes including the on-site slope adjacent to Flagler Alley. As described in Section 3.11, Noise, under Impact-2, vibration levels from construction equipment and haul trips associated would not exceed the Federal Transit Authority (FTA) thresholds and impacts would be less than significant. Geologic stability of the Project site and surrounding region, including susceptibility of landslides is described in Section 3.6, Geology and Soils. According to the California Geological Survey (CGS) Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone. Similarly, according to the Redondo Beach Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides. Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very low.

Letter SJC

June 10, 2021
Stephen J. Curwick

Comment SJC-1

The comment objects to the development of the proposed Southern California Edison (SCE) Substation Yard due to its proximity to residences. The comment notes the existing hillside and landscaping currently act as a buffer between the Project site and neighboring residences. The comment also recommends alternate locations for the proposed electrical substation, including between the 512 parking structure and Flagler alley, the northern edge of the Project site, or behind the proposed Residential Care for the Elderly (RCFE) building. However, as described in Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard, potential locations for the new substation and electrical yard are limited to areas where: the substation could be installed early in the project timeline (i.e., outside of active construction zones); the substation would be readily accessible by truck for SCE service and maintenance activities during all phases of project construction and operation; and existing utility connections are present. As such, location of the new substation yard, generator yard, and gas valve enclosure is limited to the

southeastern hillside of the Project site. The substation would be constructed at the toe of the slope adjacent to Flagler Alley, surrounded by a perimeter wall, and screened by proposed landscaping. Nevertheless, this comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment SJC-2

The comment claims, without substantial evidence, that the proposed residential care facility units would be unaffordable to community members. Refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for detailed discussion and response to comments pertaining to this issue.

Comment SJC-3

The comment reiterates objection to the proposed electrical substation, stating this placement of the substation would render landscape buffering between the Project site and neighboring residences useless. The comment also expresses concern that the electrical substation would create a safety hazard to nearby residents. The comment also expresses concern construction associated with the substation would create air quality impacts that could affect the safety of nearby residences. Concerns regarding the landscape buffer of the Project site are addressed in Comment SJC-1. Refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for discussion on the placement and safety concerns related to the proposed substation. Refer also to Master Response 10 – Air Quality Analysis for detailed discussion of construction and operational air quality impacts on nearby sensitive receptors, which include single-family residences located in the vicinity of the proposed Project.

Comment SJC-4

The comment states that implementation of the proposed Project, including placement of the proposed substation, would negatively affect neighboring property values. However, the purported loss of property value does not constitute physical environmental issues as clearly set forth in CEQA Guidelines Section 15131, which are the subject of the analysis in this Environmental Impact Report (EIR) as required by CEQA.

Comment SJC-5

The comment reiterates objection to the proposed election substation due to potential health risks and loss of property values. Refer to the individual responses to Comment SJC-1 through SJC-4.

Letter SJ

May 24, 2021
Susan Johnson
19333 Sturgess Drive
Torrance

Comment SJ-1

The comment expresses general opposition to overdevelopment making unsupported claims that the proposed Project would create more traffic, crime, and homelessness. The comment suggests the City of Torrance focus on remaining clean and safe with accessible services. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

With regard to effects on public services, the EIR includes thorough assessment of potential for the proposed Project to affect public services within Redondo Beach and Torrance, including service ratios, response times, or other performance objectives of local police protection services. As described Section 3.13, *Public Services* under Impact PS-2, the increase in activity level at the Project site could generate the need for law enforcement services. However, the development under Phase 1 and Phase 2 of proposed Project would include the incorporation of security features such as access control to buildings, secured parking facilities, walls/fences with key systems, building entrances in high foot-traffic areas, and minimum dead space to eliminate areas of concealment. Additionally, the proposed Project would include new and updated security lighting on site, at vehicle entrances, pedestrian walkways, courtyards, driveways, and parking facilities, pursuant to the requirements of Redondo Beach Municipal Code (RBMC) Section 10-5.1706(c)(10). These measures would be effective in deterring criminal activity at the Project site so any increase in crime would not be substantial.

Letter SK3

April 28, 2021
Susan Kawamoto

Comment SK3-1

The comment provides a general statement of opposition to the proposed Project claiming that construction and operation of development under the proposed Healthy Living Campus Master Plan would result in impacts related to hazardous materials, noise, and traffic and to nearby

residents and schools. For a detailed discussion of and response to comments pertaining to these issues refer to Master Response 11 – Hazards and Hazardous Materials Analysis, Master Response 12 – Noise Analysis, and Master Response 13 – Transportation Analysis.

First, it should be clarified that while Phase 1 and Phase 2 would combine for a total construction period of 5 years; however, the comment fails to acknowledge that the implementation of Phase 1 would occur over a period 29 months followed by a substantial gap prior to the implementation of Phase 2 over a period of 28 months.

With regard to potential impacts to hazards and hazardous materials, the Environmental Impact Report (EIR) thoroughly discloses and discusses the existing conditions on the Project site, which was informed by the completion of Phase I and Phase II Environmental Site Assessment (ESAs). While the comment correctly states that tetrachloroethylene (PCE) was identified on the Project site, the comment fails to acknowledge that PCE is generally only hazardous when encountered in a confined space where it can exceed the Clean Air Act (CAA) limits and Occupational Safety and Health Administration (OSHA) exposure limits. Exposure to PCE in unconfined spaces presents very limited risk given its rapid volatilization (i.e., evaporation or dispersal in vapor form). This distinction is clearly described in the EIR with references from the Centers for Disease Control and Prevention as well as the Agency for Toxic Substances and Disease Registry (refer to Section 3.8, *Hazards and Hazardous Materials*). Therefore, with the implementation of the mitigation measures identified in the EIR (i.e., Mitigation Measure [MM] HAZ-2a through HAZ-2d) impacts associated with PCE would be less than significant. Additionally, the air quality analysis provided in the EIR is supported by a Health Risk Assessment (HRA), which determined that with the implementation of the mitigation measures identified in the EIR (i.e., MM AQ-1, which includes a requirement for U.S. Environmental Protection Agency [USEPA] Tier 4 engines), cancer risk and non-cancer health effects would remain below the thresholds established by the South Coast Air Quality Management District (SCAQMD) (refer to Section 3.2, *Air Quality* and Appendix B).

The comment also raises concerns about noise and vibration during construction, but does not challenge any specific aspects of the quantitative noise and vibration modeling provided in Section 3.11, *Noise*, which identifies a significant and unavoidable impact to adjacent sensitive receptors during construction. However, it should also be noted that the quantitative noise and vibration modeling demonstrated that schools in the area would not experience noise levels exceeding the established thresholds.

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to

decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter TT

Comment TT-1

The comment references an uncited study by University of California Berkeley concerning sexually transmitted diseases in nursing homes. The comment does not cite the study, provide a link, or provide the title of the study. This comment does not address adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. The Assisted Living program and Memory Care community would operate within accordance of all applicable Federal, State, and local health guidelines as well as State license requirements.

Letter TO1

April 5, 2021
Tim Ozenne

Comment TO1-1

The letter inquires if the Environmental Impact Report (EIR) adopted the *City of Los Angeles Threshold Guide (2006)* and whether other similar manuals were reviewed or considered for adoption. For context California Environmental Quality Act (CEQA) Guidelines Section 15064.7(a) defines a “*threshold of significance*” as “...*an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.*” The Beach Cities Health District (BCHD) has not and is not required to formally adopted the *City of Los Angeles CEQA Thresholds Guide*. Pursuant to CEQA Guidelines Section 15064.7(b) lead agencies have discretion to formulate their own significance thresholds and may use thresholds on a case-by-case basis. CEQA Guidelines Section 15064.7(c) states that “[w]hen using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency...is supported by substantial evidence.”

As a matter of approach throughout the EIR, the thresholds of significance discussion for each of the environmental issue areas first considered the questions presented in Appendix G of the CEQA Guidelines. Then any adopted or commonly used thresholds from the City of Redondo Beach and the City of Torrance were considered, given the role of these cities as responsible agencies. Finally,

any relevant quantitative thresholds were considered including those published by relevant regulatory agencies, or those used by other local jurisdictions within the Greater Los Angeles Area.

As described in Section 3.1.3, *Impact Assessment and Methodology*, the CEQA Guidelines do not provide thresholds with respect to shade and shadow impacts. Additionally, neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. The *City of Los Angeles CEQA Thresholds* were identified as appropriate thresholds for analysis because they identify clear, unambiguous definitions of sensitive receptors as well as quantitative standards for when shade and shadows would affect such sensitive receptors. It should be noted that this approach is not unique and has been used by a wide number of local jurisdictions within Los Angeles County – including both coastal and inland areas – that do not have their own quantitative significance thresholds for shade/shadow impacts (e.g., City of Santa Monica, City of Long Beach, Culver City, etc.).

Letter TO2

April 6, 2021
Tim Ozenne

Comment TO2-1

The comment requests documentation demonstrating BCHD formally adopted the *City of Los Angeles CEQA Thresholds Guide (2006)*. Refer to the response to Comment TO1-1.

Letter TO3

May 25, 2021
Tim Ozenne

Comment TO3-1

The comment summarizes that the Beach Cities Health District (BCHD) is the lead agency for the proposed Project and notes the length of the Environmental Impact Report (EIR). The comment provides a summary of the topics addressed in the remainder of the comment letter. These topics include: BCHD’s authority to establish residential facilities, apparent size and compatibility of proposed structures, shade and shadow effects, vehicle traffic, the proposed Program of All-Inclusive Care for the Elderly (PACE) services, and benefits to cost ratio. These issues are described in further detail and responded to individually in the response to Comment TO3-2 through TO3-7..

Comment TO3-2

The comment claims that BCHD does not have the legal authority to operate residential facilities. The comment claims, regardless of presumed need, permitted uses on special healthcare district are limited to a defined use and cites Health and Safety Code Division 23 Hospital Districts §§32000–32492 of the California Healthcare Code. The comment also asserts that non-permitted land uses would not be acceptable through leasing land and working with a partner as an investor or operator. The comment claims Health and Safety Code §1250, which has to do with State licensing requirements and §15432, which has to do with eligibility for State financial assistance, omits language that would designate senior care services and assisted living facilities as permitted uses of a healthcare district. The comment claims BCHD would require approval from its Local Area Formation Commission to establish a residential facility.

These comments do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, for decades, BCHD has utilized public/private partnerships – including a partnership with the Silverado Beach Cities Memory Care Community – to generate revenue for the purpose of providing a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. Implementation of the proposed Project would not substantially alter these land uses. The proposed Project would continue this model to reinvest revenue into community health and wellness programs and services. As provided in Health and Safety Code §32121(j), under State law, healthcare districts are empowered “*[t]o establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services, including, but not limited to, outpatient programs, services, and facilities; retirement programs, services, and facilities; chemical dependency programs, services, and facilities; or other health care programs, services, and facilities and activities at any location within or without the district for the benefit of the district and the people served by the district.*” It should also be noted that at least one other California Health District – the Salinas Valley Memorial Hospital District – also operates 72 assisted living beds (see the Salina Valley Memorial Hospital District website here: <https://www.svmh.com/about-us/affiliates-partnerships/>).

Additionally, all elements of the proposed Healthy Living Campus Master Plan would comply with local zoning regulations. Consistency with the City of Redondo Beach and City of Torrance General Plans is discussed in detail in Section 3.10, *Land Use and Planning* under Tables 3.10-3 and 3.10-5.

Comment TO3-3

The comment summarizes that the purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project. The comment includes excerpts from EIR findings and states the EIR does not provide quantified analysis of impacts to aesthetic and visual resources. The comment then provides estimated values for apparent size increase, stating the proposed structures would appear 66 to 173 percent taller than existing structures and provides a description of how apparent size might be calculated. The comment notes that the EIR does not provide quantitative data on apparent size. The comment suggests the EIR could have provided analysis on apparent size and additional renderings that depict view impacts from closer the property lines of the Project site. The comment describes how moving closer to an object increases its apparent size. The comment suggests the heights of the building proposed under the proposed Project are not compatible with adjacent land uses. The comment asserts that the EIR does not provide evidence of visual compatibility. The comment concludes by suggesting the EIR requires a complete analysis to aesthetic and visual impacts, including how size changes will appear off-site, before adoption.

First, contrary to the assertion that the EIR provides no evidence to support the findings of the aesthetics and visual resources analysis, it should be noted that the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. The methodology for the preparation of the computer-generated photosimulations is clearly described and replicable. As described in Section 3.1.1, *Methodology*, “[e]ach representative view was photographed to establish the existing visual condition from the selected public location. Photosimulations of the Phase 1 preliminary site development plan 3D model were prepared from each representative view to provide a ‘before and after’ representation for analysis. The representative analysis focuses on changes from existing conditions as they would be experienced by motorists, bicyclists, and pedestrians from the public realm. The base photography and photosimulations at each representative viewing location were independently prepared by VIZf/x. VIZf/x used a Nikon d7100 camera with a 35-millimeter lens giving the closest approximation to the human eye. The source image is comprised of between 8 and 10 vertical renderings captured from a tripod and stitched together to create the source base image. Each rendering is 25 percent of what the actual 35-millimeter lens captures, which minimizes any curvature to the architecture and reduces distortion.”

The comment provides estimates of the apparent size of the structures using visual angles from various viewing locations. In short, the analysis and examples provided in the comment demonstrate that as one gets closer to an object, that object appears bigger. It should be noted that the representative views, which were identified with input from the City of Redondo Beach, generally encircle the BCHD campus (refer to Figure 3.1-1). Representative View 2, 3, and 5 in particular provide views of Project site from a distance of less than 100 feet, which are uninterrupted by intervening structures. Given the adjacency of the representative views of the Project site, there is no substantial evidence supporting the commenter's assertion the height of proposed development is underrepresented in the analysis, even if the EIR does not provide an analysis of visual angles.

Most importantly, while the comment provides an analysis of visual angles, it does not consider the existing setting or intervening structures, and most importantly does not appropriately compare these calculations to any threshold.

Thresholds of significance may be defined either as quantitative or qualitative standards, or sets of criteria, whichever is most applicable to each specific type of environmental impact. For example, quantitative criteria are often applied to air quality, noise, and transportation impacts, while aesthetics and land use are typically evaluated using qualitative thresholds. Appendix G of the CEQA Guidelines states that proposed Project may have a significant adverse impact on aesthetics if:

- a) The project would have a substantial adverse effect on a scenic vista;
- b) The project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway;
- c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?; and/or
- d) The project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

As described more fully in Master Response 9 – Aesthetics and Visual Resources Analysis, given the location of the Project site in an urbanized area, impacts associated with visual character are described in the context of applicable zoning regulations for P-CF (Community Facility) and C-2 (Commercial). As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project

would comply with the required building height prescribed in Redondo Beach Municipal Code (RBMC) Section 10-2.622, and would not conflict with any City of Redondo Beach policies or development standards. The discussion under Impact VIS-2 compares the proposed Project to the applicable policies of the Redondo Beach General Plan Land Use Element and Parks and Recreation Element as well as the Residential Design Guidelines for Multi-Family Residential in Table 3.1-2. While the design guidelines only apply to buildings and structures in the R-2, R-3, R-3A, RMD, RH-1, RH-2, and RH-3 multiple-family residential zones, they have been conservatively applied to the 217 Assisted Living units and Memory Care units proposed for the RCFE Building. As shown in Table 3.1-2, the proposed Project would be consistent with City-wide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. Aside from the subjective contention that the proposed RCFE Building would be out of place the comment does not contest the consistency of the proposed Project with these policies, which are used as the threshold for impacts to visual character in an urban setting (refer to Section 3.1.3, *Impact Assessment and Methodology*).

With regard to the requested analysis of additional renderings of views, CEQA Guidelines Section 15204 clearly states: “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.*” As previously described, the six representative views offer a range of public views from public streets, sidewalks, and recreational resources within the vicinity of the Project site. Therefore, the representative views identified and utilized in the analysis of this EIR are considered adequate to inform the analysis of impacts to aesthetics and visual resources consistent with the CEQA Guidelines, and inclusion or consideration of additional representative views is not necessary.

Comment TO3-4

The comment incorrectly states that under CEQA, lead agencies must consider how shading and shadows will affect sensitive receptors. As described in the response to Comment TRAO-131, the CEQA Guidelines do not specifically mention the terms “*shade*” or “*shadow*.” Shade and shadows are typically only analyzed in an EIR when the lead agency, pursuant to CEQA Guidelines 15064.7(b), adopts methodologies and thresholds for assessing such an impact.

The comment goes on to claim that the EIR and associated shade and shadow analysis (see Appendix M) provide limited analysis of shade and shadow effects. The comment claims that the analysis does not provide adequate thresholds for analyzing shade and shadow effects due to

BCHD's lack of experience as a lead agency. The comment states that the EIR does not describe that BCHD has not adopted shade and shadow guidelines or *City of Los Angeles CEQA Thresholds Guide (2006)*. The comment states BCHD has not determined that these guidelines are appropriate to apply to BCHD owned property. The comment states lead agencies may not arbitrarily establish thresholds to avoid significant impacts and any applied threshold must be backed by substantial evidence. As described in the response to Comment TO1-1, the CEQA Guidelines do not provide thresholds with respect to shade and shadow impacts. Additionally, neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. The *City of Los Angeles CEQA Thresholds (2006)* were identified as appropriate thresholds for analysis because they identify clear, unambiguous definitions of sensitive receptors as well as quantitative standards for when shade and shadows would affect such sensitive receptors. It should be noted that this approach is not unique and has been used by a wide number of local jurisdictions within Los Angeles County – including both coastal and inland areas – that do not have their own quantitative significance thresholds for shade/shadow impacts (e.g., City of Santa Monica, City of Long Beach, Culver City, etc.).

The comment incorrectly suggests the shade and shadow model did not factor in topographical features. As described in Section 3.1, *Aesthetics and Visual Resources*, a shade and shadow study was prepared by Paul Murdoch Architects, in coordination with the EIR preparers, “to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M).” Specifically, the Project site was modeled using the survey provided by DENN Engineers while the surrounding neighborhood was generated using data from the OpenStreetMap library. These two sources provided the most accurate representation of the site while capturing the wider context to depict how the proposed construction would affect the surrounding neighborhood. The shade and shadow studies were generated in Autodesk Revit 2020 sun lighting utilizing geo coordinates for accuracy. Refer to Master Response 9 – Aesthetics and Visual Resource Analysis for a detailed discussion and response to comments pertaining to the shade and shadow study.

Comment TO3-5

The comment states the EIR's vehicle miles traveled (VMT) analysis is flawed because the analysis assumes vehicle trips will be eliminated with the demolition of the 514 Building rather than be displaced. The comment asserts that removing an existing facility would not eliminate all associated travel but would rather displace travel and may even increase VMT.

As described in Section 3.14, *Transportation* as well as Appendix K, the assumptions used to estimate VMT were prepared in accordance with CEQA Guidelines Section 15064.3. The scope

and methodology of the analysis was determined in consultation with the City of Redondo Beach and the City of Torrance. The VMT study complies with the impact analysis guidelines as detailed in the Governor's Office of Planning and Research's (OPR) Technical Advisory. Per OPR recommendation, the VMT study reported VMT be reported as "Home-Based VMT" per capita for residential projects and "Home-Based Work VMT" per employee for the employees of a project site. Home-Based VMT includes all vehicle roundtrips originating from the residence of the trip-maker. Home-Based Work VMT includes only vehicle roundtrips between the residence of the trip-maker and their place of work. Average VMT per capita and per employee determined for the South Bay Cities Council of Governments region, and therefore adequate for the purposes of evaluation of the proposed Project.

Comment TO3-6

The comment claims the EIR fails to provide meaningful analysis of the proposed PACE program, including the size of the program, estimated number of participants, and fit with the proposed Healthy Living Campus. The comment states that without estimated number of PACE participants, potential traffic impacts, including impacts to nearby elementary school children cannot be reasonably analyzed. The comment notes lack of specifications regarding operation of PACE transportation services and expresses doubt regarding the financial viability of the proposed PACE program.

The description of the PACE program is discussed in Section 2.5.1.1, *Proposed Uses*, which describes "*PACE services would be primarily provided on-site at adult day health center, which would include an interdisciplinary team of health professionals (e.g., primary care providers, registered nurses, dietitians, physical therapists, occupational therapists, recreation therapist, home care coordinator, personal care attendant, driver, etc.) coordinating preventive, primary, acute, and long-term care services. PACE services would include meals, nutritional counseling, dentistry, primary care (including doctor and nursing services), laboratory/X-ray services, emergency services, hospital care, occupational therapy, recreational therapy, physical therapy, prescription drugs, social services, social work counseling, and transportation.*"

The methodology for calculating trip generation is clearly described in Section 3.14.3, *Impact Assessment and Methodology*. The proposed Project's generation of daily vehicle trips was estimated to evaluate whether the Project meets the criteria for the small project screening. Trip Generation, 10th Edition (Institute of Transportation Engineers [ITE] 2017) represents the industry standard for estimating trip generation and is based on a compilation of empirical (i.e., observed) trip generation surveys at locations throughout the country. While ITE Trip Generation is a defensible approach, ITE always recommends utilizing local data where it is available. Based on

input from the City of Redondo Beach and the City of Torrance, an empirical trip generation study was conducted at the BCHD campus to validate and calibrate ITE trip generation rates to reflect accurate existing site conditions.

Using the empirical driveway and pedestrian counts, Fehr & Peers calibrated the ITE trip generation rates in order to more accurately reflect existing trip generation at the BCHD campus. The calibrated trip rates were used to estimate projected trip generation for the proposed Project by phase.

As described in Section 2.5.1.1, *Proposed Uses*, there would be employees who would likely drive to the BCHD campus, similar to the existing Community Service employees. However, this program would implement a drop-off and/or van transportation model, with participants coming in the morning and staying throughout the day. PACE would likely require one or two vans, which may also be shared by the Assisted Living program and Memory Care community. PACE would also make use of Los Angeles County Access and/or WAVE shuttles (to the extent that they are available to residents of the City of Redondo Beach and the City of Hermosa) to provide transportation for participants. For these reasons, trip generation for the PACE program was estimated using the calibrated general office rate for the BCHD campus, which is 14.7 percent greater than the ITE trip generation rate for this land use type. The total square footage of the PACE program was multiplied by the calibrated trip generation rate to determine the total number of daily trips (see Appendix K, which clearly presents the trip generation for Phase 1 and Phase 2 of the proposed Project).

As described in the Evaluation of Development Strategy: Executive Summary, which is publicly available on the BCHD website here: https://bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf, it is estimated that the PACE program would have 200 daily users. Even with the assumption that a van could hold 10 persons per trip, this would result in a total number of 40 daily round trips. The transportation study prepared by Fehr & Peers conservatively estimates 226 daily trips for the PACE program.

It should also be noted that the proposed Project would implement a Transportation Demand Management (TDM) Plan consistent with Redondo Beach Municipal Code (RBMC) Section 10-2.2406. The alternative transportation and active transportation (e.g., walking, biking, etc.) strategies provided in Mitigation Measure (MM) T-1, which would further reduce Project-related VMT,

Issues related to the financial viability of the PACE program do not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. While

the California Environmental Quality Act (CEQA) states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to “...*supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124).

Comment TO3-7

The comment claims, without substantial evidence there is no need for the proposed Project and suggests that there is not a market for BCHD to generate revenue or continue offering programs. The comment expresses concern that the proposed Project would fail financially, would not be able to generate target revenues, and would not be beneficial to the community. Refer to Master Response 3 – Project Need and Benefit, Master Response 4 – Project Objectives, and Master Response 6 – Financial Feasibility/Assurance for detailed a discussion and response to comments pertaining to these issues.

As described in the comment, if the BCHD Board of Directors adopts the proposed Project or one of the alternatives with one or more significant and unavoidable effects, BCHD shall “...*state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record*” (CEQA Guidelines Section 15093[b]). This Statement of Overriding Considerations would further describe and enumerate the benefits of the approved project.

Letter TO4

June 10, 2021
Tim Ozenne

Comment TO4-1

The comment claims the Environmental Impact Report (EIR) is deficient and fails to establish that Beach Cities Health District (BCHD), as a special district, has legal authority to establish the proposed Assisted Living program under its special district powers. Refer to the response to Comment TO3-2.

Letter WC

May 1, 2021
Warren Croft
509 North Prospect
Redondo Beach, CA 90277

Comment WC-1

The comment expresses general opposition to the proposed Project, stating concerns with air quality and noise impacts. The comment claims, without substantial evidence or expert opinion, that the impacts associated with Phase 1 are underestimated. However, contrary to the commenter's assertion, the EIR rigorously adheres to the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.). The claim that impacts are underestimated is unfounded and unsupported by substantial evidence. Refer to Master Response 10 – Air Quality Analysis and Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to these issues.

Comment WC-2

The comment states Phases 2 of the proposed Project is unstable and that associated mitigation measures are unclear and lack detail. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to the programmatic analysis of Phase 2.

The claim that mitigation measures are unclear is also unfounded and unsupported by substantial evidence. The EIR clearly complies with CEQA Guidelines Section 15126.4, “...where potentially significant adverse environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts must also be identified and implemented.” CEQA also requires that implementation of adopted mitigation measures or any revisions made to the project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” A Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified in Table 11-1.

Comment WC-3

The comment states implementation of the proposed Project would increase construction-related traffic, including heavy haul construction vehicles and trips in the area. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.14, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction-related activities within their respective jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

Comment WC-4

The comment expresses doubt that implementation of the proposed Project would resolve existing off-site parking issues. The comment also suggests the proposed Project would exacerbate existing off-site parking issues. While no longer a CEQA issue, it should be noted that BCHD carefully determined the appropriate number of parking spaces for the development proposed in Phase 1 and Phase 2 based on a shared parking study prepared by Fehr & Peers. The shared parking study was instrumental in ensuring that there would be adequate parking supply on-site in order to avoid spill over into the surrounding residential community. As described in Section 1.5, *Required Approvals*, BCHD would pursue approval from the Redondo Beach Building & Safety Division for shared parking pursuant to Redondo Beach Municipal Code (RBMC) Section 10-1.1706. Refer to the response to Comment EG-3. The claim that the proposed Project would result in off-site parking impacts is unfounded and unsupported by substantial evidence.

Comment WC-5

The comment expresses general concerns that construction-related noise cannot be mitigated and would affect nearby residents for the duration of the construction period. Construction-related noise impacts are described in detail within Section 3.11, *Noise* under Impact NOI-1. Refer to Table 3.11-16 and Table 3.11-17 for a complete list of sensitive receptors that would be affected by construction-related noise during Phase 1 and Phase 2 of the proposed Project. Refer also to Master Response 12 – Noise Analysis for detailed discussion and response to comments pertaining to this issue.

Letter TC

April 17, 2021
Tiya Choi

Comment TC-1

This comment expresses general opposition to the proposed Project citing debris, noise, traffic jams, and obstruction of views. However, the comment does not challenge any of the analysis provided in the Environmental Impact Report (EIR) or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter VM

April 17, 2021
Virginia Minami

Comment VM-1

The comment suggests that the Environmental Impact Report (EIR) should consider other sites for development including the Southbay Galleria, which the comment asserts is currently declining. As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, alternate sites for the relocation of existing Beach Cities Health District (BCHD) uses and the development of proposed services and facilities were considered. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site (i.e., 9.78 acres or greater, Public or Institutional land use designation, P-CF zoning) to support the uses associated proposed Health Living Campus Master Plan. While the South Bay Galleria is located in Redondo Beach and surpasses the acreage requirement, the South Bay Galleria Site is

zoned as CR (Regional Commercial Zone). BCHD could apply for a zoning change; pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote. Additionally, in January 2019 the Redondo Beach City Council voted unanimously to remodel the existing mall, which features nearly 1 million square feet (sf) of rentable space. Development at alternate sites within the Beach Cities may also be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project, including impacts related to aesthetics, criteria pollutant and greenhouse gas (GHG) emissions, geology and soils, hazardous materials, noise, and transportation. Additionally, the South Bay Galleria, like all other potential alternate sites described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis*, are not under ownership or management of BCHD, and it may be economically infeasible for BCHD to purchase a new site for the proposed development. Therefore, the South Bay Galleria as an alternative location would not to be feasible for development of the proposed BCHD Healthy Living Campus Master Plan.

Letter WBJYJL

June 7, 2021
Wei Yu
Joyce Li
Jonathan Yu
Brianna Yu
19922 Tomlee Ave
Torrance, CA 90503

Comment WBJYJL-1

The comment expresses general opposition the proposed Project citing concerns about safety and a disruption to a peaceful living style. However, the comment does not challenge any of the analysis provided in the Environmental Impact Report (EIR) or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter WVS

May 24, 2021
William & Vivian Shanney

Comment WVS-1

The comment claims that the Environmental Impact Report (EIR) is both biased, while also identifying significant impacts to surrounding neighborhoods. The claims of bias are addressed in the responses to WVS-2 and WVS-3. The comment correctly describes that a significant and unavoidable impact has been identified. However, it should be clarified that the EIR identifies one significant and unavoidable noise impact (refer to Impact NOI-1) that would occur for the duration of construction of both phases of the proposed Project, all other resource areas assessed in the EIR determined that impacts would either be less than significant or less than significant with mitigation measures.

Comment WVS-2

The comment claims that the selected representative views misrepresent the size of the proposed Project. To fully and accurately assess impacts associated to aesthetic and visual resources, a total of six views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and other public gathering places (e.g., Dominguez Park) in the Project vicinity. These six representative views encircle the campus and provide west, southwest, south, and northeast facing views of the Project site. These views were identified with input from the City of Redondo Beach and offer a range of public views from different areas of the surrounding neighborhoods and include views of various elements of the proposed Project, such as the proposed Residential Care for the Elderly (RCFE) Building, ornamental landscaping, and the steep grade and retaining wall located on the Project site's eastern border.

For example, Representative View 1, located on Tomlee Avenue west of its intersection with Mildred Avenue, was selected to represent views of the Project site from the residential neighborhood within Torrance adjacent to the east of the Project site. Likewise, Representative View 2 was selected because it represents the view of the steep grade, retaining walls, and landscaped vegetation along the eastern border of the Project site, which is visible to motorists, bicycles, and pedestrians exiting the neighborhood onto Flagler Lane and Beryl Street.

The photosimulations from the six Representative Views presented in the EIR were prepared utilizing photographs which depict existing development (i.e., houses, streetlights, etc.), thereby allowing for clear comparison of proposed structures with the scale of existing development. Additionally, the size of proposed development is also described through numerical values including feet and stories for height and square feet for spatial footprint throughout the EIR. As such, the representative views and subsequent analysis included in the EIR are not biased and provide a sufficient depiction of proposed development. Refer to Master Response 9 – Aesthetics

and Visual Resources Analysis for further a detailed discussion and response to comments for issues pertaining to aesthetics and visual resources.

Comment WVS-3

The comment asserts that the proposed Project would have unmitigable impacts related to dust emissions and noise during construction. As described in the response to Comment WVS-1 the EIR does acknowledge significant and unavoidable impacts associated with construction-related noise. These impacts would be mitigated to the maximum extent feasible through the implement of MM NOI-1; however, this temporary, but prolonged impact would remain significant and unavoidable. The comment misrepresents potential impacts associated with air quality. As described in Section 3.2, *Air Quality* under Impact AQ-2, the proposed Project would include mitigation measures that would reduce criteria pollutant and toxic air contaminant (TAC) emissions. As described in to levels below the thresholds established by the South Coast Air Quality Management District (SCAQMD). With the implementation of the required mitigation, impacts would be less than significant.

The comment does not challenge any specific aspects of the analysis presented in Section 3.11, *Noise* or Section 3.2, *Air Quality*. Additionally, this comment does not provide any substantiating evidence to further support its assertions.

Letter WS

Comment WS-1

The comment expresses general opposition to the Project, citing the high cost of the proposed Assisted Living and Memory Care units that would be developed as a part of the Residential Care for the Elderly (RCFE) Building. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. Refer also to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units.

Comment WS-2

The comment expresses concern regarding the duration of the construction period and related, noise, traffic, air quality and hazardous emissions. These concerns that have been raised by the comment are thoroughly addressed in the EIR (refer to Section 3.11, *Noise*, Section 3.14, *Transportation*, Section 3.2, *Air Quality*, and Section 3.8, *Hazards and Hazardous Materials*). In

fact, significant and unavoidable impacts are identified for noise under Impact NOI-1. The comment does not challenge any of these analyses or provide any substantiating evidence to further support or clarify the concerns that have been raised.

The comment also expresses specific concerns that Towne Avenue Elementary School may be adversely affected by hazardous emissions. However, Towne Avenue Elementary School is located over 6 miles from the Project site and is separated by several residential neighborhoods, manufacturing districts, and regional transportation corridors, including Interstate [I-] 110 and I-405 as well as State Route [SR] 107 and SR-213. The distance between the Towne Avenue Elementary School and Project site is great enough that potential impacts to air quality and noise would be negligible.

Comment WS-3

The comment suggests the existing Silverado Beach Cities Memory Care Community currently meets the need for assisted living facilities and reiterates opposition to the Project. It should be noted that the Silverado Beach Cities Memory Care Community provides specific memory care services. While this use would be retained under the proposed Healthy Living Campus Master Plan, additional new services (e.g., Assisted Living, Programmatic All-Inclusive Care for the Elderly [PACE], etc.) would also be developed under the proposed Project. Refer to Master Response 3 – Project Need and Benefit for a detailed discussion and response to comments on issues pertaining to the need for an Assisted Living program in the region.

Comment WS-4

Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Letter WK

June 9, 2021
William Kelley
510 Harkness Lane
Redondo Beach CA 90278

Comment WK-1

The comment expresses general concerns regarding the size and scope of the proposed Project, and potential impacts related to traffic, noise, air quality, overcrowding, and compatibility of the

proposed development with the character of the surrounding neighborhood. However, the comment does not challenge any of the analysis provided in the Environmental Impact Report (EIR) or provide any substantiating evidence to further support or clarify the concerns that have been raised. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Comment WK-2

The comment asserts that the streets surrounding the campus are already congested and that additional construction-related traffic would exacerbate this issue. However, the comment does not challenge any specific aspects of the impact analysis in Section 3.12, *Transportation* or provide any substantiating evidence to further support or clarify its concerns. Further the comment fails to acknowledge that Mitigation Measure (MM) T-2 would require preparation of a Construction Traffic and Access Management Plan to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The Construction Traffic and Access Management Plan would require construction flaggers be present during all haul trips and concrete truck trips to maintain the flow of traffic and allow safe passage for pedestrians across crosswalks and crossing the driveway entrances along North Prospect Avenue and Beryl Street. The Construction Traffic and Access Management Plan would include a Construction Traffic Control Plan to be approved by the City of Redondo Beach and the City of Torrance for construction activities within their respect jurisdictions. The Construction Traffic Control Plan would outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction in accordance with the *L.A. County – Department of Transportation Area Traffic Control Handbooks*. Refer to Master Response 13 – Transportation Analysis for further a detailed discussion and response to issues associated with construction-related traffic.

Comment WK-3

The comment suggests that the proposed programming and services that would be developed under the Healthy Living Campus Master Plan should be distributed across multiple, smaller sites, rather than being co-located within the existing campus. This suggestion contains some similarities to Alternative 5, which would relocate the Center for Health and Fitness (CHF) permanently, allowing for a reduced sized parking structure during the construction of Phase 2. However, the majority of the uses associated with the proposed Project have a close relationship to one another. For example, residents within the Assisted Living units and Memory Care units would also be

expected to use the Program of All-Inclusive Care for the Elderly (PACE) and other services programmed for the proposed RCFE Building in Phase 1 as well as the programming and services included in Phase 2. Further, this approach would not provide the amount of programmable and publicly accessible open space included in the proposed Project. As such, this alternative would not meet the following project objectives:

- Provide sufficient public open space to accommodate programs that meet community health needs.
- Address the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces.
- Redevelop the Project site to create a modern campus with public open space and facilities designed to meet the future health needs of residents, with meeting spaces for public gatherings and interactive education.

Any alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site to support the uses associated proposed Health Living Campus Master Plan. If found, development at alternate sites within the Beach Cities may still be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project, including impacts related to aesthetics, criteria pollutant and greenhouse gas (GHG) emissions, geology and soils, hazardous materials, noise, and transportation.

Comment WK-4

The comment requests adherence to General Policy Plan Article 1.46.4. This may be a reference to Policy 1.46.4 of the Redondo Beach General Plan Land Use Element which requires the city to “...establish standards for the City and coordinate with other public agencies to ensure that public buildings and sites are designed to be compatible in scale, mass, character, and architecture with the existing buildings and pertinent design characteristics prescribed by this Plan for the district or neighborhood in which they are located.” As described in 3.10, *Land Use and Planning*, implementation of the proposed Project would be consistent with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The comment does not challenge any specific aspects of this policy consistency analysis and does not provide any substantiating evidence to demonstrated any such conflict with General Policy Plan Article 1.46.4.

8.3.7 Oral Comments

8.3.7.1 Wednesday, March 24, 2021

Melanie Cohan

Oral Comment MC-1

The comment expresses general opposition to the proposed Project. Refer to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Oral Comment MC-2

The comment requests a study to show the need for the proposed Assisted Living program and asks who will be able to afford the proposed Assisted Living Units. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units for a detailed discussion and response to comments pertaining to these issues. As described therein, the matter of the need for the proposed Project and its relative benefits has been subject to multiple technical reports – including three market studies and a peer review of these market studies. Additionally, this need for the proposed Project has been discussed in detail at numerous well-noticed public hearings.

Oral Comment MC-3

The comment raises the issues of the previously abandoned and plugged oil and gas well as well as hazardous building materials. Each of these issues is addressed in detail in Section 3.8, *Hazardous and Hazardous Materials*, with analysis supported by Phase I and Phase II Environmental Site Assessment (ESAs) as well as follow-up investigations to identify the precise location of the abandoned and plugged oil and gas well.

As described in Master Response 11 – Hazards and Hazardous Materials Analysis, Terra-Petra Environmental Engineering (Terra-Petra) conducted a geophysical survey of the Project site and excavated the site until the well was encountered to determine its exact location. Terra-Petra also completed a leak test, which was negative (i.e., no leaks were detected). Pursuant to Mitigation Measure (MM) HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and

avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet.

With regard to potential hazardous building materials, based on the age of existing structures, building materials may contain asbestos-containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs). Improper attempts to remove ACM can release asbestos fibers into the air. However, as required by MM HAZ-1, surveys for ACM, LBP, and PCBs would be conducted by a licensed contractor(s) prior to and during the demolition activities. If such hazardous materials are found to be present, the licensed contractor(s) shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and mold to ensure public safety, such as sealing off an area with plastic and filtering the affected air to ensure that no asbestos fibers are let out into the surrounding environment. Therefore, implementation of mitigation measure MM HAZ-1 and compliance with existing mandatory regulations and abatement procedures for the treatment, handling, and disposal of ACM, LBP, PCBs and mold, would ensure that impacts associated with the proposed Project would not release hazardous materials into the environment or create a hazard to the public, including nearby residences and schools.

Oral Comment MC-4

The comment states that there is only a brief explanation of Phase 1 and Phase 2 of the proposed Project presented in the videos on the BCHD website. It should be noted that these are short videos that summarize the nearly 60-page Project Description, which meets all requirements of CEQA Guidelines Section 15124.

Craig Cadwallader

Oral Comment CC-1

The comment describes the commenter's opinion that the Environmental Impact Report (EIR) was well done in scope and depth and it covered all the concerns that are appropriate in a Draft EIR. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers.

Susan Yano

Oral Comment SYI-1

The comment asks whether the EIR is supposed to address the financial impacts of the proposed Project. As described in Master Response 6 – Financial Feasibility/Assurances, while CEQA states that an EIR should provide a description of the project, including a “...*general description of the project’s technical, economic, and environmental characteristics,*” the lead agency is not required to do so if the information “...*does not supply extensive detail beyond that needed for evaluation and review of the environmental impact*” (CEQA Guidelines Section 15124). The understanding and interpretation that CEQA does not require an EIR to discuss the economic feasibility or the financial details of a project, because CEQA is an informational document about the physical environmental effects of a project, has been reaffirmed by the courts (*Sierra Club v. County of Napa* [2004] 121 Cal. App. 4th 1490, 1503).

Oral Comment SYI-2

The comment asks what would happen in the result of a budget overrun. Refer to Master Response 6 – Financial Feasibility/Assurances for a detailed discussion and response to comments pertaining to this issue.

Oral Comment SYI-3

The comment asks are the uncertainties in the future health and wellness programming needs and findings. Refer to Master Response 6 – Financial Feasibility/Assurances as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to these issues.

The comment goes on to question why the proposed Residential Care for the Elderly (RCFE) Building is larger than the Wellness Center, Aquatic Center, and Center for Health and Fitness. Although these comments do not address the adequacy of the EIR, as discussed below, they have been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Project.

Oral Comment SYI-4

The comment expresses disbelief that with the exception of noise, the EIR identifies impacts that would be less than significant or less than significant with mitigation. The commenter asserts that the previously plugged and abandoned oil well and contaminated soils have not been addressed.

However, contrary to this assertion, these issues have been addressed in detail in Section 3.8, *Hazards and Hazardous Materials*, with analysis supported by Phase I and Phase II Environmental Site Assessments (ESAs) as well as various follow-up investigations, including excavation of the previously plugged and abandoned oil and gas well to identify its precise location. Refer to Master Response 11 – Hazards and Hazardous Materials Analysis.

Oral Comment SYI-5

The comment expressing concern about the management of the construction program and states as an example that BCHD has not accurately located the fence on the vacant Flagler Lot. The commenter asserts that the fence is located on City of Torrance property. This comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Fred

Oral Comment F-1

The comment asks if any other location has been considered for the proposed Project. It should be noted that the Environmental Impact Report (EIR) does consider alternate locations. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities. As further described in the EIR, none of the potential alternate sites within the Beach Cities are under the ownership or management of the Beach Cities Health District (BCHD), and it would be economically infeasible for BCHD to purchase a new site for the proposed development.

Oral Comment F-2

The comment suggests, without substantial evidence, that the EIR is faulty because it takes nothing into consideration. However, contrary to the commenter's assertion, the EIR rigorously adheres to

the standards for adequacy set out in California Environmental Quality Act (CEQA) Guidelines Section 15151, providing nearly 1,000 pages of comprehensive environmental analysis supported by technical studies and quantitative investigation (e.g., photosimulations, quantitative air quality and noise analyses, transportation studies, human health risk assessment [HRA], etc.).

Oral Comment F-3

The comment states, without substantial evidence, that the noise mitigation measures are insufficient. However, the comment fails to acknowledge the considerable discussion regarding the feasibility of the measures included in Mitigation Measure (MM) NOI-1. Impact NOI-1 clearly identifies discusses issues related to the feasibility. As described therein:

“[t]he feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership...For Phase 1 and Phase 2 construction, the necessary noise barrier heights (i.e., up to 105 feet) at the edge of the BCHD development footprint are too great to allow only one- to three-sided barriers and the total building footprint is too large to construct a fully enclosed four-sided noise barrier. Further, the construction of the foundation and framing structure required to support a fully enclosed four-sided noise barrier would result in significant and unavoidable noise impacts to adjacent residential areas in Redondo Beach and West Torrance.

A shorter noise barrier could be constructed at the edge of the sensitive receptors in West Torrance (and similarly in Redondo Beach). However, any such off-site construction of a noise barrier would require approval from the City of Torrance and/or the City of Redondo Beach, which cannot be assured. Additionally, while the construction of a 30-foot-tall noise barrier may be feasible along Flagler Lane and Flagler Alley, a 30-foot noise barrier along Beryl Street and North Prospect Avenue fronting residences may not be feasible.”

8.3.7.2 Tuesday, April 13, 2021

Mark Nelson

Oral Comment MNI-1

This comment suggests a context to review the Draft Environmental Impact Report (EIR), providing an example of a previous vote the fund the South Bay Hospital. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to

comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Oral Comment MNI-2

This comment claims that a big data analysis was used to analyze the scoping comments, which the commenter asserts were most heavily weighted toward building height than construction duration or actual size. The comment goes on to claim that the scoping comments related to building height were ignored. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis. Not only were the scoping comments not ignored, the Beach Cities Health District (BCHD) interrupted the preparation of the California Environmental Quality Act (CEQA) to revise the proposed Project in an effort to limit building frontage along the eastern boarder of the BCHD campus.

Potential impacts to scenic vistas are described under Impact VIS-1 and the potential impacts to visual character are described under Impact VIS-2. The impact to scenic views, would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane. Mitigation Measure (MM) VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas.

Oral Comment MNI-3

The comment states the intersection of West 190th Street & Prospect is the highpoint, not the intersection of West 190th Street & Flagler lane is not the highpoint. The comment goes on to request a visual analysis from this location. With regard to maximum elevation views along West 190th Street, as described in Impact VIS-1, it should be noted that Representative View 6 was selected because it provides a clear, uninterrupted view of the Palos Verdes ridgeline. While there are intersections along West 190th Street that provide slightly elevated views – including the intersection of Prospect & West 190th Street, which is located at an elevation that is approximately 6 feet higher than the elevation at Representative View 6 – these intersections do not provide clear uninterrupted views of this scenic resource. With regard to the requested analysis of additional representative views, California Environmental Quality Act (CEQA) Guidelines Section 15204

clearly states: “*CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.*”

Oral Comment MNI-4

The comment states that BCHD should propose noise barriers that are at least as tall as those used during the construction of the Legado Redondo development. The commenter asserts, without substantial evidence, that these noise barriers were greater than 30 feet in height. However, the comment does not acknowledge or contest the discussion of feasibility provided under Impact NOI-1, which describes:

“[t]he feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership...For Phase 1 and Phase 2 construction, the necessary noise barrier heights (i.e., up to 105 feet) at the edge of the BCHD development footprint are too great to allow only one- to three-sided barriers and the total building footprint is too large to construct a fully enclosed four-sided noise barrier. Further, the construction of the foundation and framing structure required to support a fully enclosed four-sided noise barrier would result in significant and unavoidable noise impacts to adjacent residential areas in Redondo Beach and West Torrance.

A shorter noise barrier could be constructed at the edge of the sensitive receptors in West Torrance (and similarly in Redondo Beach). However, any such off-site construction of a noise barrier would require approval from the City of Torrance and/or the City of Redondo Beach, which cannot be assured. Additionally, while the construction of a 30-foot-tall noise barrier may be feasible along Flagler Lane and Flagler Alley, a 30-foot noise barrier along Beryl Street and North Prospect Avenue fronting residences may not be feasible.

Oral Comment MNI-5

The comment states that the project objective related to seismic safety is invalid because there is no legal obligation for the demolition of the Beach Cities Health Center. However, it should be noted that BCHD has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of

Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Oral Comment MNI-6

The comment asserts, without substantial evidence, that the proposed Project would have a significant negative impact on aesthetics. The comment claims, without substantial evidence (e.g., calculations), the average height of the proposed development would be approximately three times greater than the existing Beach Cities Health Center. The comment claims that the City of Redondo Beach uses average height to determine aesthetics and visual impacts; however, the EIR for the Kensington Assisted Living Facility (State Clearinghouse [SCH] No. 2013121065) as well as the EIR for The Waterfront (SCH No. 2014061071) review the maximum building height in the context of consistency with the Redondo Beach Municipal Code (RBMC). The analysis of visual character provided in Impact VIS-2 is consistent with this approach.

Geoff Gilbert

Oral Comment GG-1

The comment states that Phase 1 would include the removal of landscaped trees along Diamond Street to provide space for the Southern California Edison (SCE) Substation Yard. The comment asserts that this would significantly reduce or eliminate the greenspace buffer zone.

Potential locations for the proposed substation and electrical yard are limited to areas where: the substation could be installed early in the project timeline (i.e., outside of active construction zones); the substation would be readily accessible by truck for SCE service and maintenance activities during all phases of project construction and operation; and existing utility connections are present. As such, location of the new substation yard, generator yard, and gas valve enclosure is limited to the southeastern hillside of the Project site. However, the electrical substation would be surrounded by a perimeter wall and screened by proposed landscaping, establishing a new buffer between the proposed substation yard and the adjacent residents. The proposed SCE Substation Yard would only be visible from Flagler Alley and limited segments of Diamond Street. Views of the proposed SCE Substantial Yard would be block from other locations by intervening structures and/or landscape. As such, this element of the proposed Project would not have a significant adverse impact of aesthetics and visual resources.

Oral Comment GG-2

The comment asserts that removal of the greenspace buffer would affect air quality by eliminating the natural filtration and screening barrier. It should be noted that issues related to operational air quality are discussed in detail in Section 3.2, *Air Quality*, which is supported by exhaustive quantitative modeling prepared by iLanco, a firm with decades of experience quantifying air emissions and addressing potential effects on human health for projects in urban settings within the Greater Los Angeles Area. It should be noted that operational impacts associated with the proposed Project would be less than significant. Additionally, the proposed landscape would continue to provide a screening barrier between the proposed SCE Substation Yard and surrounding development.

Oral Comment GG-3

The comment asserts that the operational noise of the proposed SCE Substation Yard was not considered. Refer to Master Comment Response – Noise Analysis for a detailed discussion and response to comments pertaining to this issue. While the analysis does not explicitly identify noise impacts from the proposed Southern California Edison (SCE) Substation Yard, medium voltage distribution system, and generator yard, noise impacts of these improvements are considered to be negligible. According to the National Electrical Manufacturers Association (2014) and the Delta Transformers Inc. (2009) new medium voltage substation transformers generate a typical noise level of 45 to 50 dBA at a distance of 50 feet, which is well below the ambient day-night average noise level (L_{dn}) noise levels for the Project site and surrounding vicinity, which range from 60 to 70 dBA. Ambient noise generated by the proposed electrical yard would be largely imperceptible to surrounding residences due to the distance of the yard to nearby receptors and existing ambient noise environment.

For other issues associated with the proposed SCE Substation, refer to Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard.

Oral Comment GG-4

The comment states that the greenspace on Diamond Street has been an issue of contention and claims that EIR dismisses impacts to biological resources as result of the proposed Project. However, contrary to the commenter's assertion, the EIR does not disregard the greenspace. Rather, the issue of vegetation removal is discussed at length in Section 3.3, *Biological Resources* under Impact BIO-1. This analysis was supported by the preparation of a Tree Inventory Report prepared by Carlberg Associates. The discussion acknowledges the removal of approximately 20 landscaped trees along Flagler Lane (north of Towers Street). However, these trees would be

replaced within new vegetation that meets the landscaping regulations provided in Redondo Beach Municipal Code (RBMC) Section 10-2.1900. Additionally, the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane (refer to Section 3.3.2, *Regulatory Setting*). As shown in Figure 2-7, the electrical yard would be screened with flowering ornamental trees and shade trees. Therefore, the EIR finds that long-term impacts would be less than significant. The comment does not challenge the thresholds or methodology used to reach these conclusions in the EIR.

Sheila Lamb*Oral Comment SL-1*

The comment claims that the discussion of the existing land use designation misleads the public because it omits the Redondo Beach Municipal Code (RBMC) zoning definition of P-CF (Community Facilities) and its permitted uses. As described in the response to Comment SL4-6 as well as Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, areas zoned as P-CF (Community Facilities) provide lands for park, recreation and open space areas, schools, civic center uses, cultural facilities, public safety facilities, and other public uses which are beneficial to the community (RBMC Section 10-2.1110). Under RBMC Section 10-2.1110, residential care facilities are clearly allowed in areas zoned as P-CF with a conditional use permit (CUP). As described in RBMC Section 10-2.1116 the FAR, building height, number of stories, and setbacks are subject to Planning Commission Design Review.

Oral Comment SL-2

The comment claims that the project objectives mislead the public by mischaracterizing the scope and reach of the Beach Cities Health District (BCHD) programs and services. As described in the response to Comment SL2-1, this comment does not address the adequacy of the Environmental Impact Report (EIR) with regard to the environmental impact analysis, mitigation measures, and alternatives. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to the underlying purpose for the proposed Project.

Oral Comment SL-3

The comment claims, without substantial evidence, that the proposed Project is too tall for the adjacent neighborhoods. The comment goes on to claim that the proposed Project would block views of the Palos Verdes ridgeline, block blue sky views for neighbors, and cast shadows. Each

of these issues are discussed at length in Section 3.1, *Aesthetics and Visual Resources*. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic views and vistas. The comment does not challenge any specific aspect of the methodologies, thresholds, or findings of the impact analysis. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character as well as shade and shadows.

Oral Comment SL-4

The comment claims that the proposed Project is a commercial enterprise and that BCHD is chartered and funded to serve residents of the Beach Cities. However, as described in Master Response 7 – Project Compatibility with P-CF Zoning Land-Use Designation, BCHD has utilized public/private partnerships for decades to provide a variety of free and low-cost programs and services to its service population within the Beach Cities as well as other South Bay communities. The proposed Project would continue this model to reinvest revenue into community services such as senior care and health programs. Similar to the existing BCHD campus, the proposed Project would continue to provide services and programs that benefit the overall health and wellbeing of the community.

Sabrina Kerch

Oral Comment SK-1

The comment identifies the photosimulation at Representative View 6 and notes that nobody lives at that location. Instead, the commenter requests a photosimulation from their street, Tomlee Avenue. First it should be noted that the California Environmental Quality Act (CEQA) requires an analysis of public views, including public roads, sidewalks, and other public viewing locations. In 2018, Appendix G of the CEQA Guidelines was updated to clarify that impacts to public (not private) views may be significant under CEQA. As such, effects on private views are not considered under CEQA (Public Resources Code Section 21082.2).

The comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2. The impact to scenic views would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane.

MM VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. This analysis is supported by Representative Views 1 through 5, which surround the Project site (refer to Figure 3.1-1). It should be noted that Representative View 1 is taken from Tomlee Avenue, as requested by the comment.

Oral Comment SK-2

The comment questions what the level of construction-related traffic will be like during construction activities associated with the proposed Project. Construction-related traffic, including haul truck trips, materials delivery trips, concrete truck trips, and construction worker trips are very clearly described in Section 3.14, *Transportation* under Impact T-1. For example, as described therein, “[c]onstruction activities associated with Phase 1 of the proposed Project would generate up to approximately 1,825 haul truck trips for export of demolished asphalt and excavated soil, and 2,000 haul truck trips for export of demolition debris. Additionally, construction of the RCFE Building would require approximately 1,237 truck trips for concrete delivery. Backfill of the Beach Cities Health Center basement would require approximately 875 truck trips for import of clean soil (refer to Section 2.5.1.3, *Construction Activities*). Construction activities associated with the Phase 2 development program would require approximately 1,660 trips associated with export of demolition debris and excavated soil and approximately 2,149 trips associated with concrete and steel deliveries (refer to Section 2.5.2.4, *Construction Activities*).”

Oral Comment SK-3

The comment states that the Environmentally Superior Alternative, Alternative 4 – Phase 1 Preliminary Site Development Plan Only, would provide less public serving uses. This issue is identified in the discussion describing the relationship of the alternative to the project objectives (refer to Section 5.5.4, *Alternative 4 – Phase 1 Preliminary Site Development Plan Only*). his comment does not address the adequacy of the EIR or the impact analysis and represents the commenter’s opinion, which will be considered by the BCHD Board of Directors during deliberations on the proposed Healthy Living Campus Master Plan.

Frank von Coelln

Oral Comment FVC-1

The comment asks logistical questions about the format and content of the presentation of the next public meeting on the Draft Environmental Impact Report (EIR). These are not comments on the

adequacy or technical sufficiency of the environmental impact analysis, mitigation measures, and/or alternatives presented in the EIR.

Oral Comment FVC-2

The comment expresses general opposition to the proposed Project and concerns about shade and shadows on neighboring residents. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to the shade and shadow analysis. Refer also to Master Response 1 – General Opposition to the Project. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

Michael

Oral Comment M-1

The comment requests that the comments on the Draft Environmental Impact Report (EIR) be released to the public. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration

Oral Comment M-2

The comment asserts that the No Project Alternative should have analyzed a scenario in which the Beach Cities Health District does nothing with the existing BCHD campus. For context, pursuant to California Quality Act (CEQA) Guidelines Section 15126.6(e)(1), “[t]he purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Pursuant to CEQA Guidelines Section 15126.6(e)(2), “[t]he ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The EIR correctly describes that under the No Project Alternative, the proposed Healthy Living Campus Master Plan would not be implemented and the existing BCHD campus would not be redeveloped. In addition, BCHD would continue to lease the vacant Flagler Lot as a construction

staging area and a source of operational revenue. BCHD would continue to provide building maintenance as required. However, as described in Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program offerings. For example, the existing Center for Health and Fitness (CHF) would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities and the surrounding South Bay communities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities. This description of what is “*reasonably expected to occur in the foreseeable future*” clearly meets the requirements of CEQA Guidelines Section 15126.6(e).

It should also be noted the demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District and substantially reducing public health service available to Beach Cities residents and even those of the South Bay. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the

BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing BCHD campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant Flagler Lot for redevelopment that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion of the Project site. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission.

Ann Wolfson

Oral Comment AW1-1

The comment expresses the commenter’s opinion that the Draft Environmental Impact Report (EIR) presentation was cursory and that the answers should be provided to questions during the meeting. This comment does not address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration.

8.3.7.3 Saturday, April 17, 2021

Susan Yano

Oral Comment SY2-1

This comment asserts that the Beach Cities Health District (BCHD) property encroaches onto the City of Torrance property. This distinction regarding the City of Torrance right-of-way does not address the adequacy of the EIR or any physical environmental issues as required by CEQA.

Oral Comment SY2-2

As described in Section 5.0, *Alternatives*, the demolition activities described under the No Project Alternative may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017. Therefore, Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus has also been analyzed. Under this alternative, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing BCHD campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant

Flagler Lot for redevelopment that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion of the Project site. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide at least some level of community health and wellness programs and services in accordance with its mission. BCHD has the authority to acquire and transfer assets at fair market value pursuant to Health and Safety Code Division 23 Hospital Districts §§32000–32492 of the California Healthcare Code. For example, Health and Safety Code §32121 states, “[e]xcept as provided in this section, by resolution, the board of directors of a local hospital district may authorize the disposition of any surplus property of the district at fair market value by any method determined appropriate by the board.”

Oral Comment SY2-3

The comment asks what are the financial uncertainties associated with Phase 2 and further requests a discussion of the full scop of financing for both Phase 1 and Phase 2. The comment also asks what would happen in the event of a budget overrun during construction. Refer to Master Response 6 – Financial Feasibility/Assurances as well as Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to these issues.

Oral Comment SY2-4

The comment states, without substantial evidence or expert opinion, that the noise mitigation measures are not sufficient. The comment does not provide any additional suggested mitigation measures or otherwise describe how the mitigation measures are not sufficient. Refer to Master Response 12 – Noise Analysis for a detailed discussion and response to comments pertaining to the noise analysis and associated mitigation measures.

Oral Comment SY2-5

The comment questions the definition of feasibility for the measures identified in Mitigation Measure (MM) NOI-1. As described in the response to Oral Comment F-3, Impact NOI-1 clearly identifies discusses issues related to the feasibility. As described therein:

“[t]he feasibility of noise barrier construction is limited based on engineering variables (e.g., wind load, etc.) and property ownership...For Phase 1 and Phase 2 construction, the necessary noise barrier heights (i.e., up to 105 feet) at the edge of the BCHD development footprint are too great to allow only one- to three-sided barriers and the total building footprint is too large to construct a fully enclosed four-sided noise barrier. Further, the

construction of the foundation and framing structure required to support a fully enclosed four-sided noise barrier would result in significant and unavoidable noise impacts to adjacent residential areas in Redondo Beach and West Torrance.

A shorter noise barrier could be constructed at the edge of the sensitive receptors in West Torrance (and similarly in Redondo Beach). However, any such off-site construction of a noise barrier would require approval from the City of Torrance and/or the City of Redondo Beach, which cannot be assured. Additionally, while the construction of a 30-foot-tall noise barrier may be feasible along Flagler Lane and Flagler Alley, a 30-foot noise barrier along Beryl Street and North Prospect Avenue fronting residences may not be feasible.”

Oral Comment SY2-6

The comment identifies language within MM NOI-1 that states trucks should attempt to operate in the inner lane on designated haul routes. First, it should be noted that temporary construction-related trips would increase daytime noise by less than 1 dBA on the majority of the streets analyzed (refer to Table 3.11-21). Noise contributions from these haul truck trips would be imperceptible (i.e., less than 3 dBA). As required by MM NOI-1 trucks should attempt to operate in the inner lane to further reduce roadway noise; however, this cannot be reasonably required depending on traffic conditions during hauling activities.

Oral Comment SY2-7

The comment states the notification requirements provided in MM NOI-1 are not meaningful and requests details regarding the telephone number for complaints. While noticing efforts would not reduce noise, they are routinely issued by local municipalities and other developers to increase awareness of construction activities. The notices will also be important for distributing the non-automated telephone number available for residents and employees to call to submit complaints associated with construction noise. Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15097 a Mitigation, Monitoring, and Reporting Program (MMRP) has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* to further define implementation responsibilities, monitoring, and reporting actions.

Ann Wolfson

Oral Comment AW2-1

The comment suggests that the illustrative designs do not accurately represent the Phase 2 development plan. As described in Section 3.2, *Aesthetics and Visual Resources* under Impact

VIS-1, the final design and construction of Phase 2 would not begin until 2029, approximately 5 years after the completion of Phase 1. As such, unlike the Phase 1 preliminary site development plan, the Phase 2 development program is less defined and the ultimate design would be dependent upon the community health and wellness needs and financing considerations at the time. Nevertheless, the analysis provides descriptions for three representative example site plan scenarios, which were used to illustrate potential impacts to visual character. These descriptions are accompanied by visual renderings provided by Paul Murdoch Architects. The impact analysis describes an envelope of development with conclusions conservatively based on maximum disturbance footprints and maximum building heights. Refer to Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis as well as Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to these issues.

Oral Comment AW2-2

The comment states that it is a red flag that the EIR identifies impacts that are less than significant with mitigation. Contrary to the commenters assertion, the identification of impacts that are less than significant is not a red flag. In fact, the California Environmental Quality Act (CEQA) requires public lead agencies to impose feasible mitigation measures as part of the approval of a project in order to substantially lessen or avoid the significant adverse effects of the project on the physical environment.

The comment goes on to identify Impact VIS-1 as an example of an impact that has been reduced to a less than significant level with the implementation of Mitigation Measure (MM) VIS-1. The comment states that this disregards the everyday view of adjacent residences. However, the comment fails to note the clear distinction between the potential impacts to scenic vistas described under Impact VIS-1 and the potential impacts to visual character described under Impact VIS-2. The impact to scenic views, which is the subject of the comment, would result from the height of the proposed Residential Care for the Elderly (RCFE) Building, which would interrupt public views of the ridgeline of the Palos Verdes hills when viewed from the public road at the intersection of 190th Street & Flagler Lane. MM VIS-1 would reduce the height of the proposed RCFE Building below this scenic ridgeline, which would reduce the impacts to scenic views to a less than significant level. Potential impacts to visual character are separately addressed under Impact VIS-2. In short, the EIR provides more than 70 pages of analysis to assess potential aesthetic impacts supported by more than a dozen photographs and detailed computer-generated photosimulations prepared by licensed architects to thoroughly describe potential impacts to scenic

views and vistas. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.

Oral Comment AW2-3

The comment states that missteps during construction could result in unintended impacts and references a nearby ruptured water main that was accidentally hit during drilling activities. However, pursuant to the requirements CEQA, the impact analysis focuses on reasonably foreseeable environmental impacts and does not engage in speculation or conjecture regarding unlikely or unforeseeable accidents.

Mark Nelson

Oral Comment MN2-1

The comment reference a March 2021 Wall Street Journal article involving a civil settlement between Wood Environment & Infrastructure Solutions, Inc. (Wood) and Scottish prosecutors. Refer to Master Response 15 – Purpose of Public Review.

Oral Comment MN2-2

The comment states that all six of the project objectives lack foundational basis. Refer to Master Response 3 – Project Need and Benefit as well as Master Response 4 – Project Objectives for a detailed discussion and response to comments pertaining to these issues. Additionally, responses to Comments TRAO-1 through TRAO-10 also addresses the project objectives.

It should be noted that the Beach Cities Health District (BCHD) has been clear and transparent about the fact that as an outpatient medical campus, BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus at this time. For example, the Alfred E. Alquist Hospital Facilities Seismic Safety Act, which was amended under Senate Bill (SB) 1953 (Chapter 740, Statutes of 1994, Seismic Mandate), does not apply to the buildings on the BCHD campus. However, recognizing that the structures pose a potential future public safety hazard for building tenants in addition to the escalating maintenance costs, which detract from health care services, the BCHD Board of Directors prioritized the consideration and elimination of seismic-related hazards in concert with the proposed redevelopment under the Health Living Campus Master Plan.

Oral Comment MN2-3

The comment asserts that the proposed Project is taller with more square footage than the 2019 Master Plan. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion and response to comments pertaining to this issue. As described therein, in response to the community’s concerns described above, BCHD revised the footprint of the Residential Care for the Elderly (RCFE) Building was further revised to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. The 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

Oral Comment MN2-4

The comment claims, without substantial evidence, that this increase in height would shade public recreation areas as well as surrounding neighborhoods and roadways. Refer to Master Response 9 – Aesthetics and Visual Resources Analysis for a detailed discussion of the shade and shadow analysis, which is supported by modeling of potential changes in shade and shadows performed by licensed architects.

The comment goes on to claim, again without substantial evidence, that the proposed Project would have a significant and unavoidable impact on Towers Elementary School. It is important to note that while the EIR finds significant and unavoidable construction noise impacts to adjacent residences within the City of Torrance residential neighborhood to the east exterior noise levels and vibration levels experienced at Towers Elementary School would not exceed the Federal Transit Administration (FTA) thresholds identified in the EIR (refer to Table 3.11-16 and Table 3.11-17).

Brianna Egan

Oral Comment BE-1

The comment states that the Beach Cities Health District (BCHD) should keep the community in mind as new services or plan are developed, particularly with things like the proposed Aquatic Center. This comment does address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should also be noted that BCHD strives to understand and incorporate community needs as new services are developed. This is accomplished through surveys and reporting efforts such as the Community Health Report (<https://www.bchd.org/healthreport>). With regard to the Aquatics Center, in an effort to further refine community needs, BCHD contracted with Ballard*King & Associates, a recreation consulting firm specializing in recreation and sports feasibility studies. Ballard*King & Associates prepared an Aquatics Report, which includes a robust local survey involving 2,256 responses that focused on the types of aquatic programs respondents were interested.

Oral Comment BE-2

The comment requests that the EIR address the potential impacts of climate change and the environmental cost of demolishing buildings and constructing new buildings. These issues are addressed in detail in Section 3.5, *Energy* as well as Section 3.7, *Greenhouse Gas Emissions and Climate Change*. As described in Section 2.5.1.5, *Sustainability Features*, all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11). As described in the response to Comment TRAO-69, the design of the proposed RCFE Building would optimize passive design strategies, which would use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

- Photovoltaic solar panels occupying approximately 25-50 percent of the roof area;
- Solar hot water system to reduce energy use;
- Energy efficient heating, ventilation, and air conditioning (HVAC) systems;
- Operable windows for natural ventilation;
- High-performance building envelope – including thermal insulation;

- Controlled natural lighting and lighting systems designed with occupancy sensors and dimmers to minimize energy use;
- Water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.); and
- Interior materials with low volatile organic compound (VOC) content;
- Plant palette comprised of species adapted to the climate of Southern California;
- High efficiency irrigation system; and
- Pervious paving to promote on-site stormwater infiltration.

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

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

Oral Comment BE-3

The comment requests consideration of retrofitting existing structures rather than demolishing and reconstructing. As described in the *Beach Cities Health District Seismic Assessment*, the combined cost of seismic retrofit and renovation of the building to attract and accommodate future tenants would render such a dual undertaking economically infeasible. However, under the No Project Alternative, BCHD would attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If the bond measure

were successful, BCHD would implement the seismic retrofit. Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions.

Oral Comment BE-4

The comment suggests that BCHD consider the possibility for community organizations to be able to rent rooms. Further the comment suggest that BCHD should consider native plants, drought-tolerant plants, and even fruit trees. This comment does address the adequacy of the EIR with regard to the environmental impact analysis, mitigation measures, and alternatives. Nevertheless, this comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan. It should be noted that the perimeter of the BCHD campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Additionally, the proposed Project would upgrade the existing Demonstration Garden, which would feature demonstration vegetable garden plots, an orchard with citrus and other fruit trees, and a garden shed (refer to Section 2.5.1.1, *Proposed Uses*).

Brian Wilson

Oral Comment BW-1

These are not public comments on the EIR, but instead a request for clarification regarding the calculation of construction noise (e.g., a description of how to read Table 3.11-16 and Table 3.11-17).

Tim Ozenne

Oral Comment TO-1

The comment voices support to the previous oral comments provided by Ann Wolfson. Refer to the responses to Oral Comment AW-1 through AW-3.

Oral Comment TO-2

The comment states that the Residential Care for the Elderly (RCFE) Building would reach a height of 130 feet over Flagler Lane and requests a photosimulation on the north end of Tomlee Avenue. Refer to the response to Comment TRAO-20 as well as Master Response 9 – Aesthetics

and Visual Resources Analysis for a detailed discussion and response to comments pertaining to building height and visual character.